



PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 103 0341	Date: 10/27/2011 Time In: 11:45AM Time Out: 12:45PM
Facility Name:	Scott's Custom Cleaners
Facility Location:	755 Indian Rocks Road North Belleair Bluffs, FL, 33770
Responsible Official:	Edward E. Hacker Phone No: 727-584-8382
Emis. Unit Description:	New Large Perchloroethylene Dry Cleaner: One Dry-to-dry machine. Columbia USA- TDMACCI 280MS purchased 2004, controlled by refrigerated condenser. An exempt 50 HP natural gas fired boiler is on-site.
Permit Number:	1030341-004-AG Exp. Date: 11/24/2013
Facility Contact:	Edward E. Hacker Phone: 727-585-4515
Compliance Status:	<input type="checkbox"/> IN <input type="checkbox"/> MNC <input checked="" type="checkbox"/> SNC New owner failed to submit new registration.

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 | <u>2. New small area source</u>
Dry-to-dry only, x <140 gal/yr |
| Transfer only, x <200 gal/yr <input type="checkbox"/> | Transfer only, x <200 gal/yr <input type="checkbox"/> |
| Both types, x <140 gal/yr
(Constructed before 12/9/91) | 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 | <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"/> | Transfer only, 200 > x <1,800 gal/yr <input checked="" type="checkbox"/> |
| Both types, 140 > x <1,800 gal/yr
(Constructed before 12/9/91) | 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 ___ 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: 60 Gallons. Month with highest use was May 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? | <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 ^o 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? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> 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? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> 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 or less than 10 ppm? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> 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 adsorber inlet? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 5. Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 6. Routed airflow to the carbon adsorber (if used) at all times? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |

PART V: RECORDKEEPING REQUIREMENTS

Has the responsible official:

(Check appropriate boxes)

- | | |
|----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| 1. Maintained receipts for perc purchased? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 2. Maintained rolling monthly averages of perc consumption? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 3. Maintained leak detection inspection and repair reports for the following: | |
| a. Documentation of leaks repaired w/in 24 hrs? or; | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 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? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 4. Maintained calibration data? (<i>direct reading instruments only</i>) | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 5. Maintained exhaust duct monitoring data on perc concentrations? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 6. Maintained startup/shutdown/malfunction plan? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 7. Maintained deviation reports? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| Problem corrected? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 8. Maintained compliance plan, if applicable? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 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"/>	<input type="checkbox"/> N			
Hose connections, fitting couplings, and valves	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Muck cookers	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Door gaskets and seating	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Stills	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Filter gaskets and seating	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Exhaust dampers	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Pumps	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Diverter valves	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Solvent tanks and containers	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Cartridge Filter housing	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Water separators	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			

Shea Jackson	October 27, 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: Scott's Custom Cleaners

ARMS #: 103 0341

- Mr. Edward Hacker sent AQ office the 2010 years inspection fee. I contacted Mr. Hacker and inquired as to when he had become the facility owner. He stated on August 1, 2011. I inquired if he had submitted for general permit registration. He stated he had not completed a registration. I informed him according to the rule, he should have submitted 30 days prior to becoming an owner. I sent forms and BMM information in email for him to complete registration on 10/4/2011. I checked GPCI for his submittal on 10/21/2011, and found was not changed from the previous owner. I contacted Mr. Hacker, to see if he had submitted the registration. He sent an email 10/25/2011 stating he had been busy and needed help filling out the form. I determined I would visit on site to help with registration form, and to perform an inspection to determine if the new owner was operating the dry to dry machine according to rule.

Inspection Comments:

- During the inspection of the facility, I met with the Edward Hacker, facility new owner and the, facility contact, dry to dry operator Michael Bassum.
- The previous responsible official; Mr. Hanna Ilia had sold business. Mr. Hacker stated he was new owner and had become partner in ownership with Mr. Michael Bassum as of August 1, 2011. Mr. Hacker had the registration forms, but was unsure about some of the required information regarding Perc usage amounts. We reviewed the form and completed. I informed Mr. Hacker he needed to submit as soon as possible since they were already operating without proper registration. I informed him that they were supposed to register 30 days prior to his new ownership.
- I observed the calendar record logs, for 2010 and 2011. The records were up to date; the current Perc total was 30 gallons. The facility purchased 60 gallons of Perc on 5/11/2011.
- The records are kept on a Phoenix record log sheet furnished by their vendor. Mr. Bassum was keeping records of Perc purchase, hazardous waste invoices, and leak / temperature checks. Mr. Hacker had purchase orders in his office. The Phoenix record sheet showed the ranges of the dry to dry to be maintaining a temperature range of 1 thru 3°C during dryer during the cool downs
- The weekly leak checks had been performed and were up to date 10/24/2011.
- I observed the machine during the operation and noted the temperature gauge was marked for maintaining cool down temperature below 7°C.
- I asked Mr. Bassum to locate and demonstrated using the Haloglen detector. Mr. Bassum used detector for leak check at the rear of machine and around door seal. There were no Perc alarms or odors detected around the machine during the inspection.
- The facility continues to use a water evaporator" Zero Waste HX mister". The equipment has alarm for filter system change and when Perc is detected in water. This is located on the north side of the dry to dry machine.
- I observed the Hazardous waste drums from the dry to dry equipment were sitting in the secondary containment on the west side of machine. There is an additional second containment for lint drums against the east wall.
- I could not have Mr. Hacker sign a copy of the annual certification statement until he is owner. I sent him a copy to signed and fax or mail in, after he has completed the registration as the new owner.
- The facility was not in compliance at this time due to late general permit registration.

ADDITIONAL SITE INFORMATION

Facility Name:	Scott's Custom Cleaners
ARMS #:	103 0341

Machine #1:				
Manufacturer	Columbia USA	Capacity	80	lbs
Model#	TDMACCI 280S	Serial#		Mfg yr 2004
Machine #2:				
Manufacturer		Capacity		lbs
Model#		Serial#		Mfg yr

Notification (unpermitted sources only):

- | | | |
|-------------------------------------------------------------------------------------------|---------------------------------------|---------------------------------------|
| 1. Was the facility assisted in filling out the notification by the inspector? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| 2. Did the facility insist on filling out its own notification, and will send it to FDEP? | <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N |

Record keeping :

- | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|----------------------------|
| 1. Does facility have statement/specs as to the design accuracy of the temperature sensor?
(Temperature of 45 ⁰ F w/accuracy +/- 2 ⁰ F, or 7.2EC w/accuracy of +/- 1.1 ⁰ C) | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|----------------------------|

Hazardous Waste:

- | | | |
|----------------------------------------------------------------------------------------|---------------------------------------|----------------------------|
| 1. Is all perc. Contaminated wastewater either treated or disposed of properly? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| 2. If wastewater is evaporated, is it an approved system, and using carbon filtration? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| 3. Does the facility have secondary containment for the dry-dry machine? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |
| 4. Does the facility have secondary containment for any perc? waste containers? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N |

Boiler:

Manufacturer	Hurst	Hp	50
Model #	Serial # N850720461863	Mfg yr	2005

Fuel Type: Natural gas? Propane? Fuel oil?

Comments: Exempt boiler

ENFORCEMENT SUMMARY

Facility Name:	Scott's Custom Cleaners
ARMS #:	103 0341

Viol#	Violation Description	Frequency	From	To
per00	Failure to notify and obtain a permit		8/1/2011	11/1/2011
per01	No purchase records	Monthly		
per02	No perc. purchase rolling totals	Monthly		
per03	No leak log	<input type="checkbox"/> Weekly <input type="checkbox"/> Bi-weekly		
per04	No temp. log	Weekly		
per05	No SSM plan			
per06	Temp. sensor accuracy verification			
per07	No leak checks	<input type="checkbox"/> Weekly <input type="checkbox"/> Bi-weekly		
per08	No temp. checks	Weekly		
per09	Perceptible leaks			
per10	No carbon absorber			
per11	No carbon absorber test	Weekly		
per12	No leak tight containers			
per13	No separator pre-filter			
per14	Leaks not repaired within 24hrs.			
per15	Repair refrig. cond./carbon abs. within 2 days			

Viol#	Comments
Per00	Failure to submit new registration 30 days prior to new ownership. Facility in violation 3 months.
	<p>Part I. Procedures For Use of General Permit Rule 62-213.300(1)(a),</p> <p>(1) Eligibility Determination.</p> <p>(a) A perchloroethylene dry cleaning facility is eligible to operate under the terms and conditions of the Title V air general permit established at Rule 62-213.300(1)(a), F.A.C., provided the responsible official has submitted a completed Part III of this notification form to the Department at least 30 days prior to beginning operations under the general permit and, throughout the term of the general permit,</p>

Scott's Custom Cleaners
755 Indian Rocks Road North, Belleair Bluffs



Project Id: 80784 **Permit No:** 1030341-004-AG **Arms Number:** 0341

Inspector: Shea Jackson **Inspection Date / Time:** 10/27/2011 / _____

Source (EU): New Large Perchloroethylene Dry Cleaner: One Dry-to-dry machine. Columbia USA- TDMACCI 280MS purchased 2004, controlled by refrigerated condenser. An exempt 50 HP natural gas fired boiler is on-site.

Description: [This is the rear of the dry to dry machine observed during the check for Perc leaks]

Scott's Custom Cleaners

755 Indian Rocks Road North, Belleair Bluffs



Project Id: 80784 **Permit No:** 1030341-004-AG **Arms Number:** 0341

Inspector: Shea Jackson **Inspection Date / Time:** 10/27/2011 / _____

Source (EU): New Large Perchloroethylene Dry Cleaner: One Dry-to-dry machine. Columbia USA- TDMACCI 280MS purchased 2004, controlled by refrigerated condenser. An exempt 50 HP natural gas fired boiler is on-site.

Description: [The hazardous waste drums were closed and in secondary containment vessels.]

Scott's Custom Cleaners
755 Indian Rocks Road North, Belleair Bluffs



Project Id: 80784 **Permit No:** 1030341-004-AG **Arms Number:** 0341

Inspector: Shea Jackson **Inspection Date / Time:** 10/27/2011 / _____

Source (EU): New Large Perchloroethylene Dry Cleaner: One Dry-to-dry machine. Columbia USA- TDMACCI 280MS purchased 2004, controlled by refrigerated condenser. An exempt 50 HP natural gas fired boiler is on-site.

Description: [The is the evaporator for the dry to dry water which checks for Perc **Zero Waste HX mister**]

**DRY CLEANER AIR QUALITY GENERAL PERMIT
ANNUAL COMPLIANCE CERTIFICATION FORM**

FACILITY NAME:	Scott's Custom Cleaners	DATE:	
FACILITY LOCATION:	755 Indian Rocks Road North		
	Belleair Bluffs, FL, 33770		

Annual Reporting Period: May 24 2011 To October 27 2011

Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement.

YES NO

IF NO, complete the following:

#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Failure to register facility dry cleaning operation under new ownership 30 days prior to August 1, 2011

Exact period of non-compliance: **from** _____ **to** _____

Action(s) taken to achieve compliance: _____

Method used to demonstrate compliance: _____

#2. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: **from** _____ **to** _____

Action(s) taken to achieve compliance: _____

Method used to demonstrate compliance: _____

As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, my annual consumption of perchloroethylene solvent, based upon rolling averages of purchase receipts, does not exceed 2,100 gallons per year for dry-to-dry facilities or 1,800 gallons per year for transfer or combination facilities.

RESPONSIBLE OFFICIAL:	<u>Edward E. Hacker</u>		
	(Name, Please Print)	Signature	Date

*This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.