

PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

<u>INSPECTION</u> <u>TYPE</u> : ANNUAL ((INS1, INS2) COM	MPLAINT/DISCOV	ERY (CI)		
RE-INSPEC	CTION (FUI) ARM	IS COMPLAINT N	O:		
AIRS ID#: 1030316 DATE: <u>8/7/200</u>	7 ARRI	VE: <u>9:20AM</u>	DEPART: <u>10:40AM</u>		
FACILITY NAME: BRISTOL CLEA	FACILITY NAME: BRISTOL CLEANERS & LAUNDRY				
FACILITY LOCATION: 120 1	107th Ave				
TRE	ASURE ISLAND 33706				
RESPONSIBLE OFFICIAL: BASS.	AM MUSA	PHONE: (727)360-2194			
CONTACT NAME: SAME		PHONE: (
REMITTANCE YEAR: 2006	ENTITLEMENT	PERIOD: 11/24/20 (effective d			
				1	
PART I: INSPECTION COMPLIA	NCE STATUS (check ☑ or	nly one box)			
☐ IN COMPLIANCE ☐ N	MINOR Non-COMPLIANCE	SIGNIFICA	NT Non-COMPLIANCE		
PART II: FACILITY CLASSIFICA (check only one box in		AC			
 A. 1. Existing small area source dry-to-dry only, x < 140 gat transfer only, x < 200 gal/y both types, x < 140 gal/yr (constructed before 12/9/9 3. Existing large area source dry-to-dry only, 140 ≤ x ≤ transfer only, 200 ≤ x ≤ 1, both types, 140 ≤ x ≤ 1,80 	al/yr gr tr b 1) (a 2,100 gal/yr 800 gal/yr tr d 4. N d 4. N	few small area sour ry-to-dry only, $x < 1$ ransfer only, $x < 200$ oth types, $x < 140$ ga constructed on or aft few large area sour ry-to-dry only, $140 \le x$ ansfer only, $200 \le x$ oth types, $140 \le x \le x$	$ 40 \text{ gal/yr} $ $ \text{gal/yr} $ $ \text{al/yr} $ $ \text{er } 12/9/91) $ $ \text{ce } \qquad $		
(constructed before 12/9/91) (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 50 gallons.					

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC (check ☑ only one box				
Do	es the responsible official of the dry cleaning facility:	for each question)		
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		
	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		
	RT IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC efer to Part II-A.14. Classification: page 1 of 4, this form)			
	1. If the facility classification is a Existing small area source , no controls are requi	ired. Proceed to Part V.		
	2. If the facility classification is a <u>New small area source</u> , 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 <u>New large area source</u> , the machine should be excondenser. Complete both sections A and B below.	quipped with a refrigerated		
A.	Has the responsible official of all <u>existing large</u> <u>area & new sources</u> :	(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)				
В.	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 $20^{\circ}\ F?$	□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: <u>RECORDKEEPING REQUIREMENTS</u> – Rule 62-213.300(3) FAC (check ✓ only one box for				
Do	es the responsible official:	each question)		
1.	Maintain receipts for perc purchased?	- X 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 No		
6.	Maintain a startup/shutdown/malfunction plan?	Yes No		
7.	Maintain deviation reports?	Yes No No N/A		
	a) Problem corrected?	Yes No No N/A		
8.	Maintain a compliance plan, if applicable?	Yes No N/A		

PART VI: <u>LEAK DETECTION AND REPAIRS</u> – Rule 62-213.300 FAC

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

(check ☑ only one box for each question)

detection and repair inspection?		
2. Does the facility maintain a leak log?		
3. Does the responsible official check the following areas for a) Hose connections, fittings, couplings, and valves	A g) Muck cookers Yes No N/A A h) Stills	
4. Which method(s) of detection (is/are) used by the respons	sible official?	
a) Visual examination (condensed solvent on exterior surfaces)		
Shea L. Jackson	8/7/2007	
Inspector's Name (Please Print)	Date of Inspection	
	9/1/2007	
Inspector's Signature	Approximate Date of Next Inspection	

COMMENTS:

- During this re- inspection of the facility I met with Mr. Musa the facility contact and responsible official.
- The purpose of this visit was to observe the dry cleaning equipment and observe if maintenance and leak checks were being performed and recorded. The dry to dry was not in operation at this time. I had come early to see the equipment in operation. Mr. Musa had some materials he decided he could run a cycle so we could observe the temperature during the cool down cycle.
- During the cool down cycle I asked Mr. Musa where he was observing the temperature. He showed the temperature on the front of the dry to dry machine control panel, which was indicting to be in cool down cycle.
- I observed the condenser thermometer on the rear of the machine to compare with the digital reading he was monitoring on the front. He stated this was the digital readout was the temperature of the solvent (Perc). (See photos)
- It appeared he was not correctly reading the temperature for the equipment. Mr. Musa was watching the temperature from the digital readout on the front control panel of the dry to dry machine. He stated the temperature of 20 degrees on the digital reading was he believed to be Fahrenheit. I checked the thermometer at the condenser in the rear of the dry to dry and at the time it was reading 20° C and $\sim 60F^{\circ}$. It has temperature markings for F° (red) and C° (black). The thermometers temperature needle gauge was resting on the C° black markings at and was matching the 20 degrees on the digital readout on the front control panel. The dry to dry appeared to be only cooling down to 20° C, and should be below 7.5 C° . There was also a red stationary needle which appears to be used to set the dry to dry to stay within a certain temperature range. I informed him that the thermometer for the correct temperature reading during the cool down cycle would typically be at the condenser, because the digital reading may not be calibrated correctly.
- Mr. Musa stated the maintenance man; Timothy had set the red temperature needle at the set point for the operation of the dry to dry. I advised him that the machine during the cool down cycle needed to be below 45 F, or 7.5C. I informed him to me it appeared was not going down to below 7.5°C. He contacted the maintenance man Timothy and requested he come check the machine. I looked thru his O & M and found the machine was to be set at $25 75^{\circ}$, it did not indicate whether was C° or F° . I told him he needed to check with mfg and be sure would not damage his equipment, but the machine to operate with in the rule conditions had to be able to reach the 7.5 C for being in compliance with the rule.

- I indicated on the Summary form that there were compliance discrepancies. I noted that I could not confirm that the temperature sensor was designed to measure 45°F with an accuracy of -+2 F, and the outlet exhaust temperature of the refrigerated condenser exceeds 45°F and was not repaired within 24 hours. I informed him he need to get it checked and repaired and contact me, as I would need to recheck the machine. I informed him this was a violation which could result in additional penalties.
- I did not detect any perchloroethylene odors.
- Mr. Musa had not maintained his equipment records from September of 2005 up to July 2007. I re checked the calendar records, and he had started monitoring and recording for July 2007, on the week of the 19th. His records were up to date at the time of this inspection.
- I checked his calculations for the Perc usage totals and he had begun again to maintain and record Perc usage and leak observations, since my previous inspection. The Perc total usage was 50 gallons.
- I called and spoke to Mr Musa on 8/22/2007 about what the repair person had found after my inspection. Mr. Musa stated the thermometer in the back of machine was the temperature that is the water to cool down, he stated the digital monitor on the front, is showing that is the temperature was 21 degree Fahrenheit and that temperature during the cool down. 33 to 21 F, for the temperature which is below the 45° F.
- Mr. Musa stated the rear temperature gauge is only recording the water temperature as running thru the machine. Mr. Musa stated that the mechanic from the mfg of the dry to dry stated the thermometer in the rear, has nothing to do with the machine. He said if I still had question regarding the multimatic 40, I could contact Ron Villie, 201-788-1341. He is mfg mechanic for the machine. He stated that the O & M on 4.18.02 page, which we had looked at during the inspection was regarding condenser water, states should be 25 -77 F. If the temperature is not cool enough shuts the machine down. Mr. Musa stated he only wanted to get the matter straighten out and have us to be satisfied was operating correctly. I informed him our dept would also want this, but we would have to continue to investigate until we are sure of if temperature during cool down is within the required range.
- I called 204-9941, and spoke to Timothy, in regards to the thermometer at the condenser; he stated that it was not connected to the monitoring system. The guage with the set point was a safety feature which prevents the water in the condenser from over heating. He stated it would shut off if it reaches the setpoint. I asked if the front monitor indicated C or F. He did not know. I informed him that the temperature in the back was at ~ 20 ° C which appeared to be the same as the monitor in front. He stated he would check the machine and call me back. I informed him of the regulation which requires the exhaust temperature of the condenser to not exceed 45F or 7.5 C.
- I called the number for mfg and got no response.