



PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST



INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐
RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 1030316 **DATE:** 7/19/2007 **ARRIVE:** 1:40PM **DEPART:** 2:35 AM

FACILITY NAME: BRISTOL CLEANERS & LAUNDRY

FACILITY LOCATION: 120 107th Ave
TREASURE ISLAND 33706

RESPONSIBLE OFFICIAL: BASSAM MUSA **PHONE:** (727)360-2194

CONTACT NAME: BASSAM MUSA **PHONE:** (

REMITTANCE YEAR: 2006 **ENTITLEMENT PERIOD:** 11/24/2002 / 11/24/2007
(effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check ☒ only one box)

☐ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE ☒ SIGNIFICANT Non-COMPLIANCE

PART II: FACILITY CLASSIFICATION - Rule 62-213.300 FAC

(check ☒ only one box in A)

A. 1. Existing small area source ☐

dry-to-dry only, $x < 140$ gal/yr
transfer only, $x < 200$ gal/yr
both types, $x < 140$ gal/yr
(constructed before 12/9/91)

2. New small area source ☒

dry-to-dry only, $x < 140$ gal/yr
transfer only, $x < 200$ gal/yr
both types, $x < 140$ gal/yr
(constructed on or after 12/9/91)

3. Existing large area source ☐

dry-to-dry only, $140 \leq x \leq 2,100$ gal/yr
transfer only, $200 \leq x \leq 1,800$ gal/yr
both types, $140 \leq x \leq 1,800$ gal/yr
(constructed before 12/9/91)

4. New large area source ☐

dry-to-dry only, $140 \leq x \leq 2,100$ gal/yr
transfer only, $200 \leq x \leq 1,800$ gal/yr
both types, $140 \leq x \leq 1,800$ gal/yr
(constructed on or after 12/9/91)

5. Ineligible for General Permit ☐

drop store/out of business/petroleum
facility exceeds above limits

B. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was ~65 gallons.

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC(check ☒ only one box
for each question)**Does the responsible official of the dry cleaning facility:**

1. Store perc, and wastes containing perc, in tightly sealed & impervious containers? ☒ Yes ☐ No ☐ N/A
2. Examine the containers for leakage? ----- ☒ Yes ☐ No ☐ N/A
3. Close and secure machine doors except during loading/unloading? ----- ☒ Yes ☐ No
4. Drain cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? ----- ☐ Yes ☐ No ☒ N/A
5. Maintain solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? ----- ☐ Yes ☐ No ☒ N/A

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC(Refer to Part II-A.1.-4. Classification: page 1 of 4, this form)

1. If the facility classification is a **Existing small area source**, no controls are required. **Proceed to Part V.**
2. If the facility classification is a **New small area source**, the machine should be equipped with a refrigerated condenser. **Complete section A. below.**
3. If the facility classification is a **Existing large area source**, the machine should be equipped with either a refrigerated condenser or a carbon adsorber. **Complete both sections A and B below.** *Carbon adsorber must have been installed prior to September 22, 1993*
4. If the facility classification is a **New large area source**, the machine should be equipped with a refrigerated condenser. **Complete both sections A and B below.**

A. Has the responsible official of all existing large area & new sources:(check ☒ only one box for
each question)

1. Equipped all machines with the appropriate vent controls? ----- ☒ Yes ☐ No
2. Equipped dry-to-dry machines with a closed-loop vapor venting system? ----- ☒ Yes ☐ No ☐ N/A
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? ----- ☐ Yes ☐ No ☒ N/A
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? ----- ☐ Yes ☒ No
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F? ----- ☐ Yes ☐ No ☒ N/A
6. Conducted all temperature monitoring after an appropriate cool-down period and after verifying that the coolant had been completely charged? ----- ☐ Yes ☒ No

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)**B. Does the responsible official of an existing large or new large area source also:**(check ☒ only one box for each question)

1. Measure and record the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis? ----- ☐ Yes ☒ No
2. Measure and record the washer exhaust temperature at the condenser inlet and outlet weekly? ----- ☐ Yes ☐ No ☒ N/A
 - a) Is the temperature differential equal to, or greater than 20° F? ----- ☐ Yes ☐ No ☒ N/A
3. Measure and record the perc concentration in the exhaust stream weekly at the end of the final drying cycle while the machine is venting to the adsorber, if machines are equipped exclusively with a carbon adsorber? ----- ☐ Yes ☐ No ☒ N/A
 - a) Is the perc concentration equal to, or less than 100 ppm? ----- ☐ Yes ☐ No ☒ N/A
4. Assure that the sampling port on the carbon adsorber exhaust for measuring perc concentrations is at least 8 duct diameters downstream of any bend, contraction, or expansion; is at least 2 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet? ----- ☐ Yes ☐ No ☒ N/A
5. Equip transfer machines (dryers, reclaimers, and washers) with individual condenser coils? ----- ☐ Yes ☐ No ☒ N/A
6. Route airflow to the carbon adsorber (if used) at all times? ----- ☐ Yes ☐ No ☒ N/A

PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC**Does the responsible official:**(check ☒ only one box for each question)

1. Maintain receipts for perc purchased? ----- ☒ Yes ☐ No
2. Maintain rolling monthly total of yearly perc consumption? ----- ☐ Yes ☒ No
3. Maintain leak detection inspection and repair reports for the following:
 - a) documentation of leaks repaired w/in 24 hrs? or; ----- ☐ Yes ☐ No ☒ N/A
 - b) documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? ----- ☐ Yes ☐ No ☒ N/A
4. Maintain calibration data? (*for applicable direct reading instruments*) ----- ☐ Yes ☐ No ☒ N/A
5. Maintain exhaust duct monitoring data on perc concentrations? ----- ☐ Yes ☐ No ☒ N/A
6. Maintain a startup/shutdown/malfunction plan? ----- ☒ Yes ☐ No
7. Maintain deviation reports? ----- ☐ Yes ☐ No ☒ N/A
 - a) Problem corrected? ----- ☐ Yes ☐ No ☒ N/A
8. Maintain a compliance plan, if applicable? ----- ☐ Yes ☐ No ☒ N/A

PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC(check ☒ only one box for each question)

1. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak

detection and repair inspection? -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. Does the facility maintain a leak log? -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. Does the responsible official check the following areas for leaks?	
a) Hose connections, fittings, couplings, and valves -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
b) Door gaskets and seating -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
c) Filter gaskets and seating -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
d) Pumps -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
e) Solvent tanks and containers--	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
f) Water separators -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
g) Muck cookers -----	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
h) Stills -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
i) Exhaust dampers -----	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
j) Diverter valves -----	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
k) Cartridge filter housings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
4. Which method(s) of detection (is/are) used by the responsible official?	
a) Visual examination (condensed solvent on exterior surfaces) -----	a) <input type="checkbox"/>
b) Physical detection (airflow felt through gaskets) -----	b) <input type="checkbox"/>
c) Odor (noticeable perc odor) -----	c) <input type="checkbox"/>
d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) -----	d) <input type="checkbox"/> **(see below)
e) Halogen leak detector -----	e) <input type="checkbox"/>
**If using direct-reading instrumentation, is the equipment: ----- ** <input checked="" type="checkbox"/> N/A	
1) Capable of detecting perc vapor concentrations in a range of 0-500 ppm? -----	1) <input type="checkbox"/> Yes <input type="checkbox"/> No
2) Calibrated against a standard gas prior to and after each use (PID/FID only)? -----	2) <input type="checkbox"/> Yes <input type="checkbox"/> No
3) Inspected for leaks and obvious signs of wear on a weekly basis? -----	3) <input type="checkbox"/> Yes <input type="checkbox"/> No
4) Kept in a clean and secure area when not in use? -----	4) <input type="checkbox"/> Yes <input type="checkbox"/> No
5) Verified for accuracy by use of duplicate samples (calorimetric only)? -----	5) <input type="checkbox"/> Yes <input type="checkbox"/> No

Shea L. Jackson

7/19/2007

Inspector's Name (Please Print)	Date of Inspection
	~ 8/2007
Inspector's Signature	Approximate Date of Next Inspection

COMMENTS:

- During the inspection of the facility I met with Mr. Musa the facility contact and responsible official. I asked to observe his records. He stated he did not have them up to date. I gave him the P2 - pamphlet and the Dry Cleaning information brochure, the water separator memo. I also gave him the copy of the rule requirement for the Halogen Detector, and informed him he had to purchase one and use prior to the July 27, 2008 date. I informed him that he could check his cleaners supply booklet for a selection of detectors.
- I observed the dry cleaning equipment. The dry to dry was not in operation at this time. Mr. Musa stated he typically cleans 75lbs a day. I did not detect any perchloroethylene odors in the dry to dry area. I asked about the cartridge filters changes he stated he had not changed for a couple of years, since the machine was new. I observed the separator water window and noted the liquid had materials floating in the Perc. I informed him this could be a sign that the filters need to be changed more often. He stated it was a new machine.
- The Hazardous waste containers were in secondary containment by the machine and outside in containment in storage shed. The waste water separator evaporator filtration system was also in the shed. I observed the top appeared to have a check valve unlike that of the typical mister for the waste water separator evaporation systems. Mr. Musa stated he had changed the carbon filters for the waste water separator system about 7 – 9 month ago.
- The dry to dry equipment was not in operation at this time. I asked to see his record calendars. Mr. Musa showed me the 2007 calendar. There were no record entries for the leak and temperature checks. There were no maintenance notes. There were no monthly Perc usage totals entries. (See photos)
- I asked to see the 2006 calendar. He stated he did not have a 2006 calendar. Mr. Musa stated we did not send him a calendar. I told him our department is not the one that sends the calendar. I advised him that he could have looked at the calendar for 2005 and contacted FDEP or us to get the 2006 calendar. I told him he had his previous year's calendars, and he knew he should be performing the weekly leak and temperature checks. He stated it was a new machine. He appeared to think he did not need to check the new machine. I told him that did not matter, he was required to perform the checks, and keep the perc usage totals. I told him that he could have used any calendar or made up the record him self for checking the machine and recording the temperatures.

I asked him what the temperature for the cool down cycle had been. Mr. Musa did not reply to my question as to what the temperatures for the dry to dry had been.

- He stated he did not purchase Perc that much and had only had 3 Perc purchases and 3 Haz waste disposals. I observed the invoices dated as follows. For the Perc purchases. There was 6/ 21/ 2005 was when the machine was installed and filled with 105 gallons + the 20 from the record for a total of 125 gallons, the next invoice was 6/27/2006 – one 15 gallon, the next purchase was 12/26/2006 – one 15 gallon, and most recent purchase was 4/11/2007 – one 15 gallon purchase.

- The Hazwaste manifest copies were for 8/16/2006 - 300lbs – 2 /15 gal containers and 2/14/2007 – 300lbs - 2/15 gal containers.

- When I asked him how he knew the machine was working properly if he was not performing the routine checks and maintenance. He stated he had the maintenance man checking weekly. I asked who that was, he stated “Timothy”. I asked whether or not was Timothy was checking the machine temperature during operation. He stated he was. I asked him why he did not at least observe the machine with the maintenance man and perform the leak and temperature checks and record what was observed. He did not answer. I asked him what the name of the maintenance service company was, he did not answer. I asked him if he had invoices to show the maintenance service. He did not have any. I told him that he had no evidence to demonstrate he was doing the maintenance or temperature checks on the machine. Mr. Musa stated it was a new machine. I asked him if he had a new car would he take it out and drive it and not perform maintenance and oil and filter changes on it. I told him a new machine would still require maintenance and checks to keep it in good working order. It appears that Mr. Musa can not substantiate his claim about periodic maintenance for the dry to dry equipment.

- Mr. Musa asked me to work with him. I told him there was nothing I could do since he had not been performing checks and keeping records, he was in violation and would receive a warning letter and penalties. He told me that I could come back next week, and he would have it corrected. I advised him he could not recover the records, since he had not been performing the checks or recording the temperatures since August 26, 2005.

- I gave him the summary report and noted the violations. (See copy attached). I informed him he would have to account for his Perc usage and should go back through his Perc purchase for the usages and update his total starting back to when the machine was 1st filled. I gave him a 2005 calendar, because we did not have a 2006 calendar. I told him he could adjust it to use as his 2006 record for the Perc usage totals.

- I filled out the annual certification with note of non compliance, with a statement for the date of non compliance from August 2006 – July 2007. Mr. Musa when asked to sign hesitated to sign. He stated you are not working with me. I informed him there was no working with him that this was his annual certification, he was out of compliance, and he needed to sign it. He asked me again to come back and he would have the records straighten out. I told him he needed to sign the annul certification as it was. I informed him I would be coming back to check records, as he need to let me know what his perc usage had been, and I would need to observe the dry to dry machine in operation.

- When asked him why he did not maintain his records, he stated he forgot to do, and then he meant to get back to recording and never did.