



Florida Department of Environmental Protection

Northwest District Branch Office
3900 Commonwealth Boulevard, MS 55
Tallahassee, Florida 32399-3000

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

October 15, 2010

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.

The Tallahassee Branch Office reported a facility status of In Compliance. Note that your compliance status may be subject to further review by the District Program Office.

The assistance you provided is appreciated. The inspection report is enclosed. If you have any questions, your local contact is Tracy White at (850) 245-2960 or tracy.a.white@dep.state.fl.us.

Sincerely,

Marlane Castellanos
Branch Manager

MC/tw

Enclosures

cc: Rick Bradburn, Mary Beth Curle, FDEP, Pensacola.



PERCHLOROETHYLENE DRY CLEANERS



Environmental Compliance

COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730084	DATE: <u>10/07/2010</u>	ARRIVE: _____	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	
Email: _____		Mobile: _____	
CONTACT NAME:		PHONE:	
Email: _____		Mobile:	
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>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>5. Ineligible for General Permit <input type="checkbox"/> d rop store/out of business/petroleum / facility exceeds above limits</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>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>
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B. The sum of the volume of all perchloroethylene (perc) purchases made in each of the previous 12 months by this dry cleaning facility was _____ gallons.

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

(check only one box for each question)

1. Is all perc, and wastes containing perc, in tightly sealed & impervious containers? ----- Yes No N/A
2. Are all perc. containers leak free? ----- Yes No N/A
3. Are all machine doors kept closed and secured except during loading/unloading? ----- Yes No
4. Are cartridge filters drained in their housing or in sealed containers for at least 24 hours prior to disposal? ----- 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.1.-4. Classification: page 1 of 4, this form)

1. If the facility classification is an **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 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*
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 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

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

B. For all existing large or new large area sources:

1. 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 exhaust temperature at the condenser inlet and outlet measured 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 perc concentration equal to, or less than 100 ppm? ----- Yes No 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
5. Are transfer machines equipped (dryers, reclaimers, and washers) with individual condenser coils? ----- Yes No N/A
6. Is airflow routed to the carbon adsorber (if used) at all times? ----- Yes No N/A

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

(check only one box for each question)

1. Are receipts maintained for all perc purchased? ----- Yes No
2. Are rolling monthly totals of yearly perc consumption maintained? ----- Yes No
3. Are leak detection inspection and repair reports maintained for the following:
 - a) Of any leaks repaired w/in 24 hrs? or; ----- Yes No N/A
 - b) Of any 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. Is calibration data maintained for applicable direct reading instruments? ----- Yes No N/A
5. Is exhaust duct monitoring data on perc concentrations maintained? ----- Yes No N/A
6. Is a startup/shutdown/malfunction plan maintained for each machine? ----- Yes No
7. Are deviation reports maintained? ----- Yes No N/A
 - a) Problem corrected? ----- Yes No N/A
8. Is a compliance plan maintained, 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. What type of leak detection equipment is used to detect leaks?
 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 halogenated hydrocarbon detector 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, 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)

a) Hose connections, fittings, couplings, and valves ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A b) Door gaskets and seating ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A c) Filter gaskets and seating ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A d) Pumps ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A e) Solvent tanks and containers -- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A f) Water separators ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	g) Muck cookers ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A h) Stills ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A i) Exhaust dampers ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A j) Diverter valves ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A k) Cartridge filter housings <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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8. 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)*)

a) Hose connections, fittings, couplings, and valves ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A b) Door gaskets and seating ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A c) Filter gaskets and seating ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A d) Pumps ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A e) Solvent tanks and containers -- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A f) Water separators ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	g) Muck cookers ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A h) Stills ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A i) Exhaust dampers ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A j) Diverter valves ----- <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A k) Cartridge filter housings <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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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 :

Tracy White

10/07/2010

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

I initially received a phone call from Phil Gorgas. Mr. Gorgas explained that the facility was now inactive and that all Perc-related equipment had been removed from the facility. He indicated that he had sent the Department a letter dated April 30, 2010. I did not appear to have a copy of the letter. I requested a copy from him.

The letter indicated that "This location is no longer an active dry cleaning plant and effective 4-10-2010 has been converted to a Drop-off location."

I told Mr. Gorgas that I would inspect his facility one more time, and then forward his letter and a copy of my final inspection report to the General Permitting Division office. I will request that they make the facility inactive in the computer system.

I observed the site on 10/07/2010. Mr. Gorgas's letter indicated a drop off site. However, I could not locate the drop off site. In the place of the former cleaners was a newly established business. I did not note any Hazardous wastes materials or Perc-related equipment in the vicinity. The facility appeared to be inactive.

Note: The inspection checklist was not fully completed due to insufficient information (facility is now inactive).