Florida Department of Environmental Protection

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

May 6, 2008

Eddie Randolph
Randolph's Alterations & Dry Cleaners
615 West Fourth Avenue
Tallahassee, Florida 32303-6015

Dear Mr. Randolph:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is **0730093.** 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 **August 10, 2006.** 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.

Sincerely,

Cliff McKeown
Engineer Specialist

CM/tw
Enclosures
cc: Rick Bradburn, FDEP, Pensacola
Mary Beth Curle, FDEP
Erica Mitchell, FDEP

PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

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

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0730093 **DATE:** 4/23/2008 **ARRIVE:** 1:30 **DEPART:** 2:45

FACILITY NAME: RANDOLPH'S ALTERATIONS & DRY CLEANERS

FACILITY LOCATION: 615 West Fourth Ave

TALLAHASSEE 32303-6015

OWNER/AUTHORIZED REPRESENTATIVE: EDDIE RANDOLPH **PHONE:** (850)224-7230

CONTACT NAME: **PHONE:**

ENTITLEMENT PERIOD: 7/22/2007 (effective date) / 7/22/2012 (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 ≤ 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 ☐
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 135 gallons.

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

Does the responsible official of the dry cleaning facility:

(check ☑ only one box for each question)

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 ----------	☒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				

4. Which method(s) of detection (is/are) used by the responsible official?

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

****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)☐Yes ☐No
2) Calibrated against a standard gas prior to and after each use (PID/FID only)? ------- 2)☐Yes ☐No
3) Inspected for leaks and obvious signs of wear on a weekly basis? ---------- 3)☐Yes ☐No
4) Kept in a clean and secure area when not in use? ---------- 4)☐Yes ☐No
5) Verified for accuracy by use of duplicate samples (calorimetric only)? ---------- 5)☐Yes ☐No

Tracy White
Inspector's Name (Please Print)

Tracy N White
Inspector's Signature

4/23/2008
Date of Inspection

6-12 months
Approximate Date of Next Inspection

COMMENTS:

I met with Eddie Randolph. I observed the machine. It appeared to be the same Aero Tech model as with the last inspection. The machine was not in operation.

Mr. Randolph commented on the new water separator he had installed recently and several new parts he had installed on the machine. I did not note any significant leaks on the machine nor any strong odors. Waste containers had lids.

I asked Mr. Randolph if the machine's diverter valve filter had been serviced. It appeared to have a bag of carbon absorbant inside the retaining cup. He explained it had been serviced.

I asked Mr. Randolph where he read the condenser exhaust temperature during cool-down. He explained that he read it from the front LED display of the machine, but also pointed to the back of the machine to a temperature gauge at the condenser coil area for the dryer exhaust.

Both gauges appeared to be displayed in the Celsius scale, but Mr. Randolph has apparently recorded the readings on his calendar using the Farenheit scale. He also explained that his machine service representative had instructed him to read from the front of the machine and said that was the correct location to use.

I requested the contact information for the service representative and Mr Randolph immediately called him. I spoke with a Mr. Gary Wainwright, the original supplier of the machine. He didn't seem to have much information on the temperature gauges and did not seem to indicate that the gauges had been calibrated or adjusted recently. He indicated that the gauge on back of the machine, the "recovery temperature" gauge, was the correct gauge to read. This was contrary to the information I was provided from Mr. Randolph.

I requested that Mr. Randolph read from the gauge in back in the machine, but make sure the gauge was in proper working order and properly calibrated/adjusted. I also informed him to be sure and properly record his temperature readings in the scale listed on the gauge (Celsius or Farenheit). He also had the option of recording the pressures for the refrigeration unit, provided he knew what the optimal pressures were for both high and low (see manual for machine).

I asked Mr. Randolph if he had a machine manual. He could not locate one at the moment. He requested I send him a copy of the EPA manual.

Next I observed the 2007 and 2008 calendar for recordkeeping. Leak and temperature checks were recorded, although the temperature check may have been erroneous (unknown-will check for gauge procedure upon next inspection).

The rolling PCE totals and purchase receipts were maintained. March 2008 showed a total of 135 gallons.

I informed Mr. Randolph of the Small Business Assistance program sheet and the need for a halogen leak detector (or gas analyzer) starting July 27, 2008. He was checking his suppliers for one as I left the inspection site.

Recommendations:

Please use the correct readings for temperature recordkeeping. Failure to have accurate information recorded may result in a non-compliance status upon the next inspection.

It appears that a leak detection device will be required to be in use by July 27, 2008.