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

Facility Name :	Red Bug Cleaners
Facility Address :	5275 Red Bug Lake Rd. Winter Springs, FL 32708
Date/Time :	March 24, 2010/10:29am
Persons present :	Gun Kim, Manager Danielle D. Owens, FDEP
Responsible Official :	Sun Kim, Owner
Phone/Email:	(407)696-4440

Hazardous Waste Requirements { ▶ indicates potential SNCs }

Inspection Question	Rule Reference	Answer						
Generator Determination:								
 Days/week operate dryclean unit(s) 		5 days/wk						
 Pounds of clothes drycleaned per day 		140 lbs						
 Gallons of separator water generated per day 	Do not count if hardpiped to treatment system.	1 gal						
 How often is sludge/muck scraped per week? 		1 per/wk						
Pounds of sludge/muck collected per scraping		4.5 lbs						
How often are filters changed?		2 per/yr						
How many filters per change?		8						
Sum above information to determine status:	⊠ CESQG [SQG LQG*						
CESQG: < 100 kg/month SQG: 100-1000 kg/r	nonth LQG: >1000 kg	g/month						
Preparedness & Prevention								
Employee notification system?	SQG [40 CFR 262.34(d)(4)]	⊠ Yes □ No						
Device to summon emergency response agencies?	SQG [40 CFR 262.34(d)(4)]	⊠ Yes □ No						
Portable fire extinguishers and spill control equipment?	SQG [40 CFR 262.34(d)(4)]	⊠ Yes □ No						
Are employees trained in HW management?	SQG [40 CFR 262.34(d)(5)(iii)]	☐ Yes ☐ No						
Program to test emergency equipment?	SQG [40 CFR 262.34(d)(4)]	☐ Yes ⊠ No						
Minimized possibility of spills and releases	SQG [40 CFR 262.34(d)(4)]	☐ Yes ⊠ No						
Contingency Planning:								
Designated emergency coordinator?	SQG [40 CFR 262.34(d)(4)(i)]	Gun Kim, Manager						
 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)]	⊠ Yes □ No						
Storage of hazardous waste:								
 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:	240 lbs							

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*If the facility is an LQG then please refer to the Hazardous Waste Section for inspection.

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# of containers2 x 120 lbs/container = lbs stored				
For 30-gal containers:				
	# of containers x 240 lbs/container = lbs store			
•	Are all HW containers marked with an	SQG [40 CFR 262.34(d)(4)]	☐ Yes ☐ No	
	accumulation start date?			
	If not, how long have they been on-site?		N/A	
•	SQG: is waste kept onsite ≤ 180 days?	SQG [40 CFR 262.34(d)]	│	
•	Is there satellite accumulation?	SQG [40 CFR 262.34(c)]	☐ Yes ☐ No ☒N/A	
•	If applicable, are satellite areas at/near the point of generation?	SQG [40 CFR 262.34(c)]	☐ Yes ☐ No ☒N/A	
•	Are containers labeled with the words "Hazardous Waste"?	SQG [40 CFR 262.34(d)(4)]	☐ Yes	
	If not, percentage of HW containers not labeled:		%-59% ⊠ >60%	
•	Are containers in good condition and kept closed?	SQG [40 CFR 262.34(d)(2),(4)]	⊠ Yes □ No	
•	Are containers compatible with contents?	SQG [40 CFR 262.34(d)(2)]	X Yes No	
•	Adequate aisle space between waste containers?	SQG [40 CFR 262.34(d)(4)]	X Yes No	
•	Are weekly inspections conducted and documented? [62-730.160(6) F.A.C.]	SQG [40 CFR 262.34(d)(2)]	☐ Yes ⊠ No	
Recor	rdkeeping			
•	Are manifests available for the past three years?	CESQG [62-730.030(4) F.A.C.] SQG [40 CFR 262.44]	⊠ Yes □ No	
•	If so, are manifests properly completed?	SQG [40 CFR 262 subpart B]		
•	Are the originals present?	SQG [40 CFR 262 subpart B]	Yes No N/A	
•	Exception reports?	SQG [40 CFR 268.44]	Yes No N/A	
•	LDRs completed?	SQG [40 CFR 268.7]	Yes No N/A	
•	Does the facility ensure waste disposal to a permitted facility?	CESQG [40 CFR 261.5(g)(3)] SQG [40 CFR 262.12(c)]	⊠ Yes □ No	
Drv C	leaner Stds.			
Is	the facility registered and display its registration acard?	376.303, F.S	⊠ Yes □ No	
Is the facility in the dry cleaner solvent clean-up program? If so, what is the Facility ID #?		376.303, F.S.	⊠Not in Program	
Are	e floor areas where solvent (product and waste) is anaged or stored rendered impermeable to solvent?	376.3078(9)(a), F.S.	☐ Yes ☐ No	
Are all containers of solvent product or solvent waste		376.3078(9)(a), F.S.	☐ Yes ☐ No	
within secondary containment?				
Have all spills of more than 1 quart of dry cleaning		403.161(1)(d), F.S.	Yes No	
solvent outside of a containment structure been			N/A	
reported to the State Warning Point by the			<u>~ 4</u>	
	/ner/operator?			
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.	☐ Yes ☐ No ☑N/A	

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Separator Water Treatm	nent System Questions:					
Inspection Question				Answer		
Is a separator water treatment system employed?						No
If so, is it within secondary containment?					Yes 🛛 No	o □N/A
Does the system include the	ne proper filter?				⊠ Yes □ No	o □N/A
	emonstrate that the filters ha	ve			Yes 🛛 No	o □N/A
been changed in accordance with the manufacturer's						
recommendations?						
Are spent filters disposed of					Yes No	
	ain soaps, detergents, chlori e treatments system in ordei				⊠ Yes □ No	o □N/A
	ctive to treat the chlorinated					
solvents?						
la la de al Martana C						
Industrial Wastewater S Inspection Question:	<u>standards</u>		Rule Reference	•••	Answe)r
Facility on septic or sewer	7		Nuie Neierenc	·C	Sewer Septic	
Vacuum water discharged						Tx system
vacuum water discharged to.				Ground	Sink/Toilet	
Mop water discharged to:					Tx system	
					Ground	Sink/Toilet
Are solvent-based spotters used on laundry (non-					☐ Yes	$oxed{oxed}$ No
drycleaned) garments? If the facility discharges to sewer, is it in compliance with			62.625 F.A.C.			
local sewer permit?					│	o ⊠N/A
Dry Cleaning Equipmer	nt					
Type	Manufacturer^	Мо	del Number^	Capacity^		Age^
Dry to Dry	Multimatic	Mercury F 4		45 lbs	3	1995
Other						
Number Employees	Years in Operation	Drinking Water				
4		\boxtimes	City Well			
Notes by Inspector						

Non-Compliance items: 1) Facility does not have a log of dates of when dry cleaning system components were inspected for leaks and could not provide documentation of leak detections being conducted. Facility does not utilize a halogen leak detector (HDL) to detect leaks despite having one available for use. The owner was instructed that the HDL must be used, according to manufacturer's instructions, to detect leaks. 2) Hazardous waste storage containers are not kept in secondary containment. 3) The lid to the misting unit was not in place leaving contents open to the atmosphere. Mr. Kim placed the lid on the unit during the inspection. 4)Rags possibly soiled with perc were not properly disposed of. There were several rags laying on the floor and the machine. Mr. Kim placed the soiled rags in the hazardous waste containers during the inspection. 5)The floor surrounding the perc machine and hazardous waste storage area not properly sealed. 6)Hazardouse waste containers not labeled "Hazardous Waste". Mr. Kim had labels available and placed them on the storage containers during the inspection.

Non-copliance items #1 and #2 were previously cited in the inspection conducted on March 26, 2009. Mr. Kim was advised about Best Management Practices (BMPs) and Good Housekeeping Practice. Also, Mr. Kim was given a copy of the Warning Letter that was issued on November 12, 2009 based on violations found during the March 26, 2009 inspection. Mr. Kim had failed to respond to the mailed copy of the letter. He was advised to contact the Department immediately regarding the Warning Letter.

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