



# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0730096 **DATE:** 4/21/2008 **ARRIVE:** 1:15 **DEPART:** 2:45

**FACILITY NAME:** PRESTIGE CLEANERS

**FACILITY LOCATION:** 3044 W Tharpe Street  
TALLAHASSEE 32303-1186

**OWNER/AUTHORIZED REPRESENTATIVE:** TOM RICHARDSON **PHONE:** (850)576-2918

**CONTACT NAME:** **PHONE:**

**ENTITLEMENT PERIOD:** 2/17/2003 / 2/17/2008 Facility may be operating without Entitlement!  
 (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><b>A. 1. 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><b>2. New 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 on or after 12/9/91)</p>
<p><b>3. 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><b>4. 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 \_\_\_\_\_ 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 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 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
c) Filter gaskets and seating -----	<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 checked="" type="checkbox"/> N/A
d) Pumps -----	<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
e) Solvent tanks and containers--	<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
f) Water separators -----	<input 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 type="checkbox"/>
b) Physical detection (airflow felt through gaskets) -----	b) <input type="checkbox"/>
c) Odor (noticeable perc odor) -----	c) <input type="checkbox"/>
d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) -----	d) <input type="checkbox"/> ** (see below)
e) Halogen leak detector -----	e) <input type="checkbox"/>

**\*\*If using direct-reading instrumentation, is the equipment:** ----- \*\*  N/A

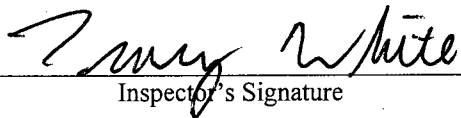
1) Capable of detecting perc vapor concentrations in a range of 0-500 ppm? -----	1) <input type="checkbox"/> Yes <input type="checkbox"/> No
2) Calibrated against a standard gas prior to and after each use (PID/FID only)? -----	2) <input type="checkbox"/> Yes <input type="checkbox"/> No
3) Inspected 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

4/21/2008

Inspector's Name (Please Print)

Date of Inspection



6-12 months

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:**

I arrived and met with Gonell Hines, Machine Operator. At first I asked for leak, temperature and PCE rolling total records. Mr. Hines provided a "regular" 2008 calendar that appeared to only have a weekly temperature check recorded on it.

Mr. Hines repeatedly explained that he "had not received a [2008] calendar" from the Department or his supervisor. I had, for my inspection purposes, a copy of a calendar I had printed from the online web site. I gave this copy to Mr. Hines. I explained to Mr. Hines that the Small Business Assistance Program no longer mailed out hardcopies of the calendars. I showed Mr. Hines a copy of a sample letter that the NW District office had mailed out to all drycleaners. It explained how to obtain a calendar online.

Mr. Hines repeatedly explained that his supervisor may have had this information, but Mr. Hines did not know of its existence.

I asked for the PCE rolling totals for the year, and it appeared that Mr. Hines could not produce a current PCE rolling total. I obtained a 2007 copy of his drycleaning calendar. The leak check and temperature check were recorded, but the PCE total from July 2007 to December 2007 was not completed. Mr. Hines explained that he had "transferred" these records to another location, but he could not find the records at the moment. Mr. Hines appeared to have copies of the PCE receipts.

I had a copy of a current GPCI inspection checklist (this form). I asked Mr. Hines about the Entitlement Period on the form, from 2/17/2003 to 2/17/2008 and noted that the "facility may be operating without entitlement." He could not provide any information on the expiration of the entitlement, other than I needed to speak with his supervisor.

I explained to Mr. Hines that it appears new regulatory leak check procedures will require the use of a "halogenated hydrocarbon detector or PCE gas analyzer." It appeared that Mr. Hines did not yet have one of these pieces of equipment. I also asked Mr. Hines about the operation of the "diverter valves" (for when the door is open) for the two machines still in use. Mr. Hines did not appear to be familiar with that particular piece of the equipment on the machines. It is not known if the valves exist or if they are properly maintained on the machines.

Mr. Hines had to run an errand, so I inspected the machines. I did not note any large number of waste containers, nor any containers containing wastewater. I did not observe the wastewater disposal method, but did not note any problems.

There were a total of three machines: the Metro machine, the Union machine and the Multimatic Shopstar machine. Mr. Hines had repeatedly explained that the Blue Multimatic machine was broken and not in use, and hasn't been in use for quite some time.

Mr. Hines had earlier mentioned that a new compressor had been installed on the Metro machine. He had also explained that he read temperature from the front of the machines. I did not note any excessive odors on the machines. However the machines were not in operation during my visit, so I did not witness their operation.

Note: Parts of this inspection checklist could not be properly completed because of insufficient information, which includes the following: The facility classification could not be determined at this time (no PCE total). Leak check information (2008) was not available.

Permit review: Entitlement apparently ended on 2/17/2008. I did not locate any records in the Department permit database indicating that a new application was received.

#### Recommendations:

The facility appears to be in a non-compliance status for the following:

- 1) July 2007 - March 2008 PCE rolling totals not available. (Rule 62-213.300 FAC)
- 2) January 2008- April 21, 2008 leak check records not available. (Rule 62-213.300 FAC)
- 3) The permit entitlement period appears to be expired.

#### Other recommendations:

- 1) The facility is advised to obtain and use the proper leak check equipment (if applicable). This may include a "halogenated hydrocarbon detector or PCE gas analyzer."
- 2) The facility is advised to properly maintain the diverter valve for the machines in use (if applicable).
- 3) Please complete and update the PCE rolling total, and submit a copy of your updated total.