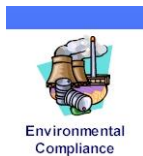




PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 103 0376	Date: 1/31/2011 Time In: 12:00PM Time Out: 12:35PM
Facility Name:	Yates Cleaners, Inc.
Facility Location:	710 Missouri Avenue South Clearwater, FL, 33756
Responsible Official:	Robert R. Yates Phone No: 727-446-1963
Emis. Unit Description:	New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine, 473 Real Star (1/95) with a refrigerated condenser. A 30 HP No. 2 fuel oil fired boiler is on-site.
Permit Number:	1030376-003-AG Exp. Date: 2/4/2012
Facility Contact:	Robert R. Yates Phone: 727-446-1963
Compliance Status:	<input checked="" type="checkbox"/> IN <input type="checkbox"/> MNC <input type="checkbox"/> SNC

PART I: NOTIFICATION (Check appropriate box)

- Existing facility notified DARM by 9/1/96
- New facility notified DARM 30 days prior to startup
- Facility failed to notify DARM to use general permit

PART II: CLASSIFICATION

Facility indicated on notification form that it is:
 No Notification Form Drop-Off Store Out of business Petroleum Solvent Only

- A.**
- | | |
|---|---|
| <u>1. Existing small area source</u>
Dry-to-dry only, x <140 gal/yr
Transfer only, x <200 gal/yr <input type="checkbox"/>
Both types, x <140 gal/yr
(Constructed before 12/9/91) | <u>2. New small area source</u>
Dry-to-dry only, x <140 gal/yr
Transfer only, x <200 gal/yr <input checked="" type="checkbox"/>
Both types, x <140 gal/yr
(Constructed on or after 12/9/91) |
| <u>3. Existing large area source</u>
Dry-to-dry only, 140> x <2,100 gal/yr
Transfer only, 200> x <1,800 gal/yr <input type="checkbox"/>
Both types, 140> x <1,800 gal/yr
(Constructed before 12/9/91) | <u>4. New large area source</u>
Dry-to-dry only, 140> x <2,100 gal/yr
Transfer only, 200> x <1,800 gal/yr <input type="checkbox"/>
Both types, 140> x <1,800 gal/yr
(Constructed on or after 12/9/91) |

This is a correct facility classification Y N Can not determine

If no, please check the appropriate classification:

- Facility qualified for a general permit as number 2 above.
 Facility exceeds above limits and is not eligible for a general permit

B. Highest 12-month consecutive total of perchloroethylene purchased in the preceding 12-month period: 36.74 Gallons. Month with highest use was April 2011 . Did facility exceed limits Y N

PART III: GENERAL CONTROL REQUIREMENTS

Is the responsible official of the dry cleaning facility: (Check appropriate boxes)

- | | | | |
|---|---------------------------------------|----------------------------|--|
| 1. Storing perchloroethylene in tightly sealed and impervious containers? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 2. Examining the containers for leakage? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 3. Closing and securing machine doors except during loading/unloading? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | |
| 4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> NA |

PART IV: PROCESS VENT CONTROLS

In Part II-A:

If classification (1) has been checked, no controls are required. **Proceed to Part V.**

If classification (2) has been checked, the machine should be equipped with a refrigerated condenser (complete A below)

If classification (3) has been checked, the machine should be equipped with either a refrigerated condenser or a carbon adsorber (complete A and B below). A Carbon adsorber must have been installed prior to September 22, 1993.

If classification (4) has been checked, machine should be equipped with a refrigerated condenser (complete A and B below.)

A. Has the responsible official of all new sources and existing large area sources: (check appropriate boxes)

- | | | | |
|--|---------------------------------------|----------------------------|--|
| 1. Equipped all machines with the appropriate vent controls? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 2. Equipped dry-to-dry machines with a closed-loop vapor venting system? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> NA |
| 6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |

B. Has the responsible official of an existing large or new large area source also:

- | | | | |
|---|---------------------------------------|----------------------------|-----------------------------|
| 1. Measured and recorded the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | |
| 2. Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly?
Is the temperature differential equal to or less than _____° F? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 3. Measured and recorded the _____ concentration _____ weekly at the end of the final drying cycle while the _____ is venting _____ machines are equipped with a carbon adsorber?
Is the per _____ or less than _____ ppm? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |

4. Assured 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?

Y N NA

5. Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?

Y N NA

6. Routed airflow to the carbon adsorber (if used) at all times?

Y N NA

PART V: RECORDKEEPING REQUIREMENTS

Has the responsible official:

(Check appropriate boxes)

1. Maintained receipts for perc purchased?

Y N

2. Maintained rolling monthly averages of perc consumption?

Y N

3. Maintained leak detection inspection and repair reports for the following:

a. Documentation of leaks repaired w/in 24 hrs? or;

Y N NA

b. Documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt?

Y N NA

4. Maintained calibration data? (*direct reading instruments only*)

Y N NA

5. Maintained exhaust duct monitoring data on perc concentrations?

Y N NA

6. Maintained startup/shutdown/malfunction plan?

Y N

7. Maintained deviation reports?

Y N NA

Problem corrected?

Y N NA

8. Maintained compliance plan, if applicable?

Y N NA

PART VI: LEAK DETECTION AND REPAIRS

1. Does the responsible official conduct weekly leak detection and repair inspection?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
2. Which method of detection does the responsible official use?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Visual examination (condensed solvent of exterior surfaces)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Physical detection (airflow felt through gaskets)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Odor (noticeable perc odor)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
If using direct-reading instrumentation, is the equipment:	<input type="checkbox"/> Y	<input type="checkbox"/> N
a. Capable of detecting perc vapor concentrations in a range of 0-500 ppm	<input type="checkbox"/> Y	<input type="checkbox"/> N
b. Calibrated against a standard gas prior to and after each use (PID/FID only).	<input type="checkbox"/> Y	<input type="checkbox"/> N
c. Inspected for leaks and obvious signs of wear on a weekly basis?	<input type="checkbox"/> Y	<input type="checkbox"/> N
d. Kept in a clean and secure area when not in use.	<input type="checkbox"/> Y	<input type="checkbox"/> N
e. Verified for accuracy by use of duplicate samples (calorimetric only)?	<input type="checkbox"/> Y	<input type="checkbox"/> N
3. Has the facility maintained a leak log?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
4. The following area should be checked for leaks by the operator:	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Hose connections, fitting couplings, and valves	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Door gaskets and seating	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Filter gaskets and seating	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Pumps	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Solvent tanks and containers	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Water separators	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Muck cookers	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Stills	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Exhaust dampers	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Diverter valves	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Cartridge Filter housing	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N

Shea Jackson	
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector's Signature	Date of Next Inspection

System Inspection and Leak Detection

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.) Y N NA

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).) Y N NA

- (1) Hose and pipe connections, fittings, couplings, and valves;
- (2) Door gaskets and seatings;
- (3) Filter gaskets and seatings;
- (4) Pumps;
- (5) Solvent tanks and containers;
- (6) Water separators;
- (7) Muck cookers;
- (8) Stills;
- (9) Exhaust dampers;
- (10) Diverter valves; and
- (11) All Filter housings

Is the halogenated hydrocarbon detector or PCE gas analyzer operated according to the manufacturer's instructions? Y N NA

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? Y N NA

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? Y N NA

Is the halogenated hydrocarbon detector capable of detecting vapor concentrations of PCE of 25 parts per million by volume 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? Y N NA

ADDITIONAL SITE INFORMATION

Facility Name: Yates Cleaners, Inc.
ARMS #: 103 0376

Inspection Comments:

- *During the inspection of this facility, I met with the responsible official, Mr. Robert Yates.*
- *I reviewed the calendars records for 2010 and 2011. The perchloroethylene usage, temperature and observation checks were up to date, the most recent check was performed on 1/24/2011. The temperature observation and checks were recorded as 2 - 6°C during the cool down cycle.*
- *The current Perc 12- month total was 37.6 gallons. The highest total was 37.6 gallons in April 2011. Mr. Yates stated there is still a reduction of dry cleaning demand; due to the economy at this time. The typical purchases are for 19.3 gallons. The most recent Purchase orders were 6/4/10 and 1/27/2011. The Hazardous waste disposals were, 10/2011 and 1/2011, Mr. Yates stated Safety Kleen is the vendor that picks up waste products. He had the Hazardous waste containers located in the boiler room outside of the shop, in secondary containment vessels. He had repainted the floor to protect the concrete from Perc spills.*
- *I observed the dry to dry machine and other equipment were not in operation at the time of inspection. I did not detect any perchloroethylene odors during the observation around the dry to dry machine. (See photos)*
- *The used second dry cleaning Model RS-373 machine is not operational does not contain Perc, only used for replacement parts.*
- *Mr. Yates has a Halogen Hi Tech 300 meter, used weekly to check for Perchloroethylene leaks, I observed his detector was in working condition.*
- *The facility water evaporator for filtering his water. Aqua Gone was empty and sitting in the secondary containment in corner behind the dry to dry.*
- *The facility appears to be in compliance at this time.*

ADDITIONAL SITE INFORMATION

Facility Name:	Yates Cleaners, Inc.
ARMS #:	103 0376

Machine #1:			
Manufacturer	REAL STAR	Capacity	lbs
Model#	RS 473	Serial#	Mfg yr
Machine #2:			
Manufacturer		Capacity	lbs
Model#		Serial#	Mfg yr

Notification (unpermitted sources only):

- 1. Was the facility assisted in filling out the notification by the inspector? Y N
- 2. Did the facility insist on filling out its own notification, and will send it to FDEP? Y N

Record keeping :

- 1. Does facility have statement/specs as to the design accuracy of the temperature sensor? Y N
 (Temperature of 45⁰F w/accuracy +/- 2⁰F, or 7.2EC w/accuracy of +/- 1.1⁰C)

Hazardous Waste:

- 1. Is all perc. contaminated wastewater either treated or disposed of properly? Y N
- 2. If wastewater is evaporated, is it an approved system, and using carbon filtration? Y N
- 3. Does the facility have secondary containment for the dry-dry machine? Y N
- 4. Does the facility have secondary containment for any perc. waste containers? Y N

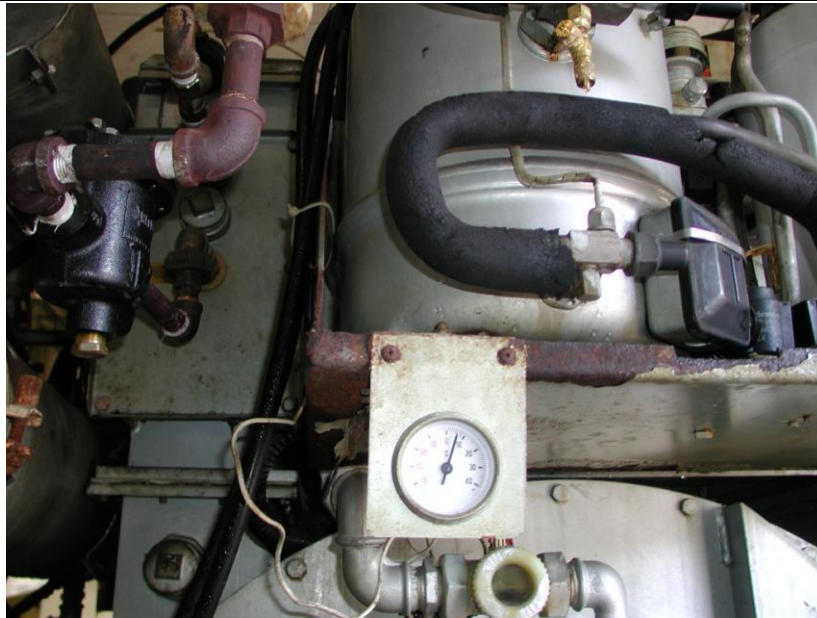
Boiler:

Manufacturer	<i>Lattner Boiler</i>	Hp	25
Model #	<i>N B53-751</i>	Serial #	Mfg yr 2007

Fuel Type: Natural gas? Propane? Fuel oil?

Comments: *The boiler is located in separate room, to the rear and west side of the facility building.*

Yates Cleaners, Inc.
710 Missouri Avenue South, Clearwater



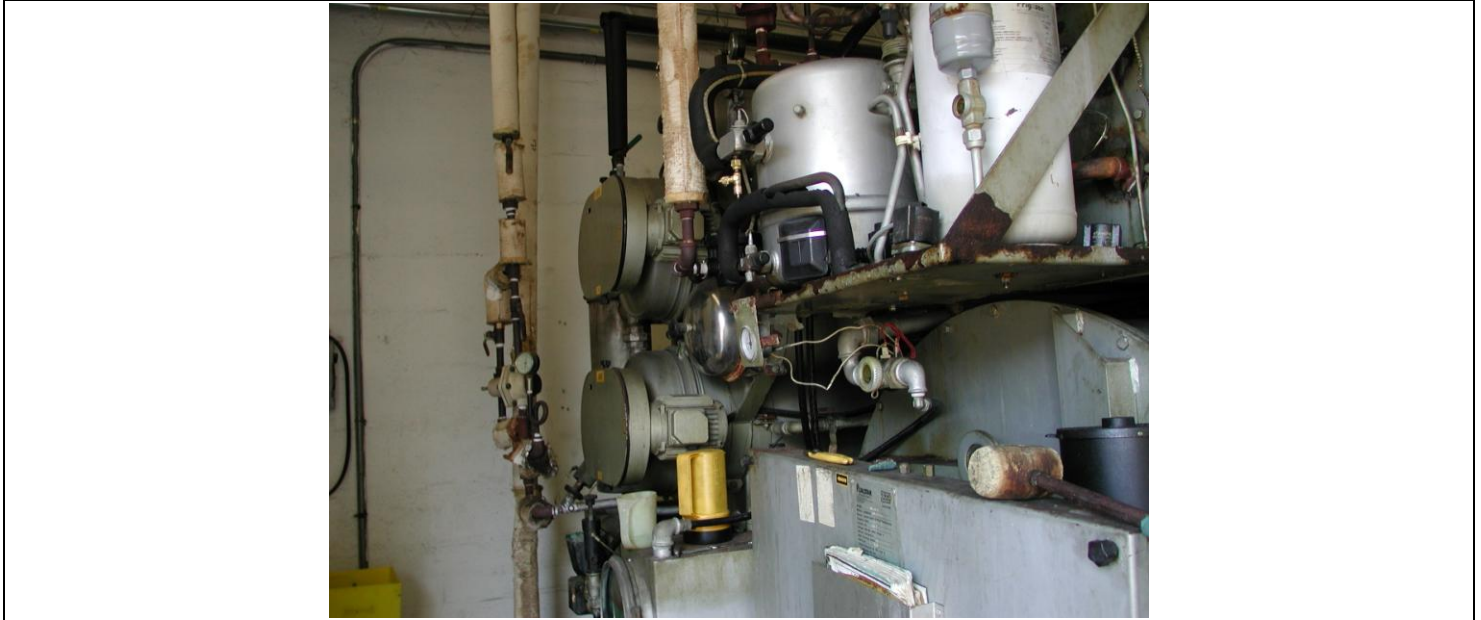
Project Id: 75740 **Permit No:** 1030376-003-AG **Arms Number:** 0376

Inspector: Shea Jackson **Inspection Date :** 1/31/2011

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine, 473 Real Star (1/95) with a refrigerated condenser. . A 25 HP No. 2 propane fired boiler is on-site.

Description: [The rear of the dry to dry was clean, the temperature was not registering at this time the machine was not in operation]

Yates Cleaners, Inc.
710 Missouri Avenue South, Clearwater



Project Id: 75740 **Permit No:** 1030376-003-AG **Arms Number:** 0376

Inspector: Shea Jackson **Inspection Date :** 1/31/2011

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine, 473 Real Star (1/95) with a refrigerated condenser. A 25 HP No. 2 propane fired boiler is on-site.

Description: **[The rear of the dry to dry, no odors were detected in this area]**

Yates Cleaners, Inc.
710 Missouri Avenue South, Clearwater



Project Id: 75740

Permit No: 1030376-003-AG

Arms Number: 0376

Inspector: Shea Jackson

Inspection Date : 1/31/2011

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine, 473 Real Star (1/95) with a refrigerated condenser. . A 25 HP No. 2 propane fired boiler is on-site.

Description: **[The Perchloroethylene still cleanout container was empty and cleaned out]**

Yates Cleaners, Inc.
710 Missouri Avenue South, Clearwater



Project Id: 75740 **Permit No:** 1030376-003-AG **Arms Number:** 0376

Inspector: Shea Jackson **Inspection Date :** 1/31/2011

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine, 473 Real Star (1/95) with a refrigerated condenser. . A 25 HP No. 2 propane fired boiler is on-site.

Description: **[The Hazardous waste containers in secondary containment covered. The floor had been painted with a spill resistant coating]**

Yates Cleaners, Inc.
710 Missouri Avenue South, Clearwater



Project Id: 75740 **Permit No:** 1030376-003-AG **Arms Number:** 0376

Inspector: Shea Jackson **Inspection Date :** 1/31/2011

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine, 473 Real Star (1/95) with a refrigerated condenser. A 25 HP No. 2 propane fired boiler is on-site.

Description: [The boiler is in a room on the west side of the building.]