



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

CERTIFIED RETURN RECEIPT

August 7, 2009

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**. Your 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 **Non-Compliance** for your facility. The facility appeared to be non-compliant with the following:

"The non-compliance issues from the last inspection appear to have been corrected. However the facility will remain in a non-compliant status until the 'Perc Dry Cleaning Notification to EPA and FLDEP' information (also listed on the July 31, 2008 letter) is received and entered into Department record."

Additional copies of the notification materials are enclosed. Please complete and return the required information (to the addresses listed at the bottom of the form) **within 15 days receipt of this letter**.

Eddie Randolph
August 7, 2009
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The inspection checklist and its comments section are enclosed. The assistance you provided is appreciated. If you have any questions, your local contact is Tracy White at 850/488-3704 or 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



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730093 **DATE:** 7/30/2009 **ARRIVE:** _____ **DEPART:** _____
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 / 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. Existing 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 before 12/9/91)</p> | <p>2. New 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 on or after 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>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> |
| <p>5. Ineligible for General Permit <input type="checkbox"/>
 drop store/out of business/petroleum
 facility exceeds above limits</p> | |

B. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 94 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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input 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

7/30/2009

Inspector's Name (Please Print)

Date of Inspection

Tracy White

6-12 months

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

I met with Eddie Randolph. I requested the records. The 2008-2009 drycleaning calendars and 2008 perc receipts were available. No receipts were noted for 2009. Mr. Randolph explained that road construction in front of the facility had reduced business activity and as a result perc. purchases were also reduced.

The machine was in operation and in cool-down cycle. I asked Mr. Randolph where he read the temperature. He said the front, but later he pointed to a gauge in back of the machine, which appears to be the correct gauge to read from. The front digital temperature gauge did not display the correct temperature and did not match the temperature recorded in the calendars.

A leak detector was available and on site.

I asked Mr. Randolph if he had ever received the "Perc Dry Cleaning Notification to EPA and FLDEP" and the July 31, 2008 District letter to the Drycleaning facilities. He did not appear to be familiar with the form or letter. I gave him copies of the materials. Also I will include copies in this report.

On 8/06/2009 I reviewed Department records and could not locate any record of the EPA notification information having been received.

Recommendations:

The non-compliance issues from the last inspection appear to have been corrected. However the facility will remain in a non-compliant status until the "Perc Dry Cleaning Notification to EPA and FLDEP" information (also listed on the July 31, 2008 letter) is received and entered into Department record. See the inspection report cover letter for more information.

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.

AIRS 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

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

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

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.



Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 31, 2008

Dear Dry Cleaning Facility Owner/Operator:

On July 27, 2006, the Environmental Protection Agency (EPA) amended the federal standard for dry cleaners using perchloroethylene (40 CFR Part 63, Subpart M). The amendment established several new requirements. Dry cleaning machines installed before December 21, 2005 must be in compliance with the new standards as of July 28, 2008. Any machines installed after December 21, 2005 must be in compliance upon startup. One of the new requirements is that all dry cleaners must conduct monthly inspections for perchloroethylene (PCE) leaks, using a halogenated hydrocarbon detector or PCE gas analyzer. Facilities are also required to maintain appropriate records of these checks and to repair vapor leaks within 24 hours of detection, unless parts must be ordered. Also, the amendment requires the owner or operator of a PCE dry cleaning facility to submit, by registered mail, a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy:

- (1) The name and address of the owner or operator;
- (2) The address (that is, physical location) of the dry cleaning facility;
- (3) If they are located in a building with a residence(s), even if the residence is vacant at the time of this notification;
- (4) If they are located in a building with no other tenants, leased space, or owner occupants;
- (5) Whether they are a major or area source;
- (6) The yearly PCE solvent consumption based upon the yearly solvent consumption calculated according to 40 CFR 64.323(d);
- (7) Whether or not they are in compliance with each applicable requirement of 63.322; and
- (8) All information contained in the statement is accurate and true.

Please be advised that failure to comply with the above-mentioned requirement may result in enforcement action. A copy of 40 CFR 63.322 (referenced in item 7 above) is enclosed. If you have any questions regarding this letter, please contact me at 850/595-8300, extension 1223.

Sincerely,

Erica Mitchell

Erica Mitchell
Air Compliance Supervisor

RB/em/c
Enclosure