

## PERCHLOROETHYLENE DRY CLEANERS



### COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)						
RE-INSPECTION (FUI) ARMS COMPLAINT NO:						
AIRS ID#:	Date: November 3, 2011	Time In: 10:30AM Time Out: 11:00	$\mathbf{AM}$			
103 0397						
Facility Name:	Bay Area Business Cleaners,	Inc.				
<b>Facility Location:</b>	945 Huntley Avenue					
	Dunedin, FL, 34698					
<b>Responsible Official:</b> Kenneth Schumann <b>Phone No:</b> 727-733-0959						
Emis. Unit Description:	<b>Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine</b> (12/8/1991) with a 10 HP No. 4 fuel oil fired boiler					
Permit Number:	1030397-004-AG	<b>Exp. Date:</b> 9/12/2012				
<b>Facility Contact:</b>	Kenneth Schumann	<b>Phone:</b> 727-733-0959				
<b>Compliance Status:</b>	⊠ IN	SNC				
PART I: NOTIFICATIO	N (Check appropriate box)					
1. <b>Existing</b> facility notified	d DARM by 9/1/96		$\boxtimes$			
2. <b>New</b> facility notified DA	ARM 30 days prior to startup					
3. Facility <b>failed to notify</b>	DARM to use general permit					
PART II: CLASSIFICAT	TION					
Facility indicated on notif						
☐ No Notification Form	Drop-Off Store	Out of business Petroleum Solven	Only			
A.		0 N N				
1. Existing small area	<u>-</u>	2. New small area source				
Dry-to-dry only, $x < 140$	•	Dry-to-dry only, $x < 140$ gal/yr				
Transfer only, $x < 200 \text{ g}$	•	Transfer only, x <200 gal/yr	Ш			
Both types, x <140 gal/	~	Both types, x <140 gal/yr				
(Constructed <b>before 12</b>		(Constructed on or <b>after 12/9/91</b> )  4. <b>New large</b> area source				
3. Existing large area s  Dry-to-dry only, 140>		Dry-to-dry only, 140> x <2,100 gal/yr				
Transfer only, 200> x <	, E .	Transfer only, 200> x <1,800 gal/yr				
Both types, $140 > x < 1$ ,		Both types, 140> x <1,800 gal/yr	Ш			
(Constructed <b>before 12</b>	<b>.</b>					
(Constructed before 12	·/Q/Q1)	(Constructed on or after 17/9/91)				
	<i>(</i> /9/91)	(Constructed on or <b>after 12/9/91</b> )				
This is a correct facility c	,	N   Can not determine				
•	,	N ☐ Can not determine				
If no, please check	lassification $\boxtimes$ Y $\square$	N ☐ Can not determine on:				
<b>If no, please check</b> ☐ Facility qualifie	lassification $\boxtimes$ Y $\square$	N ☐ Can not determine  on: ber above.				
If no, please check  Facility qualified  Facility exceed  B. Highest 12-month cons	lassification	N ☐ Can not determine  on: ber above.				

#### 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? $\boxtimes Y$ $\prod N$ $\square$ NA 2. Examining the containers for leakage? $\bowtie Y$ $\prod N$ $\prod NA$ 3. Closing and securing machine doors except during loading/unloading? $\bowtie Y$ $\prod N$ 4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? $\boxtimes Y$ $\square$ N $\sqcap$ NA 5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? $\prod Y$ $\prod N$ $\boxtimes$ 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) $\prod Y$ $\prod N$ $\bowtie$ NA 1. Equipped all machines with the appropriate vent controls? $\square Y$ $\square$ N $\bowtie$ NA 2. Equipped dry-to-dry machines with a closed-loop vapor venting system? 3. Equipped the condenser with a diverter valve so airflow will be directed away from the $\prod Y$ $\prod N$ $\bowtie$ NA condenser upon opening the door? 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated $\prod Y$ $\prod N$ $\bowtie$ NA condenser on a weekly basis? 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the $\prod Y$ $\prod N$ $\bowtie$ NA condenser exceeded 45° F? 6. Conducted all temperature monitoring after an appropriate cool down period and after $\square Y$ $\square$ N $\bowtie$ NA verifying the coolant had been completely charged? 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? $\square Y \boxtimes N \boxtimes NA$ 2. Measured and recorded the washer exhaust temre at the condenser inlet and outlet $\Box$ Y $\Box$ N $\Box$ NA weekly? °F? Is the temperature differential equal to or $\square Y \square N \square NA$ 3. Measured and recorded the concentration eekly at the end of the oper, machines are equipped final drying cycle while the e is venting with a carbon ad $\square Y$ $\square$ N $\square$ NA Is the per ppm? or less the $\square Y \quad \square N \quad \square NA$

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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 dust 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
PA	RT V: RECORDKEEPING REQUIREMENTS	
	s the responsible official: neck 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;  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 □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?  Problem corrected?	□Y □N ⊠NA □Y □N ⊠NA
8.	Maintained compliance plan, if applicable?	□Y □N ⊠NA

PAI	TT VI: LEAK DETECTION AND REPAIRS		
1.	Does the responsible official conduct weekly leak detection and repair inspection?	$\boxtimes Y$	□N

1.	Does the responsible official conduct weekly le	ak det	ection	and repair inspection?	$\boxtimes Y$	□N
2.	. Which method of detection does the responsible official use?				$\boxtimes Y$	$\square N$
	Visual examination (condensed solvent of exterior surfaces)				$\boxtimes Y$	$\square N$
	Physical detection (airflow felt through ga	iskets)			$\boxtimes Y$	$\square N$
	Odor (noticeable perc odor)				$\boxtimes Y$	$\square N$
	Use of direct-reading instrumentation (FII	D/PID/	calori	metric tubes)	$\square Y$	$\boxtimes N$
	If using direct-reading instrumentation, is the	equip	ment:		$\square Y$	$\square N$
	a. Capable of detecting perc vapor concen	tration	s in a	range of 0-500 ppm	$\square Y$	$\square N$
	b. Calibrated against a standard gas prior to	to and	after e	each use (PID/FID only).	$\square Y$	$\square N$
	c. Inspected for leaks and obvious signs of	f wear	on a v	veekly basis?	$\square Y$	$\square N$
	d. Kept in a clean and secure area when no	ot in us	se.		$\square Y$	$\square N$
	e. Verified for accuracy by use of duplicat	te samp	oles (c	alorimetric only)?	$\square Y$	$\square N$
<b>3.</b>	Has the facility maintained a leak log?				$\boxtimes Y$	$\square N$
4.	The following area should be checked for leaks	s by th	e ope	rator:	$\boxtimes Y$	$\square N$
	Hose connections, fitting couplings, and valves	$\boxtimes Y$	$\square N$	Muck cookers	$\square Y$	$\boxtimes N$
	Door gaskets and seating	$\boxtimes Y$	$\square N$	Stills	$\boxtimes Y$	$\square N$
	Filter gaskets and seating	$\boxtimes Y$	$\square N$	Exhaust dampers	$\boxtimes Y$	$\square N$
	Pumps	$\boxtimes Y$	$\square N$	Diverter valves	$\square Y$	$\boxtimes N$
	Solvent tanks and containers	$\boxtimes Y$	$\square N$	Cartridge Filter housing	$\boxtimes Y$	$\square N$
	Water separators	$\boxtimes Y$	$\square N$			
	Shea Jackson			November 3, 2011		
	Inspector's Name (Please Print)			Date of Inspection		
				Within one year of this inspe	ection	
	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.) $\boxtimes Y$ $\square N$
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 $\S63.322(k)$ or (I). $\square Y$ $\square NA$
(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? $\boxtimes Y  \Box N  \Box NA$
To the variety leak increasion conducted by placing the probe inlet at the curface of each component interface
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? $\square Y \square NA$
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? $\Box Y \Box N \Box NA$
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? $\boxtimes Y  \square N$

### ADDITIONAL SITE INFORMATION

**Facility Name:** Bay Area Business Cleaners, Inc.

**ARMS** #: 103 0397

### **Inspection Comments:**

• I met with the responsible official Mr. Kenneth Schumann.

- I reviewed the 2010 and 2011 calendar Bi weekly leak check records. The leak checks were up to date. The temperature requirement is not applicable to small existing dry to dry machines.
- The calendar record and the monthly 12 month consecutive Perc totals were up to date. The highest 12 month total was for at 45 gallons, for February 2011, and the current total was 40.7 gallons
- Mr. Schumann maintains the purchase receipts for the perchloroethylene and Hazardous waste manifest copies within the calendar record. The purchases invoice for 9/2/2011 was for the amount of 15 gallons of perchloroethylene.
- The most recent invoice was 6/9/2011 for the disposal of perc waste and filter cartridges. Mr. Schumann's procedure for filter change out is to leave the Perchloroethylene cartridges in over the weekend. This meets more than the 24 hour requirement
- The temperature recording is not required for existing small machines classification.
- I observed the HP 25 dry to dry machine; had completed drying cycle.
- I did not detect perchloroethylene odors during this inspection and observation of the dry to dry machine. Mr. Schumann used the Halogen detector for leak checks during inspection and no alarms sounded.
- The separator water is then transferred to the Galaxy Mister for evaporation of reclaim water.
- The shutdown procedures and the emergency plan and contacts are posted on the dryer
- The hazardous material drums and water evaporator were located in the secondary containment to prevent perchloroethylene leakage.
- I gave him the P2R2 pamphlet and brochure with the dry cleaner summary handout.
- The facility was operating in compliance of the general permit conditions.

### ADDITIONAL SITE INFORMATION

<b>Facility Name:</b>	Bay Area Busine	ess Cleaners, Inc.					
ARMS #:	103 0397						
Machine #1:							
Manufacturer	HP 25	C	apacity		lbs		
Model#		S	erial#		Mfg yr		
Machine #2:							
Manufacturer		C	apacity		lbs		
Model#	<u> </u>						
Natification (							
,	permitted sources o	•	y tha inanaatan	.0	$\Box \mathbf{V}$	MN	
	ty assisted in filling of	·	-		□Y	⊠N	
	y insist on filling out	its own notification,	and will send	II IO FDEP!	$\square Y$	$\boxtimes N$	
Record keeping		as to the design accou	maay of the ton	mmanatuna samsan?	$\Box \mathbf{V}$	NI/A	
•	ave statement/specs	-	•	•	$\square Y$	⊠N/A	
` •	nture of 45 <sup>0</sup> F w/accur	$acy + /- 2^{\circ}F$ , or $/.2E$	C w/accuracy	or +/- 1.1°C)			
Hazardous Was			1-C	10		□Nt	
•	taminated wastewate			•	$\boxtimes Y$ $\boxtimes Y$	□N	
<ul><li>2. If wastewater is evaporated, is it an approved system, and using carbon filtration?</li><li>3. Does the facility have secondary containment for the dry-dry machine?</li></ul>						□N	
	•		•		⊠Y	□N	
Boiler:	ty have secondary co	mamment for any pe	erc. waste com	amers?	$\boxtimes Y$	□N	
	TImad				I I.a	25	
	Hurst	G : 1	П		Hp	25	
Model #		Serial	#		Model		
Fuel Type:	Natural gas?	Fuel	Natural		Fuel	Natural	
ruer Type.	ivaturar gas:	Type:	gas?		Type:	gas?	
		1,700.	gus.		Type.	gus.	
	The boiler is exempt f	from permitting, and	located in a se	econd storage build	ling on the	east side	
$\epsilon$	of the facility.						

# Bay Area Business Cleaners, Inc. Tabor Cleaners

945 Huntley Avenue, Dunedin



**Project Id:** <u>80689</u> **Permit No:** 1030397-004-AG **Arms Number:** <u>0397</u>

**Inspector:** Shea Jackson **Inspection Date / Time:** 11/3/2011

Source (EU): Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine

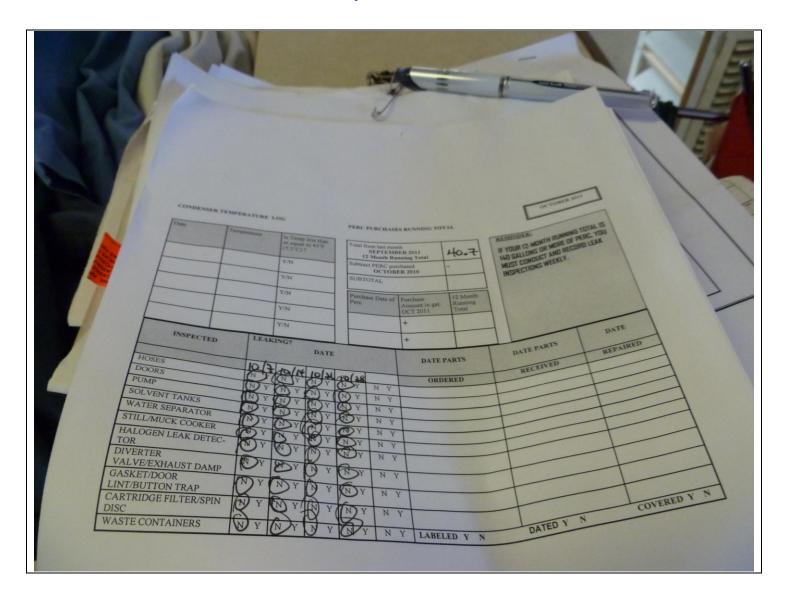
(12/8/1991) with a 10 HP No. 4 fuel oil fired boiler

**Description:** [The facility dry to dry is an older machine, and does not have temperature

requirement]

# Bay Area Business Cleaners, Inc. Tabor Cleaners

945 Huntley Avenue, Dunedin



**Project Id:** <u>80689</u> **Permit No:** 1030397-004-AG **Arms Number:** <u>0397</u>

**Inspector:** Shea Jackson **Inspection Date / Time:** 11/3/2011

Source (EU): Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine

(12/8/1991) with a 10 HP No. 4 fuel oil fired boiler

Description: [The leak check records and Perc 12 month total were up to date ]

# Bay Area Business Cleaners, Inc. Tabor Cleaners

945 Huntley Avenue, Dunedin



**Project Id:** <u>80689</u> **Permit No:** 1030397-004-AG **Arms Number:** <u>0397</u>

**Inspector:** Shea Jackson **Inspection Date / Time:** 11/3/2011 /

Source (EU): Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine

(12/8/1991) with a 10 HP No. 4 fuel oil fired boiler

**Description:** [The Purchase orders are maintained with the monthly records for the Perc 12

month totals]