



PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

| | | | |
|--------------------------------|--|------------------------|-------------------------|
| AIRS ID#: 103 0318 | Date: 1/17/13 | Time In: 1:30PM | Time Out: 2:00PM |
| 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: | 1030318-004-AG | Exp. Date: | 8/21/2016 |
| Facility Contact: | Michael Song | Phone: | 727-461-1137 |
| Compliance Status: | <input checked="" type="checkbox"/> IN <input type="checkbox"/> MNC <input type="checkbox"/> SNC | | |

PART I: NOTIFICATION (Check appropriate box)

- Existing facility notified DARM by 9/1/96
- New facility notified DARM 30 days prior to startup
- 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.**
- | | |
|---|---|
| <u>1. Existing small area source</u> Dry-to-dry only, x <140 gal/yr Transfer only, x <200 gal/yr <input type="checkbox"/> Both types, x <140 gal/yr (Constructed before 12/9/91) | <u>2. New small area source</u> Dry-to-dry only, x <140 gal/yr Transfer only, x <200 gal/yr <input checked="" type="checkbox"/> Both types, x <140 gal/yr (Constructed on or after 12/9/91) |
| <u>3. Existing large area source</u> Dry-to-dry only, 140> x <2,100 gal/yr Transfer only, 200> x <1,800 gal/yr <input type="checkbox"/> Both types, 140> x <1,800 gal/yr (Constructed before 12/9/91) | <u>4. New large area source</u> Dry-to-dry only, 140> x <2,100 gal/yr Transfer only, 200> x <1,800 gal/yr <input type="checkbox"/> 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: 28.9 Gallons. Month with highest use was November 2012. 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? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 2. Examining the containers for leakage? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 3. Closing and securing machine doors except during loading/unloading? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | |
| 4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> 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? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 2. Equipped dry-to-dry machines with a closed-loop vapor venting system? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> 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 temperature at the condenser inlet and outlet weekly?
Is the temperature differential equal to or greater than 10°F? Y N NA
 Y N NA
3. Measured and recorded the perc concentration weekly at the end of the final drying cycle while the machine is venting to the atmosphere. If machines are equipped with a carbon adsorber?
Is the perc concentration equal to or less than 10 ppm? Y N NA
 Y N NA
4. Assured that the sampling position on adsorber exhaust for measuring perc. concentrations is at least 10 duct diameters downstream of any bend, contraction, or expansion; is at least 10 diameters upstream from any bend contraction, or expansion; and downstream from the condenser 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
 Y N
6. Maintained startup/shutdown/malfunction plan? Y N NA
7. Maintained deviation reports?
Problem corrected? Y N NA
 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? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| 2. Which method of detection does the responsible official use? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Visual examination (condensed solvent of exterior surfaces) | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Physical detection (airflow felt through gaskets) | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Odor (noticeable perc odor) | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Use of direct-reading instrumentation (FID/PID/calorimetric tubes) | <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N |
| If using direct-reading instrumentation, is the equipment: | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| a. Capable of detecting perc vapor concentrations in a range of 0-500 ppm | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| b. Calibrated against a standard gas prior to and after each use (PID/FID only). | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| c. Inspected for leaks and obvious signs of wear on a weekly basis? | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| d. Kept in a clean and secure area when not in use. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| e. Verified for accuracy by use of duplicate samples (calorimetric only)? | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 3. Has the facility maintained a leak log? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| 4. The following area should be checked for leaks by the operator: | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Hose connections, fitting couplings, and valves | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Door gaskets and seating | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Filter gaskets and seating | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Pumps | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Solvent tanks and containers | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Water separators | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Muck cookers | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| Stills | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Exhaust dampers | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| Diverter valves | <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N |
| Cartridge Filter housing | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |

| | |
|---------------------------------|------------------------------------|
| Shea Jackson | 1/17/13 |
| Inspector's Name (Please Print) | Date of Inspection |
| Inspector's Signature | Within one year of this inspection |
| | 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:

- *I met with the facility responsible official, Mr. Song, for this inspection.*
- *I observed the Union L8602000 dryer was not in operation at time of inspection.*
- *There were no Perc odors detected during the observations of the machine during operations.*
- *There is a second dry to dry machine, a Fluomatic- BT37. This machine has been permanently shutdown. It does not contain Perc and has not been operational since October 2005 due to the condenser leaks. The machine's perchloroethylene reservoir is empty. Mr. Song stated he will be having it removed when economically possible. Note: this is stated every year.*
- *Mr. Song is using the Phoenix Perchloroethylene vendor's record calendar for keeping the temperature and leak observation checks. I reviewed the 2012 and 2013 calendar records they were up to date. (See Photo)*
- *Mr. Song is recording temperatures and leak check observations and the perchloroethylene usage of the Union 2002 dry cleaning machine only.*
- *Mr. Song's observations of the cool down cycle temperatures readings ranged from 30°F – 34°F for the 2012 and 2013 year.*
- *The highest Perc monthly total was 28.9 gallons for month of November 2012.*
- *The most recent P.O. purchase was dated 9/2012 for 15 gallons.*
- *The hazardous waste invoice showed the most recent disposal to be on 12/11/2012 for 150 lbs of Perc waste. The hazardous waste receptacle was in place on secondary containment receptacle next to the Union dry to dry machine. The additional waste receptacles were observed as in secondary containment in the outside boiler room area. (See photos)*
- *The Fulton 30 HP boiler is located in adjacent room on the north side of the facility. (See photo)*
- *Mr. Songs uses a Tif XL – 1A Halogen detector to check the equipment for leaks. The detector was located at the rear of the dry to dry machine. Mr. Song demonstrated was functional and no Perc leaks detected during inspection of equipment.*
- *I gave Mr. Song the inspection summary. 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 | Capacity | lbs | |
| Model# | Union 2000 | Serial# | Mfg yr 2002 |
| Machine #2: <i>Not Operational</i> | | | |
| Manufacturer | Fluomatic BT37 | Capacity | lbs |
| Model# | | Serial# | Mfg yr 1996 |
| | | L8602000 | |

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? Y N
 (Temperature of 45⁰F w/accuracy +/- 2⁰F, or 7.2EC w/accuracy of +/- 1.1⁰C)

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 | Serial # | 1030668 | Hp 30 |
| Model # | F8-030-A | Serial # | 1030668 | Mfg yr 2007 |

Fuel Type: Natural gas? Propane? Fuel oil?

Comments: Boiler is Exempt

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater



Project Id: 84737 **Permit No:** 1030318-004-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date / Time:** 1/17/2013 / _____

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 union dry to dry machine was not in operation at this time.]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater



Project Id: 84737 **Permit No:** 1030318-004-AG **Arms Number:** 0318
Inspector: Shea Jackson **Inspection Date / Time:** 1/17/2013 / _____
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: [Containers close lids, and use of bag for still to reduce Perc evaporation]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater



Project Id: 84737 **Permit No:** 1030318-004-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date / Time:** 1/17/2013 / _____

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: [Responsible official demonstrating use of Halogen Leak Detector]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater



Project Id: 84737 **Permit No:** 1030318-004-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date / Time:** 1/17/2013 / _____

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: [Temperature and Leak Monthly Records for 2012 and 2013 reviewed]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater



Project Id: 84737 **Permit No:** 1030318-004-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date / Time:** 1/17/2013 / _____

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: [Perc waste goes directly to Hazardous waste container in secondary containment]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: FL000322000007
 2. Page 1 of 1
 3. Emergency Response Phone: 888-646-6824
 4. Manifest Tracking Number: 0108050

5. Generator's Name and Mailing Address:
 FASHION CLEANERS & SHIRT LAUNDRY, INC.
 1152 COURT ST
 CLEARWATER FL 34616
 Generator's Phone: (727) 461-1337
 County: Pinellas
 Tax ID# 93342894
 U.S. EPA ID Number: FL000322000007

6. Transporter 1 Company Name:
 SAFETY-LEASE SYSTEMS, INC.
 U.S. EPA ID Number: TX00000012000

7. Transporter 2 Company Name:
 SAFETY-LEASE SYSTEMS, INC.
 U.S. EPA ID Number: TX00000012000

8. Designated Facility Name and Site Address:
 SAFETY-LEASE SYSTEMS, INC.
 807 MILL STREET CRAWFORD MS 39205
 Facility's Phone: (601) 781-0900

| Re-IM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers No. | Type | 11. Total Quantity | 12. Unit Wt./Vol | 13. Waste Codes | |
|-------|--|--------------------|------|--------------------|------------------|-----------------|------|
| | | | | | | P | D |
| X | 1. UN1987, WASTE TETRACHLOROETHYLENE, 6.1, III (Standard Fillers) | | D | | | P002 | D003 |
| X | 2. UN1987, WASTE TETRACHLOROETHYLENE, 6.1, III (Jumbo) | | D | | | P002 | D003 |
| X | 3. UN1987, WASTE TETRACHLOROETHYLENE, 6.1, III (Liquid) | 1 | D | 150 | | P002 | D003 |
| X | 4. UN1987, WASTE TETRACHLOROETHYLENE, 6.1, III (Solids) | | D | | | P002 | D003 |

14. Special Handling Instructions and Additional Information:
 PERC
 The waste described in this manifest does not meet the definition described in prohibition 40 CFR Part 40.121(b)(2). (Businesses that use perchloroethylene (PCE) for industrial cleaning, maintenance and degreasing should use manifest and 40 CFR Part 40.121(b)(2).) (Businesses that use perchloroethylene (PCE) for industrial cleaning, maintenance and degreasing should use manifest and 40 CFR Part 40.121(b)(2).)

15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
 I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.
 Signature: _____ Date: 1/17/13

16. International Shipments: Import to U.S. Export from U.S.
 Port of entry/exit: _____ Date leaving U.S.: _____

17. Transporter Acknowledgment of Receipt of Materials:
 Transporter 1 Signature: _____ Date: 1/17/13
 Transporter 2 Signature: _____ Date: _____

18. Discrepancy: Quantity Type Residue Partial Rejection Full Rejection
 Manifest Reference Number: _____ U.S. EPA ID Number: _____

18b. Alternate Facility (or Generator):
 Facility's Phone: _____
 Signature of Alternate Facility (or Generator): _____ Date: 1/17/13

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems):
 1. P002
 2. D003
 3. P002
 4. D003

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a.
 Signature: _____ Date: _____

GENERATOR'S INITIAL COPY

Project Id: 84737 **Permit No:** 1030318-004-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date / Time:** 1/17/2013 / _____

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: [Hazardous waste disposal Invoice 150 gallons]

Fashion Cleaners & Shirt Laundry, Inc. Fashion Cleaners

1152 Court Street, Clearwater



Project Id: 84737 **Permit No:** 1030318-004-AG **Arms Number:** 0318

Inspector: Shea Jackson **Inspection Date / Time:** 1/17/2013 / _____

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: [Boiler information]