



# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

August 27, 2008

Randall Cothren  
Eagle Cleaners  
3185-C Capital Circle, NE  
Tallahassee, Florida 32308

Dear Mr. Cothren:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is 0730091. The permit **expires on July 22, 2012**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the inspection results, the Tallahassee Branch Office reported a status of **In-Compliance** for your facility. 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 have to be completed. 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 May 17, 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.

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](mailto: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



Environmental Compliance

## COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730091 DATE: \_\_\_\_\_ ARRIVE: \_\_\_\_\_ DEPART: \_\_\_\_\_

FACILITY NAME: EAGLE CLEANERS

FACILITY LOCATION: 3185-C Capital Circle NE  
TALLAHASSEE 32308-7798

OWNER/AUTHORIZED REPRESENTATIVE: RANDALL COTHREN PHONE: (904)531-0124

CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_

ENTITLEMENT PERIOD: 7/22/2007 / 7/22/2012  
(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. <b>Existing small area source</b> <input type="checkbox"/> dry-to-dry only, <math>x &lt; 140</math> gal/yr transfer only, <math>x &lt; 200</math> gal/yr both types, <math>x &lt; 140</math> gal/yr (constructed before 12/9/91)</p>	<p>2. <b>New small area source</b> <input checked="" type="checkbox"/> dry-to-dry only, <math>x &lt; 140</math> gal/yr transfer only, <math>x &lt; 200</math> gal/yr both types, <math>x &lt; 140</math> gal/yr (constructed on or after 12/9/91)</p>
<p>3. <b>Existing large area source</b> <input type="checkbox"/> dry-to-dry only, <math>140 \leq x \leq 2,100</math> gal/yr transfer only, <math>200 \leq x \leq 1,800</math> gal/yr both types, <math>140 \leq x \leq 1,800</math> gal/yr (constructed before 12/9/91)</p>	<p>4. <b>New large area source</b> <input type="checkbox"/> dry-to-dry only, <math>140 \leq x \leq 2,100</math> gal/yr transfer only, <math>200 \leq x \leq 1,800</math> gal/yr both types, <math>140 \leq x \leq 1,800</math> 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 116.6 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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?

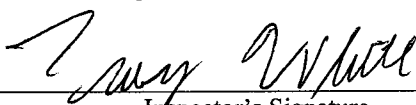
a) Visual examination (condensed solvent on exterior surfaces) -----	a) <input checked="" type="checkbox"/>
b) Physical detection (airflow felt through gaskets) -----	b) <input checked="" type="checkbox"/>
c) Odor (noticeable perc odor) -----	c) <input checked="" type="checkbox"/>
d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) -----	d) <input type="checkbox"/> ** (see below)
e) Halogen leak detector -----	e) <input checked="" 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

8/20/2008

Inspector's Name (Please Print)  
  
 Inspector's Signature

Date of Inspection  
 6-12 months  
 Approximate Date of Next Inspection

**COMMENTS:**

I met with Randall Cothren. He gave me the records that were requested. The records appeared to be maintained. The Perc total as of July 2008 was 116.6 gallons. He showed me his new perc leak detector.

I gave him a copy of the July 31, 2008 letter from the District office about the EPA notification requirement that was due July 28, 2008. Mr. Cothren asked about a notification form for this information requirement. I also provided a copy of the EPA regulation fact sheet from SBEAP.

I included a form in this report, from the SBEAP website, for his information.

I observed the machine. It was the same machine as last time, an ES 2000 model. I smelled some Perc odor around the back of the machine in the distiller area. The machine was in operation. I didn't note any visible leaks. I informed Mr. Cothren of the odor.

**Recommendations:**

Please submit the EPA notification requirements that were due July 28, 2008. I have included a form for your convenience. The Perc notification form to the EPA has a disclaimer notice at the bottom of the form. Please read the disclaimer statement.

## PERCHLOROETHYLENE (Perc) Dry Cleaning Notification to EPA & FLDEP

Each owner or operator of a Perc dry cleaning facility shall submit to the EPA and FLDEP by registered mail on or before **July 28, 2008** a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy:

FLDEP Facility ID Number: \_\_\_\_\_

The name and address of the owner or operator;

\_\_\_\_\_  
*Name of the owner or operator of the dry cleaning facility*

\_\_\_\_\_  
*Mailing address of the owner or operator of the dry cleaning facility*

\_\_\_\_\_  
*Mailing address line 2*

\_\_\_\_\_  
*City State Zip Code*

The address (that is, physical location) of the dry cleaning facility;

\_\_\_\_\_  
*Name of the dry cleaning facility*

\_\_\_\_\_  
*Address of the dry cleaning facility (physical location)*

\_\_\_\_\_  
*Address line 2*

\_\_\_\_\_  
*City State Zip Code*

Is the Perc dry cleaning machine located in a building with a residence(s), even if the residence is vacant at the time of this notification?

Check one:  No  Yes

Is the Perc dry cleaning machine located in a building with no other tenants, leased space, or owner occupants?

Check one:  No  Yes

Is the Perc dry cleaning operation a major or area source?

Major Source: Perc consumption is greater than 2100 gallons/year  
 Area Source: Perc consumption is 2100 gallons/year or below

The yearly Perc solvent consumption: \_\_\_\_\_ gallons  
*(How much Perc did you buy over the last 12 months?)*

Is the Perc dry cleaning operation in compliance with each applicable requirement of the Federal Standard of 40 CFR §63.322?

Check one:  No  Yes

All information contained in this statement is accurate and true.

\_\_\_\_\_  
*Signature of the Responsible Official for the dry cleaning facility*

By Registered Mail Send to: USEPA Region 4  
 Air Toxics and Monitoring Branch  
 61 Forsyth Street SW  
 Atlanta, Georgia 30303-8960

And to: Florida Department of Environmental Protection  
 General Permits Section  
 Bureau of Air Monitoring and Mobile Sources  
 2600 Blair Stone Road, MS #5510  
 Tallahassee, Florida 32399-2400

**DISCLAIMER:** You are required by rule to provide the above information; however, this form is not required and is only provided as a compliance tool.