PERCHLOROETHYLENE DRY CLEANERS
COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

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

AIRS ID#: 103 0318	**Date: 2/22/2011**	**Time In:11:20AM**	**Time Out: 12:00PM**
Facility Name:	Fashion Cleaners & Shirt Laundry, Inc.		
Facility Location:	1152 Court Street		
	Clearwater, FL, 33756		
Responsible Official:	Michael Song	**Phone No:**	727-461-1137
Emis. Unit Description:	New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.		
Permit Number:	1030318-003-AG	**Exp. Date:**	1/3/2012
Facility Contact:	Michael Song	**Phone:**	727-461-1137
Compliance Status:	☒ **IN** ☐ **MNC** ☐ **SNC**		

PART I: NOTIFICATION (Check appropriate box)

1. **Existing** facility notified DARM by 9/1/96 ☐
2. **New** facility notified DARM 30 days prior to startup ☒
3. Facility **failed to notify** DARM to use general permit ☐

PART II: CLASSIFICATION

Facility indicated on notification form that it is:
☐ No Notification Form ☐ Drop-Off Store ☐ Out of business ☐ Petroleum Solvent Only

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> x <2,100** gal/yr
Transfer only, 200> x <1,800 gal/yr ☐
Both types, 140> x <1,800 gal/yr
(Constructed **before 12/9/91**)

4. **New large** area source
Dry-to-dry only, **140> x <2,100** gal/yr
Transfer only, 200> x <1,800 gal/yr ☐
Both types, 140> x <1,800 gal/yr
(Constructed on or **after 12/9/91**)

This is a correct facility classification ☒ Y ☐ N ☐ Can not determine

If no, please check the appropriate classification:
☒ Facility qualified for a general permit as number **2** above.
☐ Facility exceeds above limits and is not eligible for a general permit

B. Highest 12-month consecutive total of perchloroethylene purchased in the preceding 12-month period: 33.27 Gallons. Month with highest use was February 2011. Did facility exceed limits? ☒Y ☐N

PART III: GENERAL CONTROL REQUIREMENTS

Is the responsible official of the dry cleaning facility: (Check appropriate boxes)

1. Storing perchloroethylene in tightly sealed and impervious containers?	☒ Y	☐ N	☐ NA
2. Examining the containers for leakage?	☒ Y	☐ N	☐ NA
3. Closing and securing machine doors except during loading/unloading?	☒ Y	☐ N	
4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal?	☒ Y	☐ N	☐ NA
5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications?	☐ Y	☐ N	☒ NA

PART IV: PROCESS VENT CONTROLS

In Part II-A:

If classification **(1)** has been checked, no controls are required. **Proceed to Part V.**

If classification **(2)** has been checked, the machine should be equipped with a refrigerated condenser (complete A below)

If classification **(3)** has been checked, the machine should be equipped with either a refrigerated condenser or a carbon adsorber (complete A and B below). A Carbon adsorber must have been installed prior to September 22, 1993.

If classification **(4)** has been checked, machine should be equipped with a refrigerated condenser (complete A and B below.)

A. Has the responsible official of all new sources and existing large area sources: (check appropriate boxes)

1. Equipped all machines with the appropriate vent controls?	☒ Y	☐ N	☐ NA
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	☒ Y	☐ N	☐ NA
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door?	☒ Y	☐ N	☐ NA
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis?	☒ Y	☐ N	☐ NA
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45^0 F?	☒ Y	☐ N	☐ NA
6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged?	☒ Y	☐ N	☐ NA

B. Has the responsible official of an existing large or new large area source also:

1.	Measured and recorded the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis?	☒Y ☐N	
2.	Measured and recorded the washer exhaust tem[illegible]re at the condenser inlet and outlet weekly?	☐Y ☐N	☐NA
	Is the temperature differential equal to o[illegible]° F?	☐Y ☐N	☐NA
3.	Measured and recorded th[illegible]concentration [illegible]weekly at the end of the final drying cycle while the [illegible]e is venting [illegible]rber, [illegible]machines are equipped with a carbon ad[illegible]or?	☐Y ☐N	☐NA
	Is the pe[illegible]n e[illegible]or less tha[illegible]ppm?	☐Y ☐N	☐NA
4.	Assured that the s[illegible]g po[illegible]on adsorber exhaust for measuring perc. concentrations is at [illegible]duct dia[illegible]ers downstream of any bend, contraction, or expansion; is at least [illegible]diameters upstream from any bend contraction, or expansion; and downstream from r[illegible]er inlet?	☐Y ☐N	☐NA
5.	Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?	☐Y ☐N	☐NA
6.	Routed airflow to the carbon adsorber (if used) at all times?	☐Y ☐N	☐NA

PART V: RECORDKEEPING REQUIREMENTS

Has the responsible official:
(Check appropriate boxes)

1.	Maintained receipts for perc purchased?	☒Y ☐N	
2.	Maintained rolling monthly averages of perc consumption?	☒Y ☐N	
3.	Maintained leak detection inspection and repair reports for the following:		
	a. Documentation of leaks repaired w/in 24 hrs? or;	☐Y ☐N	☒NA
	b. Documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt?	☐Y ☐N	☒NA
4.	Maintained calibration data? *(direct reading instruments only)*	☐Y ☐N	☒NA
5.	Maintained exhaust duct monitoring data on perc concentrations?	☐Y ☐N	☒NA
6.	Maintained startup/shutdown/malfunction plan?	☒Y ☐N	
7.	Maintained deviation reports?	☐Y ☐N	☒NA
	Problem corrected?	☐Y ☐N	☒NA
8.	Maintained compliance plan, if applicable?	☐Y ☐N	☒NA

PART VI: LEAK DETECTION AND REPAIRS

1.	**Does the responsible official conduct weekly leak detection and repair inspection?**	☒Y	☐N
2.	**Which method of detection does the responsible official use?**	☒Y	☐N
	Visual examination (condensed solvent of exterior surfaces)	☒Y	☐N
	Physical detection (airflow felt through gaskets)	☒Y	☐N
	Odor (noticeable perc odor)	☒Y	☐N
	Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	☐Y	☒N
	If using direct-reading instrumentation, is the equipment:	☐Y	☐N
	a. Capable of detecting perc vapor concentrations in a range of 0-500 ppm	☐Y	☐N
	b. Calibrated against a standard gas prior to and after each use (PID/FID only).	☐Y	☐N
	c. Inspected for leaks and obvious signs of wear on a weekly basis?	☐Y	☐N
	d. Kept in a clean and secure area when not in use.	☐Y	☐N
	e. Verified for accuracy by use of duplicate samples (calorimetric only)?	☐Y	☐N
3.	**Has the facility maintained a leak log?**	☒Y	☐N
4.	**The following area should be checked for leaks by the operator:**	☒Y	☐N

Hose connections, fitting couplings, and valves	☒Y	☐N	Muck cookers	☐Y ☒N
Door gaskets and seating	☒Y	☐N	Stills	☒Y ☐N
Filter gaskets and seating	☒Y	☐N	Exhaust dampers	☒Y ☐N
Pumps	☒Y	☐N	Diverter valves	☐Y ☒N
Solvent tanks and containers	☒Y	☐N	Cartridge Filter housing	☐Y ☒N
Water separators	☒Y	☐N		

Shea Jackson	2/22/2011
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector's Signature	Date of Next Inspection

System Inspection and Leak Detection

Are the following dry cleaning system components inspected weekly for perceptible leaks (sight, smell or touch) while the system is in operation (§63.322(k))? (Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspection of perceptible leaks.) ☒Y ☐N ☐NA

Are the following dry cleaning system components inspected monthly for vapor leaks using a halogenated hydrocarbon detector or PCE gas analyzer while the system is in operation? (Any inspection conducted according to this paragraph shall satisfy the requirements to conduct an inspection for perceptible leaks under §63.322(k) or (l). ☒Y ☐N ☐NA

(1) Hose and pipe connections, fittings, couplings, and valves;

(2) Door gaskets and seatings;

(3) Filter gaskets and seatings;

(4) Pumps;

(5) Solvent tanks and containers;

(6) Water separators;

(7) Muck cookers;

(8) Stills;

(9) Exhaust dampers;

(10) Diverter valves; and

(11) All Filter housings

Is the halogenated hydrocarbon detector or PCE gas analyzer operated according to the manufacturer's instructions? ☒Y ☐N ☐NA

Is the vapor leak inspection conducted by placing the probe inlet at the surface of each component interface where leakage could occur and moving it slowly along the interface periphery? ☒Y ☐N ☐NA

Is the PCE gas analyzer a flame ionization detector, photo ionization detector, or infrared analyzer capable of detecting vapor concentrations of PCE of 25 parts per million by volume? ☐Y ☐N ☒NA

Is the halogenated hydrocarbon detector capable of detecting vapor concentrations of PCE of 25 parts per million by volume and indicating a concentration of 25 parts per million by volume or greater by emitting an audible or visual signal that varies as the concentration changes? ☒Y ☐N ☐NA

ADDITIONAL SITE INFORMATION

Facility Name:	Fashion Cleaners & Shirt Laundry, Inc.
ARMS #:	103 0318

Inspection Comments:

- *During this inspection, I met with the facility responsible official, Mr. Song. I observed the Union L8602000 dryer it was not in operation at time of inspection.*
- *The Fluomatic- BT37 is permanently shutdown, does not contain Perc and is not operational. The machine's base reservoir is empty. This older unit had not been used since October 2005 due to condenser leakage. Mr. Song has considered having it removed when economically possible.*
- *I reviewed the 2010 and 2011 calendar records they were up to date to January 8, 2010.*
- *Mr. Song is recording temperatures and leak check observations and the perchloroethylene usage of the Union 2002 dry cleaning machine only.*
- *The record temperature readings for the 2010 and 2011 year. Mr. Song's observations of the cool down cycle the temperatures are ranging from 31°F – 38°F.*
- *The highest Perc monthly total was 33.27 gallons for month of February 2010.*
- *The most recent P.O. purchase was dated 2/21/2011 for 19.30 gallons. (See photos)*
- *The hazardous waste invoice showed the most recent disposal to be on 12/20/2010 for Perc waste. The hazardous waste receptacle was in place on secondary containment cart with a label dated 12/20/2010 also. (See photos)*
- *The additional waste receptacles were observed as in another secondary containment area in the outside boiler room. (See photos)*
- *The boiler. Fulton 30 HP is located in room on the north side of the facility. (See photo)*
- *I used Mr. Songs Tif XL – 1A Halogen detector to check the equipment for leaks. The Detector is SAE 1627 certified for reading perchloroethylene. The detector was located at the rear of the dry to dry machine. (See Photo)*
- *There were no Perc odors or leaks detected during inspection of equipment.*
- *I left Mr. Song copies of the P2 pamphlet, P2R2 brochure. Mr. Song is using the maintenance manufacturer's calendar for recordkeeping for temperature and leak checks (See photo).*
- *This facility is considered to be in compliance at this time.*

ADDITIONAL SITE INFORMATION

Facility Name:	Fashion Cleaners & Shirt Laundry, Inc.
ARMS #:	103 0318

Machine #1:				
Manufacturer	Union 2000	Capacity	lbs	
Model#	L8602000	Serial#	Mfg yr	2002
Machine #2:	Fluomatic			
Manufacturer	BT37	Capacity	lbs	
Model#		Serial#	Mfg yr	1996

Notification (unpermitted sources only):

1. Was the facility assisted in filling out the notification by the inspector?	☐Y	☒N
2. Did the facility insist on filling out its own notification, and will send it to FDEP?	☐Y	☒N

Record keeping :

1. Does facility have statement/specs as to the design accuracy of the temperature sensor? (Temperature of 45^0F w/accuracy +/– 2^0F, or 7.2EC w/accuracy of +/– 1.1^0C)	☒Y	☐N

Hazardous Waste:

1. Is all perc. contaminated wastewater either treated or disposed of properly?	☒Y	☐N
2. If wastewater is evaporated, is it an approved system, and using carbon filtration?	☒Y	☐N
3. Does the facility have secondary containment for the dry-dry machine?	☒Y	☐N
4. Does the facility have secondary containment for any perc. waste containers?	☒Y	☐N

Boiler:

Manufacturer	Fulton			Hp	
Model #	F8-030-A	Serial #	1030668	Mfg yr	2007

Fuel Type: Natural gas? ☒ Propane? ☐ Fuel oil? ☐

Comments: Exempt boiler

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater

Project Id: 75732 **Permit No:** 1030318-003-AG **Arms Number:** 0318

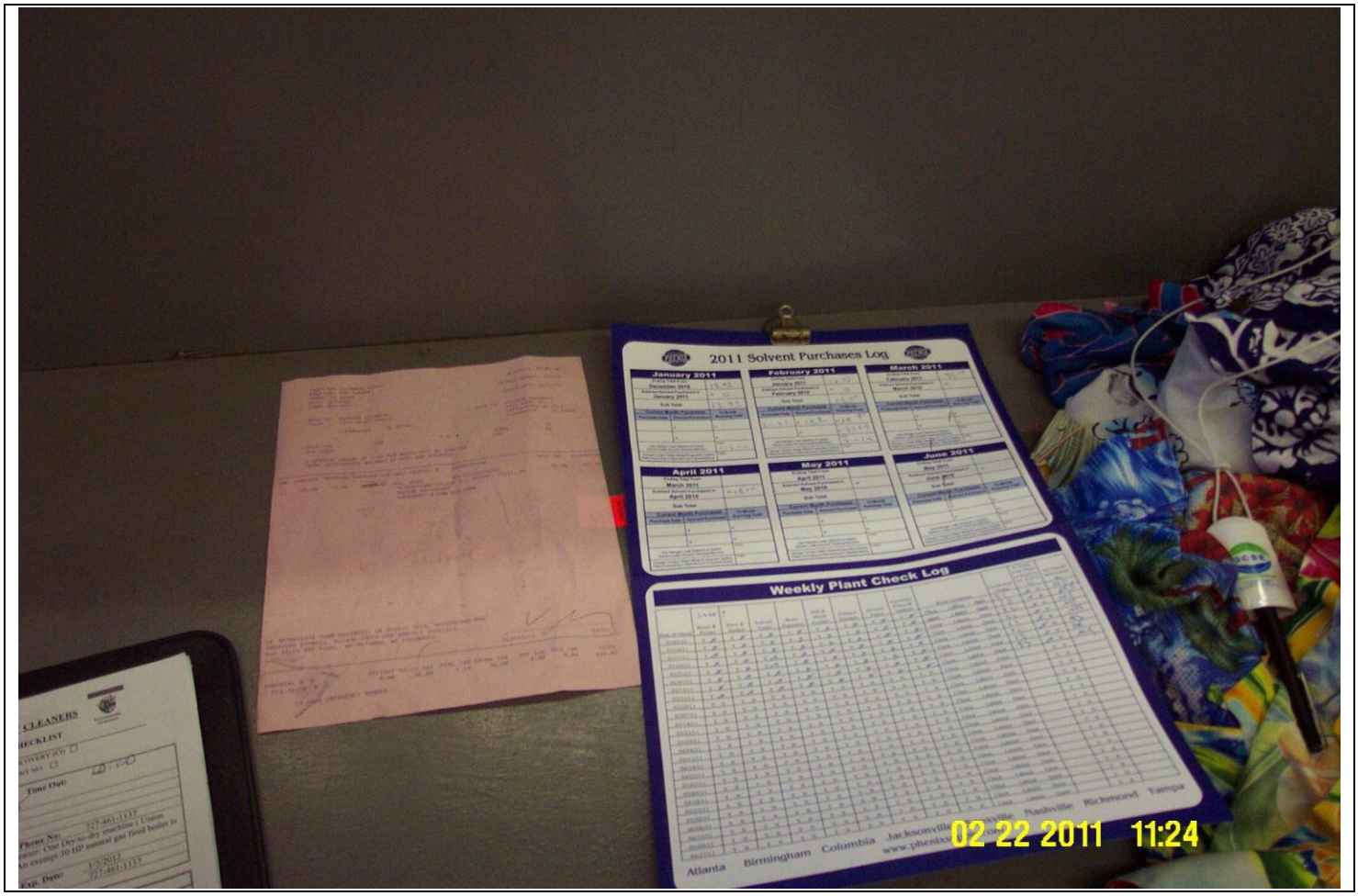
Inspector: Shea Jackson **Inspection Date:** 2/22/2011

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.

Description: [This is the dry to dry in operation during a wash cycle. There were no Perc odors detected during inspection of equipment]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater



Project Id: 75732 **Permit No:** 1030318-003-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date / Time:** 2/22/2011 / _____

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.

Description: [The calendar for records of temperature and leak checks are maintained on the calendar furnished by the Phoenix Perc vendor]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater

Project Id: 75732 **Permit No:** 1030318-003-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date :** 2/22/2011

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.

Description: [There were no Perc odors or leaks detected at the rear of the machine.]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater

Project Id: 75732 **Permit No:** 1030318-003-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date / Time:** 2/22/2011 / _____

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.

Description: [The hazardous waste receptacle was dated 12/20/2011 when the last drums were picked up for disposal]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater

Project Id: 75732 **Permit No:** 1030318-003-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date :** 2/22/2011

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.

Description: [The empty hazardous waste drums are stored here until ready for switch to hook up to dry to dry machine for perc waste disposal]