



Florida Department of Environmental Protection

Tallahassee Branch Office
630-3 Capital Circle Northeast
Tallahassee, Florida 32301

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 24, 2009

Phil Gorgas
Concord Custom Cleaners #019
Post Office Box 55910
Lexington, Kentucky 40555

Dear Mr. Gorgas:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The permit **expires August 10, 2011**. The program identification number for this facility is **0730084**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the inspection results, the Tallahassee Branch Office reported a facility status of **Non-Compliance** for the following:

The Code of Federal Regulations 40 CFR Part 63 Air Emissions Standards for Dry Cleaning Facilities (7/27/2006) requires the use of a halogenated hydrocarbon detector or PCE gas analyzer. Monthly inspections are now required. Your facility was not equipped with or did not have access to such a device.

Note that your compliance status may be subject to further review by the District Program Office.

In order to complete the yearly inspection process, the enclosed "Annual Compliance Certification Form" will also have to be submitted. Please fill out your relevant sections of the form, including the Annual Reporting Period. The last recorded end date on your previously submitted form appears to be **December 31, 2007**. Please check your compliance status box, sign and date the bottom of the form, and return or mail the form back to this office. You may keep the yellow copy for your records.

Phil Gorgas
Concord Cleaners
April 24, 2009
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The assistance you provided is appreciated. You are encouraged to review the enclosed inspection checklist and its comments section. If you have any questions, your local contact is Tracy White at (850) 488-3704 or tracy.a.white@dep.state.fl.us.

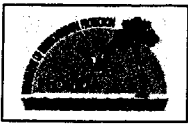
Sincerely,



Marlane Castellanos
Branch Manager

MC/tw
Enclosures

cc: Rick Bradburn, FDEP, Pensacola
Mary Beth Curle, FDEP
Erica Mitchell, FDEP



PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730084 **DATE:** 4-15-2009 **ARRIVE:** 1:30 P.M. **DEPART:** _____

FACILITY NAME: CONCORD CUSTOM CLEANERS #019

FACILITY LOCATION: 2910 Kerry Forest Pkwy
TALLAHASSEE 32309-6892

OWNER/AUTHORIZED REPRESENTATIVE: PHIL GORGAS **PHONE:** (859)422-4800

CONTACT NAME: _____ **PHONE:** _____

ENTITLEMENT PERIOD: 8/10/2006 / 8/10/2011
(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>

5. Ineligible for General Permit
 drop store/out of business/petroleum facility exceeds above limits

B. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 105 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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) -----	<input checked="" type="checkbox"/>
b) Physical detection (airflow felt through gaskets) -----	<input checked="" type="checkbox"/>
c) Odor (noticeable perc odor) -----	<input checked="" type="checkbox"/>
d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) -----	<input type="checkbox"/> ** (see below)
e) Halogen leak detector -----	<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

Tracy White

4-15-2009

Inspector's Name (Please Print)

Date of Inspection

Tracy White
Inspector's Signature

6-12 months

Approximate Date of Next Inspection

COMMENTS:

I met with Kathy Ward, Store Manager. Ms. Ward provided the records as requested. Perc rolling total for March 09 was at 105 gallons. The store had ceased Perc operations (see last inspection report), but resumed operations in February 2009. The machine was never removed and is a 1250 VIC machine. The machine manufacture date is unknown.

Perc was taken from the machine located at the store closing at Capital Circle NE (ARMs I.D. 0730087). The Perc from Store #081 was evenly divided among Store #019 and Store #201. Ms. Ward, former manager at Store #081, provided the final recordkeeping for that location as well.

I viewed the machine. The machine was in the dry cycle and was approaching cool-down. The digital temperature gauge was visible on the front. The temperature never went below 56 degrees (F).

Ms. Ward did not have a halogen leak detector at the site. She did not appear to share one with any other store.

EPA/FDEP Notification of Compliance information (due on July 28, 2008) appeared to have been reviewed and a review date of 3/05/2009 was entered into GPCI, but no entry in ARMs (FDEP computer record) was noted. However the information appears to have been received. See attached.

Recommendations:

The condenser exhaust temperature during cool down should reach 45 degrees (F) or less. The machine was at 56 degrees. Please repair the machine so the proper temperature is obtained and displayed during cool down.

The facility appears to be non-compliant for the following:

A halogen leak detector is required for monthly leak checks. Please obtain a detector and record leak checks. See attached documentation (July 31, 2008 letter) for more details.

GPCI Lite - Microsoft Internet Explorer

Address: http://appprod.dep.state.fl.us/GPCI/ca_activity_u.asp?bxfacID=4949&actnum=263585&screen=act

Compliance Activity for Facility 0730084

Activity List New Compliance Activity Delete Activity

CA: TRPT Office: NWD NW: PENSACOLA

Activity: MRR - Miscellaneous Report Review

Activity CS: IN VCS:

Date Done: 03/05/2009 (MM/DD/YYYY) Date Due: (MM/DD/YYYY)

Notes: Notification of compliance status - 40CFR63

Staff Assigned (Office): Available Staff: BRADBURN_R (NWD), CURLE_M (NWD), FANCHER_D (NWD), FLECK_J (NWD), JACKSON_A (NWD) Assigned Staff: LANDRY_G (NWD)

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Florida Department of Environmental Protection - Enterprise Applications

Details permit Compl asst Pollutant related party Help Return exit Window

19 Air Resource Management System - Facility

AREA NWDT LEON

CONCORD CUSTOM CLEANERS CONCORD CUSTOM CLEANERS #019

2910 Kerry Forest Pkwy
TALLAHASSEE

16	765.98	3382.13	30	32	31.5708	84	13	39.1584
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N 10 AG

Enter the FACILITY COMMENT

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Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 31, 2008

Dear Dry Cleaning Facility Owner/Operator:

On July 27, 2006, the Environmental Protection Agency (EPA) amended the federal standard for dry cleaners using perchloroethylene (40 CFR Part 63, Subpart M). The amendment established several new requirements. Dry cleaning machines installed before December 21, 2005 must be in compliance with the new standards as of July 28, 2008. Any machines installed after December 21, 2005 must be in compliance upon startup. One of the new requirements is that all dry cleaners must conduct monthly inspections for perchloroethylene (PCE) leaks, using a halogenated hydrocarbon detector or PCE gas analyzer. Facilities are also required to maintain appropriate records of these checks and to repair vapor leaks within 24 hours of detection, unless parts must be ordered. Also, the amendment requires the owner or operator of a PCE dry cleaning facility to submit, by registered mail, a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy:

- (1) The name and address of the owner or operator;
- (2) The address (that is, physical location) of the dry cleaning facility;
- (3) If they are located in a building with a residence(s), even if the residence is vacant at the time of this notification;
- (4) If they are located in a building with no other tenants, leased space, or owner occupants;
- (5) Whether they are a major or area source;
- (6) The yearly PCE solvent consumption based upon the yearly solvent consumption calculated according to 40 CFR 64.323(d);
- (7) Whether or not they are in compliance with each applicable requirement of 63.322; and
- (8) All information contained in the statement is accurate and true.

Please be advised that failure to comply with the above-mentioned requirement may result in enforcement action. A copy of 40 CFR 63.322 (referenced in item 7 above) is enclosed. If you have any questions regarding this letter, please contact me at 850/595-8300, extension 1223.

Sincerely,

Erica Mitchell

Erica Mitchell
Air Compliance Supervisor

RB/em/c
Enclosure

DRY CLEANER AIR QUALITY GENERAL PERMIT ANNUAL COMPLIANCE CERTIFICATION FORM

FACILITY NAME: _____	DATE: _____
FACILITY LOCATION: _____	

Annual Reporting Period: _____ 20 ____ TO _____ 20 ____

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:

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 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: _____
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.