

PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

	PLAINT/DISCOVERY (CI) S COMPLAINT NO:				
AIRS ID#: 0210066 DATE: <u>03/10/2011</u> ARRIV	E: <u>9;00 a.m.</u> DEPART: <u>9:35 a.m.</u>				
FACILITY NAME: Z-CLEANERS					
FACILITY LOCATION: 2638 TAMIAMI TRAIL E					
NAPLES 34112-5707					
OWNER/AUTHORIZED REPRESENTATIVE: PAUL BREEH Email: CONTACT NAME: JENE DALTON Email: ENTITLEMENT PERIOD: 5/10/2007 / 5/10/2012 (effective date) (end date)	NE PHONE: (239)597-1330 Mobile: PHONE: (239)597-1330 Mobile:				
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 F. (check only one box in A)	AC				
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 $12/9/91$) (constructed before $12/9/91$) 3. Existing large area source dry-to-dry only, $140 \le x \le 2,100$ gal/yr transfer only, $200 \le x \le 1,800$ gal/yr both types, $140 \le x \le 1,800$ gal/yr both types, $140 \le x \le 1,800$ gal/yr both	w small area source to-dry only, $x < 140$ gal/yr asfer only, $x < 200$ gal/yr h types, $x < 140$ gal/yr nstructed on or after $12/9/91$) w large area source to-dry only, $140 \le x \le 2,100$ gal/yr asfer only, $200 \le x \le 1,800$ gal/yr h types, $140 \le x \le 1,800$ gal/yr nstructed on or after $12/9/91$)				
B. The sum of the volume of all perchloroethylene (perc) pure cleaning facility was 38.60 gallons.	nases made in each of the previous 12 months by this dry				

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC			check 🗹	only one question)		
1. Is all perc, and wastes containing perc, in tightly sealed & impervious containers?	\boxtimes	Yes	☐ No	N/A		
2. Are all perc. containers leak free?	\boxtimes	Yes	☐ No	□ N/A		
3. Are all machine doors kept closed and secured except during loading/unloading?		Yes	☐ No			
4. Are cartridge filters d rained in their housing or in sealed containers for at least 24 hours prior to disposal?	\boxtimes	Yes	☐ No	□ N/A		
5. Has each dry cleaning system installed after December 21, 2005 at an area source, routed the air-PCE gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser and passed the air-PCE gas-vapor stream from inside the dry cleaning machine drum through a non-vented carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine is opened? The carbon adsorber must be desorbed in accordance with manufacturer's instructions.		Yes	☐ No	⊠ N/A		
6. Is solvent-to-carbon ratios and steam pressure for carbon adsorber beds maintain 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.14. Classification: page 1 of 4, this form) 1. If the f acility classification is an existing small area source, no controls are required. If the facility classification is a new small area source, the machine should be equipped condenser. Complete section A. below.	with	a refrig	gerated			
 If the fa cility classification is an 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 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 <u>existing large area & new sources</u> :			check 🗹			
1. Equipped all machines with the appropriate vent controls?	. 🖂	Yes	☐ No			
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	\boxtimes	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?	\boxtimes	Yes	☐ No	□ N/A		
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis?	\boxtimes	Yes	☐ No	□ N/A		
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			

PA	ART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)							
B. For all existing large or new large area sources:								
	Is the exhaust temperature on the outlet side of the condenser located on dry-to-dry,							
	reclaimer, and dryer machines measured and recorded on a weekly basis?		Yes		No			
2	Is the washer exhaus t temperature at the condenser inlet and outlet measured							
۷.	and recorded weekly?		Yes		No		N/A	
	a) Is the temperature differential equal to, or greater than 20° F?		Yes		No		N/A	
,								
3.	Is the perc concentration in the exhaust stream inlet and outlet measured 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 reservoir concentration could to conlegg than 100 mm?		Vac		Mo		NT/A	
	a) Is the perc concentration equal to, or less than 100 ppm?	Ш	Yes	Ш	No	Ш	N/A	
4.	Is the sampling port on the carbon adsorber exhaust for measuring							
	perc concentrations 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	
	contraction, of expansion, and do mistican from no other meet.		100	ш	110		11/12	
5.	Are transfer machines equipped (dryers, reclaimers, and washers) with individual		• •				37/4	
11	condenser coils?	\sqcup	Yes	\Box	No		N/A	
	condenser cons.							
6.			Yes		No		N/A	
6.	Is airflow routed to the carbon adsorber (if used) at all times?		Yes		No		N/A	
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	Is airflow routed to the carbon adsorber (if used) at all times?		Yes		No		N/A	
			(Ccheck	V	only o	one	
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1. 2. 3.	Is airflow routed to the carbon adsorber (if used) at all times?	\boxtimes	Yes Yes Yes	ox for e	No No No	questic	one on)	
1. 2. 3.	Is airflow routed to the carbon adsorber (if used) at all times?		Yes Yes Yes		No No No No	questic	one on) N/A N/A	
1. 2. 3. 4. 5.	ART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC Are receipts maintained for all perc purchased? ————————————————————————————————————		Yes Yes Yes Yes Yes		No No No No No	questic	one on) N/A N/A N/A	
1. 2. 3. 4. 5. 6.	Is airflow routed to the carbon adsorber (if used) at all times?		Yes Yes Yes Yes Yes		No No No No No No	questic	nne nn) N/A N/A N/A	
1. 2. 3. 4. 5. 6.	ART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC Are receipts maintained for all perc purchased? Are rolling monthly total s of yearly perc consumption maintained? Are leak detection inspection and repair reports maintained for the following: a) Of any leaks repaired w/in 24 hrs? or; b) Of any parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? Is calibration data maintained for applicable direct reading instruments? Is exhaust duct monitoring data on perc concentrations maintained? Is a startup/shutdown/malfunction plan maintained for each machine? Are deviation reports maintained?		Yes Yes Yes Yes Yes Yes Yes Yes		No N	questic	nne nn) N/A N/A N/A N/A	
1. 2. 3. 4. 5. 6. 7.	Is airflow routed to the carbon adsorber (if used) at all times?		Yes Yes Yes Yes Yes Yes		No No No No No No No	questic	nne nn) N/A N/A N/A	

PA	ART VI: <u>LEAK DETECTION AND REPAIRS</u> – Rule 62-213.300 FAC		(check 🗹	only one	
1.	What type of leak detection equipment is used to detect leaks?	bo	ox for each	question)	
	☐ Halogenated hydrocarbon detector ☐ PCE gas analyzer ☐ None used				
2.	Is the halogenated hydrocarbon detector or PCE gas analyzer operated according to				
	the manufacturer's instructions (manual was available and RO could demonstrate				
	procedure) ?	Yes	☐ No		
3.	For major sources is the halogenated hydrocarbon detector or PCE gas analyzer				
	operated according to EPA Method 21 ?	Yes	☐ No	N/A	
4.	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?	Yes	☐ No		
5.	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 (based on documented specifications) ?	Yes	☐ No	N/A	
6.	Is the <u>halogenated hydrocarbon detector</u> capable of detecting vapor concentrations				
	of PCE of 25 parts per million by volume (based on documented specifications) 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? 🖂	Yes	☐ No	N/A	
7.	Are the following dry cleaning system components inspected weekly for perceptible leaks (sight, sm	nell or	touch) while	le the	
	system is in operation (§63.322(k))?				
	(Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for insp	ection	of perceptib	le leaks)	
	b) Door gaskets and seating Yes No N/A h) Stills Y		NoNoNoNoNoNo	N/AN/AN/AN/AN/AN/A	
8.	Are the following dry cleaning system components inspected monthly for vapor leaks using a haloge	enated	hydrocarbo	on detector	
	or PCE gas analyzer while the system is in operation? (Any inspection conducted according to this parag	raph sh	hall satisfy th	ne	
	requirements to conduct an inspection for perceptible leaks under §63.322(k) or (l))				
	b) Door gaskets and seating Yes No N/A N/A N/A Stills Yes Yes No N/A N/A N/A N/A N/A N/A Yes Yes	Yes Yes Yes Yes Yes	□ No□ No□ No□ No□ No	N/AN/AN/AN/AN/AN/A	

PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC (continued)					
9. What evidence suggests that leak checks are performed as required? Leak log documentation RO Assurances On-site observation other Explain other:					
ROBERT J. STEWART	03/10/2011				
Inspector's Name (Please Print)	Date of Inspection				
	03/2012				
Robert J. Stewart					
Inspector's Signature	Approximate Date of Next Inspection				

COMMENTS: Corrected rolling monthly total of yearly PERC consumption to 38.6 gallons beginning March 2011 on the DEP compliance calendar in use at the facility. Facility is in compliance at this time with permit conditions and DEP applicable rules. As a reminder, if the facility is to be closed for any length of time due to non-activity, leak checks on the dry cleaning machine should still be conducted and documented on the compliance calendar at least monthly during the inactive period of time.