



PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730096 **DATE:** 9/16/2009 **ARRIVE:** 11:15 **DEPART:** _____

FACILITY NAME: PRESTIGE CLEANERS

FACILITY LOCATION: 3044 W THARPE ST
TALLAHASSEE 32303-1186

OWNER/AUTHORIZED REPRESENTATIVE: TOM RICHARDSON **PHONE:** (850)576-7737

CONTACT NAME: Gonell Hines **PHONE:** _____

ENTITLEMENT PERIOD: 2/5/2009 / 2/5/2014
(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)

<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 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>

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 ----- Yes No N/A
- b) Door gaskets and seating ----- Yes No N/A
- c) Filter gaskets and seating ----- Yes No N/A
- d) Pumps ----- Yes No N/A
- e) Solvent tanks and containers -- Yes No N/A
- f) Water separators ----- Yes No N/A
- g) Muck cookers ----- Yes No N/A
- h) Stills ----- Yes No N/A
- i) Exhaust dampers ----- Yes No N/A
- j) Diverter valves ----- Yes No N/A
- k) Cartridge filter housings 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

9/16/2009

Inspector's Name (Please Print)

Date of Inspection

6-12 months

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

I met with Gonell Hines, Machine Operator. Tom Richardson, Owner, was not on-site during the inspection. Three machines were present. Two machines, the Metro and Union machine, were in operation, apparently in the drying cycle. The pump leak that was observed from the last inspection on 11/12/2008 appeared to have been repaired.

I observed the temperature gauges and pressure gauges for both machines. The temperature gauge needle for the Metro machine appeared to be bent and was not functioning. The pressure gauges for the Metro machine appeared to be functional.

I asked Mr. Hines if he had the operation manuals for the machine and if he knew the correct operational pressures for the cool-down cycle. He explained that he had the manuals, but they were not available (not on-site).

The Union machine had temperature and pressure gauges installed. I do not know if the gauges were working correctly for this machine (was not in cool down cycle during inspection).

The third "blue" machine was not in operation and, according to Mr. Hines "had not been operated for years."

Waste containers were in the containment area and had lids. Later I asked Mr. Hines about the water waste disposal. He showed hazardous waste manifests of the waste pickup company and explained that all waste is taken off-site by the waste company.

The Union machine had a steam line leak, however this line was for heating the still and was not Perc-related. I did observe a somewhat strong Perc odor behind the Union machine, but I did not note any major leaks.

Mr. Hines did not have a PCE leak detector device. He explained he would mention it to the owner.

I requested the records. Mr. Hines immediately explained that he "was never sent a [2009] calendar." I gave him my reference copy of the 2009 SBAP calendar. I informed him that the calendar was available online. Mr. Hines did not appear to keep any records since the last inspection (none were supplied). However he did supply most of the 2009 Calendar year Perc receipts.

NOTE: Notification of Compliance status (EPA and FLDEP-due 7/28/2008) was received on 1/05/2009. Also, according to the Department records, the facility now has an entitlement to operate (issued on 2/05/2009).

Recommendations:

Based the 9/16/2009 inspection observations, the facility appears to be non compliant for the following issues:

- 1) Failure to maintain leak check records since the last inspection, repeat violation.
- 2) Failure to maintain repair reports for the machines.
- 3) Failure to maintain Perc rolling total records since the last inspection, repeat violation.
- 4) Failure to obtain and use a PCE leak detector device.
- 5) Failure to maintain equipment operation manuals on-site.
- 6) Failure to maintain temperature check/pressure system check records (as applicable).

All other issues related to past non-compliance status are under District review. This report will be forwarded to the District office.

NOTE: Parts of this inspection checklist could not be completed due to insufficient information.