

PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 103 0324	Date: 10/6/2010	Time In:	11:15 am	Time Out: 11:45 am	
Facility Name:	C&B Dry Cleaning,	Inc.			
Facility Location:	316 East Lake Rd.				
•	Palm Harbor, FL, 34	4685			
Responsible Official:	John Cobos		Phone No	727-789-3518	
The second s	New. Small Perchlor	roethvlene D		e Dry-to-dry machine (20)01)
Emis. Unit Description:		•	•	with a refrigerated conde	
•	1 exempt 25 hp Tho			0	
Permit Number:	1030324-004-AG		Exp. Dat		
Facility Contact:	John Cobos		Phone:	727-789-3518	
Compliance Status:		ÍNC	SNC		
PART I: NOTIFICATIO	N (Check appropriate boy	x)			
		-/			
1. Existing facility notifie	d DARM by 9/1/96				
2. New facility notified DA	ARM 30 days prior to	startup			\boxtimes
3. Facility failed to notify	DARM to use genera	l permit			
PART II: CLASSIFICAT	ΓΙΟΝ				
Facility indicated on noti	fication form that it i	is:			
No Notification Form			out of business	Petroleum Solver	nt Only
A.					5
1. Existing small area	source		2. New small a	rea source	
Dry-to-dry only, $x < 140$	0 gal/yr		Dry-to-dry only	y, x <140 gal∕yr	
Transfer only, x <200 g	gal/yr		Transfer only, x	x <200 gal/yr	\boxtimes
Both types, x <140 gal/	/yr		Both types, x <	140 gal/yr	
(Constructed before 12	2/9/91)		(Constructed or	n or after 12/9/91)	
3. Existing large area s	source		4. New large a	rea source	
Dry-to-dry only, 140 > :	x <2,100 gal/yr		Dry-to-dry only	y, 140> x <2,100 gal/yr	
Transfer only, 200> x <	<1,800 gal/yr		Transfer only, 2	200> x <1,800 gal/yr	
Both types, $140 > x < 1$,	800 gal/yr		Both types, 140	> x <1,800 gal/yr	
(Constructed before 12	2/9/91)		(Constructed or	n 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: 50 Gallons. Month with highest use was 1/2010 . 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	\Box N	□ NA				
2. Examining the containers for leakage?	$\boxtimes Y$	\Box N	□ NA				
3. Closing and securing machine doors except during loading/unloading?4. Draining cartridge filters in their housing or in sealed containers for at	$\boxtimes Y$	\Box N					
least 24 hours prior to disposal?	$\boxtimes \mathbf{Y}$	\square N	\Box NA				
5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications?	ΩY	□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?	$\boxtimes \mathbf{Y}$	\Box N	\Box NA
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	$\boxtimes \mathbf{Y}$	\Box 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° 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 condense on dry-to-dry, reclaimer, and dryer machines on a weekly basis?	r located ⊠Y	□N
2.		outlet $\Box Y$	DN DNA
	weekly? Is the temperature differential equal to on F?	ΠY	□N □NA
3.	Measured and recorded the concentration veekly at the	end of the	
	final drying cycle while the ve is venting other, machines are equi	uipped	
	with a carbon addition?	ΠY	□N □NA
	Is the period is a conclusion or less the ppm?	ΠY	□N □NA
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4.	Assured 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 dust diameters upstream from any bend contraction, or expansion; and downstream from no other inlet?	□Y	□N	□NA
5.	Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?	ΠY	□N	□NA
6.	Routed airflow to the carbon adsorber (if used) at all times?	ΠY	□N	□NA
PA	ART V: RECORDKEEPING REQUIREMENTS			
	as the responsible official: heck 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;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 □Y	□N □N	⊠NA ⊠NA
4.	Maintained calibration data? (direct reading instruments only)	ΠY	□N	⊠NA
5.	Maintained exhaust duct monitoring data on perc concentrations?	ΠY	□N	⊠NA
6.	Maintained startup/shutdown/malfunction plan?	⊠Y	□N	
7.	Maintained deviation reports? Problem corrected?	$\Box Y$ $\Box Y$	□N □N	⊠NA ⊠NA

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 $\Box Y \Box N \boxtimes NA$

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Maintained compliance plan, if applicable?

8.

PART VI: LEAK DETECTION AND REPAIRS

1.	Does the responsible official conduct weekly le	ak det	tection	and repair inspection?	$\boxtimes \mathbf{Y}$	□N
2.	Which method of detection does the responsible	le offic	cial use	?	$\boxtimes \mathbf{Y}$	□N
	Visual examination (condensed solvent of	exteri	ior surfa	aces)	$\boxtimes \mathbf{Y}$	□N
	Physical detection (airflow felt through ga	skets)			$\boxtimes \mathbf{Y}$	□N
	Odor (noticeable perc odor)				$\boxtimes \mathbf{Y}$	□N
	Use of direct-reading instrumentation (FII	D/PID/	calorim	etric tubes)	$\Box Y$	$\boxtimes N$
	If using direct-reading instrumentation, is the	equip	ment:		ΠY	ΠN
	a. Capable of detecting perc vapor concen	tration	is in a ra	ange of 0-500 ppm	ΠY	$\Box N$
	b. Calibrated against a standard gas prior t	to and	after ea	ch use (PID/FID only).	ΠY	ΠN
	c. Inspected for leaks and obvious signs of	f wear	on a we	eekly basis?	ΠY	ΠN
	d. Kept in a clean and secure area when no	ot in us	se.		ΠY	ΠN
	e. Verified for accuracy by use of duplicat	e samp	ples (cal	lorimetric only)?	ΠY	ΠN
3.	Has the facility maintained a leak log?				$\boxtimes \mathbf{Y}$	□N
4.	The following area should be checked for leaks	s by th	ne opera	ator:	$\boxtimes \mathbf{Y}$	□N
	Hose connections, fitting couplings, and valves	$\boxtimes \mathbf{Y}$	$\Box N$	Muck cookers	$\Box Y$	$\boxtimes N$
	Door gaskets and seating	$\boxtimes \mathbf{Y}$	$\Box N$	Stills	$\boxtimes \mathbf{Y}$	□N
	Filter gaskets and seating	$\boxtimes \mathbf{Y}$	$\Box N$	Exhaust dampers	$\boxtimes \mathbf{Y}$	□N
	Pumps	$\boxtimes \mathbf{Y}$	$\Box N$	Diverter valves	$\boxtimes \mathbf{Y}$	□N
	Solvent tanks and containers	$\boxtimes \mathbf{Y}$	$\Box N$	Cartridge Filter housing	$\boxtimes \mathbf{Y}$	□N
	Water separators	$\boxtimes \mathbf{Y}$	$\Box N$			

Shea Jackson	October 6, 2010
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.) $\boxtimes Y \quad \Box N \quad \Box NA$

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). \boxtimes Y \square N \square 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 l	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? $\square Y \square N \square NA$

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? $\Box Y \quad \Box N \quad \boxtimes NA$

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? $\boxtimes Y \quad \Box N \quad \Box NA$

ADDITIONAL SITE INFORMATION

Facility Name:	C&B Dry Cleaning, Inc.
ARMS #:	103 0324

Inspection Comments:

- During the inspection of the facility, I met with the responsible official John Cobos.
- I reviewed the records leak and temperature check entries in the 2009 and 2010 calendars. The records were up to date. The Purchase orders and Hazardous waste manifest were in the calendar records. The most recent purchase was 10 gallons on 9/15/2010 and the disposal had not been done for this year. Mr. Cobos stated they operate the still once a month. The last filter change was made 6/20/2010.
- Mr. Cobos stated they only operate 3 days / week, a couple of cycles per day.
- I observed the Perc usage total averages were from 20 to 50 gallons. The highest usage total was 50 gallons in January 2010, and the current total was 20 gallons.
- The recorded temperature ranges observed were in range of 41 43°F. This is below the 45°F limit and acceptable. (See photo of records)
- *Mr. Cobos demonstrated the use of the TAK Mate Inficon halogen detector they use for checking for Perc Leaks. The detector alarm was beeping did not signal any leaks during survey of machine. (See photo)*
- I toured the facility to observe the dry cleaning machine which was in operation in drying at this time.
- I did not detect any Perc odors in equipment areas.
- I observed the secondary containment container in the boiler room. The facility had placed containers of Perc and waste drums on the containment container. (see photo)
- I gave Mr. Cobos, P2 pamphlet and dry cleaner brochure. I informed Mr. Cobos his permit is due to expire and I would send him the link to internet for renewal to his email at <u>cobosjf@msn.com</u>.
- The facility was found to be in compliance at this time.

ADDITIONAL SITE INFORMATION

Facility Name:	C&B Dry Cleaning, Inc.
ARMS #:	103 0324

Machine #1:						
Manufacturer	Super Tec		Capacity	50	lbs	
Model#	Gold 353		Serial#		Mfg yr	2002
Machine #2:						
Manufacturer			Capacity		lbs	
Model#			Serial#		Mfg yr	
Notification (u	inpermitted sour	ces only):				
		ing out the notification			$\Box Y$	$\boxtimes N$
2. Did the facil	ity insist on filling	g out its own notification	on, and will se	end it to FDEP?	$\Box Y$	$\boxtimes N$
Record keepin	lg:					
1. Does facility	have statement/sp	pecs as to the design ac	curacy of the	temperature sensor?	$\boxtimes \mathbf{Y}$	$\Box N$
(Tempe	erature of 45 ⁰ F w/a	accuracy $\pm -2^{0}$ F, or 7.2	2EC w/accura	$cy of + (-1.1^{\circ}C)$		
Hazardous Wa	aste:					
1. Is all perc. co	ontaminated waste	ewater either treated or	disposed of p	roperly?	$\boxtimes \mathbf{Y}$	□N
2. If wastewate	r is evaporated, is	it an approved system,	, and using car	rbon filtration?	$\Box Y$	⊠N
3. Does the fac	ility have seconda	ry containment for the	dry-dry mach	ine?	$\boxtimes \mathbf{Y}$	$\Box N$
4. Does the fac	ility have seconda	ry containment for any	perc. waste c	ontainers?	$\boxtimes \mathbf{Y}$	$\Box N$
Boiler:						
Manufacturer	Thomasville				Нр	25
Model #	VF 10964	Ser	ial # F-1015	3PV	Mfg yr	1987
Fuel Type:	Natural gas?	⊠ Propa	ne? 🗆	Fuel oil? □		
Comments:	The boiler is exer	mpt from permitting				

316 East Lake Rd., Palm Harbor



 Project Id:
 75677
 Permit No: 1030324-004-AG

 Inspector:
 Shea Jackson
 Inspection Date : 10/6/2010

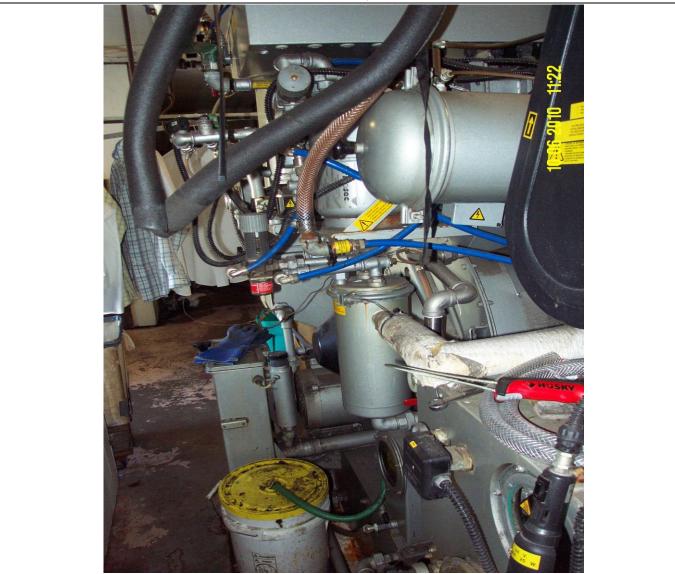
 Source (EU):
 New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (2001),

 Frigo -Sec Model M280-35, serial # 103L9060 with a refrigerated condenser.1

 exempt 25 hp natural gas fired boiler is on-site.

Description: [The dry to dry was in a drying cycle at the time of inspection. There were no odors detected around the machine.]

316 East Lake Rd., Palm Harbor



Project Id:	<u>75677</u>	Permit No: 1030324-004-AG
Inspector:	Shea Jackson	Inspection Date : <u>10/6/2010</u>
Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (2001),		
Frigo -Sec Model M280-35, serial # 103L9060 with a refrigerated condenser.1		
exempt 25 hp natural gas fired boiler is on-site.		

Description: [The rear of the dry to dry was clean and no odors detected in this area.]

316 East Lake Rd., Palm Harbor



Project Id:75677Permit No: 1030324-004-AGInspector:Shea JacksonInspection Date : 10/6/2010Source (EU):New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (2001),
Frigo -Sec Model M280-35, serial # 103L9060 with a refrigerated condenser.1
exempt 25 hp natural gas fired boiler is on-site.

Description: [This is the storage area and where the boiler is located. The containers are stored on the secondary containment area.]

316 East Lake Rd., Palm Harbor



 Project Id:
 <u>75677</u>
 Permit No: 1030324-004-AG

 Inspector:
 <u>Shea Jackson</u>
 Inspection Date : <u>10/6/2010</u>

 Source (EU):
 New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (2001), Frigo -Sec Model M280-35, serial # 103L9060 with a refrigerated condenser.1 exempt 25 hp natural gas fired boiler is on-site.

Description: [The halogen detector was used by the facility contact, Mr. Cobos as he was using around the door seal. There was no alarm in this area.]

316 East Lake Rd., Palm Harbor

PERCI CHEMICAL KITS pent - Calentiti or NoTrouch or Statu Sizing : Beauty Beads or Brite Size Spotter : RK PENS, Pyrmics, Pront cal. TOTAL BALANCE Territical, cal Strip, Zaula, Fault R. 11-2-2 matter, hirosone, Parente 10 06 2010 11:25

 Project Id:
 75677
 Permit No: 1030324-004-AG

Inspector: Shea Jackson **Inspection Date :** <u>10/6/2010</u>

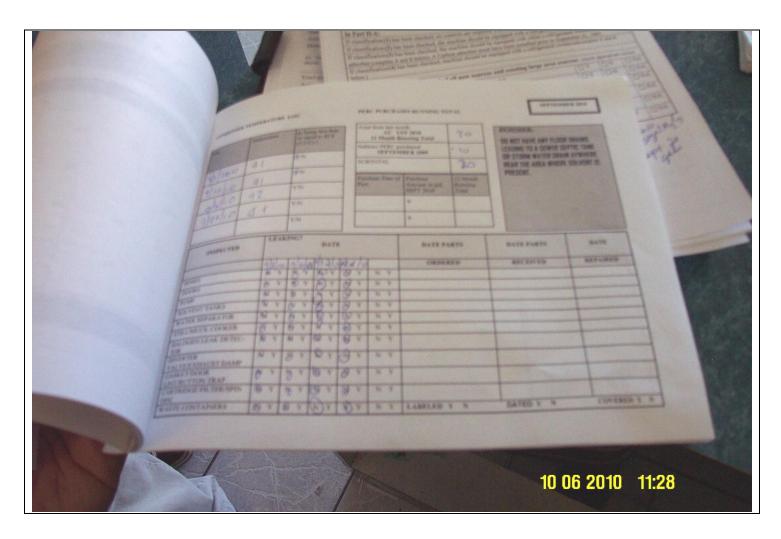
Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (2001),

Frigo -Sec Model M280-35, serial # 103L9060 with a refrigerated condenser.1

exempt 25 hp natural gas fired boiler is on-site.

Description: [The purchase orders for perc are kept in the calendar record with the leak check information and perc totals.]

316 East Lake Rd., Palm Harbor



- **Project Id:** <u>75677</u> **Permit No:** 1030324-004-AG
- **Inspector:** <u>Shea Jackson</u> **Inspection Date :** <u>10/6/2010</u>
- Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (2001),

Frigo -Sec Model M280-35, serial # 103L9060 with a refrigerated condenser.1 exempt 25 hp natural gas fired boiler is on-site.

Description: [The monthly records for the leak and temperature observations were up to date.]