**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**
NORTHWEST DISTRICT OFFICE
470 HARRISON AVENUE
PANAMA CITY, FLORIDA 32401

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

February 20, 2013

BY ELECTRONIC MAIL
rupertscleaners@comcast.net

Ms. Cynthia Brown
Rupert's Cleaners
2320 Jenks Avenue
Panama City, Florida 32405

Dear Ms. Brown:

On February 15, 2013, a Department representative with the Air Resource Management Program inspected the Rupert's Cleaners Dry Cleaning Facility ID 0050068. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact C. Mark Sumner at 850/767-0046, or *mark.c.sumner@dep.state.fl.us*.

Sincerely,

Michael Mathews
Environmental Manager

MM/ms

Enclosure
c: Ms. Mary Beth Curle, FDEP Pensacola (mary.beth.curle@dep.state.fl.us)
Ms. Carol Melton, FDEP Pensacola (carol.melton@dep.state.fl.us)

# PERCHLOROETHYLENE DRY CLEANERS

## COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

**INSPECTION TYPE:** ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

**AIRS ID#:** 0050068 **DATE:** 2/15/13 **ARRIVE:** 9:45 **DEPART:** 10:50

**FACILITY NAME:** RUPERT'S CLEANERS

**FACILITY LOCATION:** 2320 JENKS AVE

PANAMA CITY 32405-4300

**OWNER/AUTHORIZED REPRESENTATIVE:** CYNTHIA BROWN **PHONE:** (850)785-1907
**Email:** rupertscleaners@comcast.net **Mobile:**
**CONTACT NAME:** CYNTHIA BROWN **PHONE:** (850)785-1907
**Email:** rupertscleaners@comcast.net **Mobile:**
**ENTITLEMENT PERIOD:** 3/9/2008 (effective date) / 3/9/2013 (end date) (New Application Submitted on 2/8/2013)

**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)

**A. 1. Existing small area source** ☐
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)

**2. New small area source** ☐
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)

**3. Existing large area source** ☒
dry-to-dry only, 140 ≤ x ≤ 2,100 gal/yr
transfer only, 200 ≤ x ≤ 1,800 gal/yr
both types, 140 ≤ x ≤ 1,800 gal/yr
(constructed before 12/9/91)

**4. New large area source** ☐
dry-to-dry only, 140 ≤ x ≤ 2,100 gal/yr
transfer only, 200 ≤ x ≤ 1,800 gal/yr
both types, 140 ≤ x ≤ 1,800 gal/yr
(constructed on or after 12/9/91)

**5. Ineligible for General Permit** ☐
d rop store/out of business/petroleum /
facility exceeds above limits

**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 120.00 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 d rained 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 f acility 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 fa cility 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$^{o}$ 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 exhaus t 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: <u>RECORDKEEPING REQUIREMENTS</u> – 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 total s 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 ---------- | ☒ Yes | ☐ No | ☐ N/A | g) Muck cookers -------- | ☐ Yes | ☐ No | ☒ N/A |
| b) Door gaskets and seating ------ | ☒ Yes | ☐ No | ☐ N/A | h) Stills ---------- | ☒ Yes | ☐ No | ☐ N/A |
| c) Filter gaskets and seating ------ | ☒ Yes | ☐ No | ☐ N/A | i) Exhaust dampers ----- | ☒ Yes | ☐ No | ☐ N/A |
| d) Pumps ---------- | ☒ Yes | ☐ No | ☐ N/A | j) Diverter valves --------- | ☒ Yes | ☐ No | ☐ N/A |
| e) Solvent tanks and containers -- | ☒ Yes | ☐ No | ☐ N/A | k) Cartridge filter housings | ☒ Yes | ☐ No | ☐ N/A |
| f) Water separators ---------- | ☒ Yes | ☐ No | ☐ N/A | | | | |

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 ---------- | ☒ Yes | ☐ No | ☐ N/A | g) Muck cookers -------- | ☐ Yes | ☐ No | ☒ N/A |
| b) Door gaskets and seating ------ | ☒ Yes | ☐ No | ☐ N/A | h) Stills ---------- | ☒ Yes | ☐ No | ☐ N/A |
| c) Filter gaskets and seating ------ | ☒ Yes | ☐ No | ☐ N/A | i) Exhaust dampers ----- | ☒ Yes | ☐ No | ☐ N/A |
| d) Pumps ---------- | ☒ Yes | ☐ No | ☐ N/A | j) Diverter valves --------- | ☒ Yes | ☐ No | ☐ N/A |
| e) Solvent tanks and containers -- | ☒ Yes | ☐ No | ☐ N/A | k) Cartridge filter housings | ☒ Yes | ☐ No | ☐ N/A |
| f) Water separators ---------- | ☒ Yes | ☐ No | ☐ N/A | | | | |

**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 :

C. Mark Sumner — Inspector's Name (Please Print)

2/15/2013 — Date of Inspection

Inspector's Signature

February 2014 — Approximate Date of Next Inspection

**COMMENTS:** Mr. Lee Brown, the manager, allowed me access to the facility's dry cleaning machines and provided me with all requested records. This facility operates two perc dry cleaning machines, one for dark colored fabrics, the other is for light colored fabrics. The facility uses a Met labs model 505A halogen leak detector for the required weekly leak checks. All the perc and wastes containing perc were in tightly sealed and impervious containers. The machine doors appeared to be kept closed except during loading and unloading. The cartridge filters are drained in their housing using centripetal force to limit the amount of perc in the waste filter. The waste filters are stored in a sealed and impervious container and records were maintained for the proper disposal. Receipts were reviewed for January 2012 to January 2013 for all perc purchased. This facility has purchased 120 gallons of perc during the last 13 months. A facility record is kept with the inspections, maintenance, and repairs documented. A startup/shutdown/malfunction plan was provided for the dry cleaning machines, and the plan appears to be updated to match the current conditions at this facility. No signs of perc leaks or spills were noted at the time of this inspection.