



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

March 4, 2011

Jeff Crane
Morrow Cleaners
101 West Crawford Street
Quincy, Florida 32351-3117

Dear Mr. Crane:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is 0390035. The permit **expires on March 20, 2014**. This letter applies only to activities covered by the Air Resource Management Program.

The Tallahassee Branch Office reported a facility status of Non Compliance for the below issue:

Records, as required by DEP Form No. 62-213.900(2), Section 6, were not available for Department inspection on February 22, 2011.

Also, the enclosed "Annual Compliance Certification Form" is required. 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 **March 3, 2010**. 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. The inspection checklist and its comments section are enclosed. Your facility compliance status may be subject to further review by the District Program office. If you have any questions, your local contact is Tracy White at (850) 245-2960 or tracy.a.white@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads "Marlane Castellanos".

Marlane Castellanos
Branch Manager

MC/tw

Enclosures

cc: Rick Bradburn; Mary Beth Curle; Carol Melton (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#: 0390035 **DATE:** 2/22/2011 **ARRIVE:** 10:10 A.M. **DEPART:** _____

FACILITY NAME: MORROW CLEANERS

FACILITY LOCATION: 101 W CRAWFORD ST
QUINCY 32351-3117

OWNER/AUTHORIZED REPRESENTATIVE: JEFF CRANE **PHONE:** (850)875-4100
Email: **Mobile:**

CONTACT NAME: JEFF CRANE **PHONE:** (850)875-4100
Email: **Mobile:**

ENTITLEMENT PERIOD: 3/20/2009 / 3/20/2014
 (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)

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, $140 \leq x \leq 2,100$ 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)

4. **New large area source**
 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)

5. **Ineligible for General Permit**
 drop 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 _____ 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

2/22/2011

Inspector's Name (Please Print)

Date of Inspection

Follow up required.

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: I met with Doris Ritman. I requested the facility records. Ms. Ritman did not know the location of the records. She referred records requests to Jeff Crane. Mr. Crane was not at the site during inspection.

I observed the drycleaning machine. It was not in operation. No changes were noted. No issues were noted with waste storage. The PCE leak detector was not observed (location unknown).

Observations:

Records were not available for inspection. Records are required to be available for inspection. The facility is now in a non-compliance status for recordkeeping.

Note: The inspection checklist is incomplete due to insufficient information.

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
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*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.