



PERCHLOROETHYLENE DRY CLEANERS



Environmental Compliance

COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1170073 **DATE:** 6/11/08 **ARRIVE:** 10:30 **DEPART:** 11:23
FACILITY NAME: RED BUG DRY CLEANERS
FACILITY LOCATION: 5275 RED BUG LAKE RD #101
 WINTER SPRINGS 32708
OWNER/AUTHORIZED REPRESENTATIVE: SUN KIM **PHONE:** (407)696-4440
CONTACT NAME: **PHONE:**
ENTITLEMENT PERIOD: 8/18/2008 / 8/18/2013
 (effective date) (end date)

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 FAC

(check only one box in A)

- | | |
|---|---|
| <p>A. 1. Existing small area source <input checked="" type="checkbox"/>
 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)</p> | <p>2. New small area source <input type="checkbox"/>
 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)</p> |
| <p>3. Existing large area source <input type="checkbox"/>
 dry-to-dry only, $140 \leq x \leq 2,100$ gal/yr
 transfer only, $200 \leq x \leq 1,800$ gal/yr
 both types, $140 \leq x \leq 1,800$ gal/yr
 (constructed before 12/9/91)</p> | <p>4. New large area source <input type="checkbox"/>
 dry-to-dry only, $140 \leq x \leq 2,100$ gal/yr
 transfer only, $200 \leq x \leq 1,800$ gal/yr
 both types, $140 \leq x \leq 1,800$ gal/yr
 (constructed on or after 12/9/91)</p> |
| <p>5. Ineligible for General Permit <input type="checkbox"/>
 drop store/out of business/petroleum
 facility exceeds above limits</p> | |

B. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 80 gallons.

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC

(check only one box for each question)

Does the responsible official of the dry cleaning facility:

1. Store perc, and wastes containing perc, in tightly sealed & impervious containers? Yes No N/A
2. Examine the containers for leakage? ----- Yes No N/A
3. Close and secure machine doors except during loading/unloading? ----- Yes No
4. Drain cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? ----- Yes No N/A
5. Maintain solvent-to-carbon ratios and steam pressure for carbon adsorber beds 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.1.-4. Classification: page 1 of 4, this form)

1. If the facility classification is a **Existing small area source**, no controls are required. **Proceed to Part V.**
2. If the facility classification is a **New small area source**, the machine should be equipped with a refrigerated condenser. **Complete section A. below.**
3. If the facility classification is a **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*
4. 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 existing large area & new sources:

(check only one box for each question)

1. Equipped all machines with the appropriate vent controls? ----- Yes No
2. Equipped dry-to-dry machines with a closed-loop vapor venting system? ----- 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? ----- Yes No N/A
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? ----- Yes No
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

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)

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

(check only one box for each question)

1. Measure and record the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis? ----- Yes No
2. Measure and record the washer exhaust temperature at the condenser inlet and outlet weekly? ----- Yes No N/A
 - a) Is the temperature differential equal to, or greater than 20° F? ----- Yes No N/A
3. Measure and record the perc concentration in the exhaust stream 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 perc concentration equal to, or less than 100 ppm? ----- Yes No N/A
4. Assure 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 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet? ----- Yes No N/A
5. Equip transfer machines (dryers, reclaimers, and washers) with individual condenser coils? ----- Yes No N/A
6. Route airflow to the carbon adsorber (if used) at all times? ----- Yes No N/A

PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC

Does the responsible official:

(check only one box for each question)

1. Maintain receipts for perc purchased? ----- Yes No
2. Maintain rolling monthly total of yearly perc consumption? ----- Yes No
3. Maintain leak detection inspection and repair reports for the following:
 - a) documentation of leaks repaired w/in 24 hrs? or; ----- Yes No N/A
 - b) documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? ----- Yes No N/A
4. Maintain calibration data? (*for applicable direct reading instruments*) ----- Yes No N/A
5. Maintain exhaust duct monitoring data on perc concentrations? ----- Yes No N/A
6. Maintain a startup/shutdown/malfunction plan? ----- Yes No
7. Maintain deviation reports? ----- Yes No N/A
 - a) Problem corrected? ----- Yes No N/A
8. Maintain a compliance plan, if applicable? ----- Yes No N/A

PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC

(check only one box for each question)

1. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak detection and repair inspection? ----- Yes No

2. Does the facility maintain a leak log? ----- Yes No
3. Does the responsible official check the following areas for leaks?
- | | | | | | | | |
|--|---|-----------------------------|------------------------------|------------------------------|---|-----------------------------|------------------------------|
| a) Hose connections, fittings, couplings, and valves ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | g) Muck cookers ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| b) Door gaskets and seating ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | h) Stills ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| c) Filter gaskets and seating ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | i) Exhaust dampers ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| d) Pumps ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | j) Diverter valves ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| e) Solvent tanks and containers-- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | k) Cartridge filter housings | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| f) Water separators ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | | | | |
4. Which method(s) of detection (is/are) used by the responsible official?
- | | |
|---|---|
| a) Visual examination (condensed solvent on exterior surfaces) ----- | a) <input checked="" type="checkbox"/> |
| b) Physical detection (airflow felt through gaskets) ----- | b) <input checked="" type="checkbox"/> |
| c) Odor (noticeable perc odor) ----- | c) <input checked="" type="checkbox"/> |
| d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) ----- | d) <input type="checkbox"/> **(see below) |
| e) Halogen leak detector ----- | e) <input type="checkbox"/> |
- **If using direct-reading instrumentation, is the equipment:** ----- ** N/A
- | | | |
|--|---------------------------------|-----------------------------|
| 1) Capable of detecting perc vapor concentrations in a range of 0-500 ppm? ----- | 1) <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2) Calibrated against a standard gas prior to and after each use (PID/FID only)? ----- | 2) <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3) Inspected for leaks and obvious signs of wear on a weekly basis? ----- | 3) <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4) Kept in a clean and secure area when not in use? ----- | 4) <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5) Verified for accuracy by use of duplicate samples (calorimetric only)? ----- | 5) <input type="checkbox"/> Yes | <input type="checkbox"/> No |

WandaParker-Garvin

6/11/2008

Inspector's Name (Please Print)

Date of Inspection

Wanda Parker Garvin

Inspector's Signature


Approximate Date of Next Inspection









COMMENTS: The entitlement expired on 8/9/2006 and the facility was referred for enforcement.

**FDEP Multimedia Program - DRY CLEANERS SECTOR
Inspection Checklist (Part II)**

Facility Name :	Red Bug Cleaners
Facility Address :	5275 Red Bug Lake Road, Winter Springs, FL 32708
Date/Time :	June 11, 2008/10:30pm
Persons present :	Wanda Parker-Garvin - FDEP; Gun Kim
Responsible Official :	Gun Kim
Phone/Email :	407-696-4440

Hazardous Waste Requirements

{  indicates potential SNCs }

Inspection Question	Rule Reference	Answer
General Records:		
• Type of facility? (CESQG, SQG, LQG*)		<input checked="" type="checkbox"/> CESQG <input type="checkbox"/> SQG
• Generator ID #:		
Preparedness & Prevention		
 Employee notification system?	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 265.32(a)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
 Device to summon emergency response agencies?	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 265.32(b)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
 Portable fire extinguishers and spill control equipment?	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 265.32(c)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
 Adequate fire suppression equipment?	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 265.32(d)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
 Program to test emergency equipment?	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 265.33]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
 Minimized possibility of spills and releases	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 265.31]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Contingency Planning:		
 Designated emergency coordinator?	SQG [40 CFR 262.34(d)(4)(i)] LQG [40 CFR 265.55]	
• Posted names and telephone numbers of emergency coordinators, locations of fire alarms and extinguishers, fire department telephone numbers, and evacuation routes?	SQG [40 CFR 262.34(d)(4)(ii)] LQG [40 CFR 265.52]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Storage of hazardous waste:		
• The facility must not be storing quantities of waste in excess of the quantity storage limits. To determine whether the facility is in compliance calculate the total weight of all perc waste in the storage area as follows:	Maximum quantity limits are: CESQG = 2,200 lbs SQG = 13,200 lbs	
• For 15-gal containers: # of containers $2 \times 120 \text{ lbs/container} = \text{lbs stored}$		240
• For 30-gal containers: # of containers $2 \times 240 \text{ lbs/container} = \text{lbs stored}$		520
 Are containers marked with an accumulation start date?	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 262.34(a)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**FDEP Multimedia Program - DRY CLEANERS SECTOR
Inspection Checklist (Part II)**

Is the facility in compliance with quantity and time limits for HW storage?		
➡ SQG: is waste kept onsite ≤ 180 days?	SQG [40 CFR 262.34(d)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
➡ LQG*: is waste kept onsite ≤ 90 days?	LQG [40 CFR 262.34(a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
• Is there satellite accumulation?	SQG [40 CFR 262.34(c)] LQG [40 CFR 262.34(c)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
• If applicable, are satellite areas at/near the point of generation?	SQG [40 CFR 262.34(c)] LQG [40 CFR 262.34(c)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
➡ Are containers labeled with the words "Hazardous Waste"?	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 262.34(a)(3)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
➡ Are containers in good condition and kept closed?	SQG [40 CFR 262.34(d)(2),(4)] LQG [40 CFR 262.34(a)(1)(i)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Are containers compatible with contents?	SQG [40 CFR 262.34(d)(2)] LQG [40 CFR 262.34(a)(1)(i)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Adequate aisle space and clearly marked exits?	SQG [40 CFR 262.34(d)(4)] LQG [40 CFR 265.35]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Are weekly inspections conducted and documented? [62-730.160(6) F.A.C.]	SQG [40 CFR 262.34(d)(2)] LQG [40 CFR 265.174]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Are hazardous waste containers stored on a crack-free surface that will contain leaks or spills?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Is there adequate secondary containment?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Is entrance by unauthorized people restricted?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Does the storage area have appropriate signage?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Record keeping		
• Are manifests properly completed?	SQG [40 CFR 262 subpart B] LQG [40 CFR 262 subpart B]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
➡ Are the originals present?	SQG [40 CFR 262 subpart B] LQG [40 CFR 262 subpart B]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Exception reports?	SQG [40 CFR 268.44] LQG [40 CFR 268.42]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
➡ LDR completed?	SQG [40 CFR 268.7] LQG [40 CFR 268.7]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
➡ Are logs, shipping records, manifests kept at the facility for at least three years?	CESQG [62-730.030(4) F.A.C.] SQG [40 CFR 262.44] LQG [40 CFR 262.40]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
➡ Does the facility ensure waste disposal to a permitted facility?	CESQG [40 CFR 261.5(g)(3)] SQG [40 CFR 262.12(c)] LQG [40 CFR 262.12(c)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Employee Training		
➡ Are employees trained in HW management?	SQG [40 CFR 262.34(d)(5)(iii)] LQG [40 CFR 265.16(a)&(b)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the facility in the dry cleaner solvent clean-up program? If so, what is the Facility ID #?	376.303, F.S.	9500425
Are dikes or other containment structures installed around each machine or item of equipment in which dry cleaning solvents are used and around any area in which solvents or waste-containing solvents are stored?	376.3078(9)(a), F.S.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were all spills of more than 1 quart of dry cleaning solvent outside of a containment structure, on or after July 1, 1995, reported by the owner or operator to the state through the State Warning Point?	403.161(1)(d), F.S.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If a spill occurred, did the owner or operator immediately upon the discovery of such a spill, initiate and complete actions to abate the source of the spill?	403.161(11)(d), F.S.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

**FDEP Multimedia Program - DRY CLEANERS SECTOR
Inspection Checklist (Part II)**

AST/UST Questions:

Inspection Question	Answer
Does the facility store petroleum products in a UST or AST?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

Separator Water Treatment System Questions:

Inspection Question	Answer
Is a separator water treatment system employed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Is the treatment system directly plumbed to the dry cleaning unit? If so, is it within secondary containment?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Does the system include a filter to reduce the concentrations of chlorinated solvent(s) in the wastewater prior to evaporation or discharge?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are records available to demonstrate that the filters have been changed in accordance with the manufacturer's recommendations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are wastewaters that contain soaps, detergents, chlorine, rust, etc. excluded from the treatments system in order to ensure that the filter is effective to treat the chlorinated solvents?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

Industrial Wastewater Standards

Inspection Question:	Rule Reference	Answer
Does the facility discharge separator water, mop water from cleaning the work area, and vacuum return water to a sewer, tank, evaporator system provided with a filter to reduce chlorinated solvent concentrations, or container, and never to septic?	62.660 F.A.C.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are solvent-based pre-spotters excluded from use on garments that are being laundered in a system that discharges to septic?	62.600 F.A.C.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the vacuum vent upward so that condensed solvent-containing water is returned to the vacuum tank rather than discharged onto ground?	403.087 F.S.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the boiler configured so that no contact water (separator water or vacuum return water) is introduced and can be discharged to the ground during the boiler bleed-off?	403.087 F.S.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If the facility discharges to surface waters, is it in compliance with NPDES?	62.620 F.A.C.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If the facility discharges to the ground, is it in compliance with a state permit?	62.620 F.A.C.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If the facility discharges to sewer, is it in compliance with local sewer permit?	62.625 F.A.C.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Is the facility on sewer other than POTW?	64 E-G	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

**FDEP Multimedia Program - DRY CLEANERS SECTOR
Inspection Checklist (Part II)**

Dry Cleaning Equipment

Type	Manufacturer	Serial Number	Capacity	Age

Other

The entitlement expired on 8/9/2006 and the facility was referred for enforcement.

Wanda Parker Harwin