



# Florida Department of Environmental Protection

Northwest District Branch Office  
3900 Commonwealth Boulevard, MS 55  
Tallahassee, Florida 32399-3000

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard, Jr.  
Secretary

January 21, 2011

Walter Smallwood  
Mirror Cleaners  
471 John Knox Road  
Tallahassee, Florida 32303-4109

Dear Mr. Smallwood:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is **0730098**. The permit **expires on June 5, 2014**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the inspection results, the Tallahassee Branch Office reported a facility status of **In Compliance**. Your facility compliance status may be subject to further review by the District Program Office.

In order to complete the yearly inspection process, the enclosed "Annual Compliance Certification Form" will also have to be submitted. Please fill out your relevant sections of the form, including the Annual Reporting Period. Please check your compliance status box, sign and date the bottom of the form, and return or mail the form back to this office. You may keep the yellow copy for your records.

The assistance you provided is appreciated. The inspection checklist and its comments section are enclosed. If you have any questions, your local contact is Tracy White at 850/ 245-2960 or [tracy.a.white@dep.state.fl.us](mailto:tracy.a.white@dep.state.fl.us).

Sincerely,

Marlane Castellanos  
Branch Manager

MC/tw

Enclosures

cc: Rick Bradburn, Carol Melton, Mary Beth Curle, Pensacola FDEP



# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0730098 **DATE:** 1/12/2011 **ARRIVE:** 2:15 **DEPART:** \_\_\_\_\_  
**FACILITY NAME:** MIRROR CLEANERS  
**FACILITY LOCATION:** 471 JOHN KNOX RD  
 TALLAHASSEE 32303-4109  
**OWNER/AUTHORIZED REPRESENTATIVE:** WALTER SMALLWOOD **PHONE:** (850)422-2811  
**Email:** \_\_\_\_\_ **Mobile:** \_\_\_\_\_  
**CONTACT NAME:** \_\_\_\_\_ **PHONE:** \_\_\_\_\_  
**Email:** \_\_\_\_\_ **Mobile:** \_\_\_\_\_  
**ENTITLEMENT PERIOD:** 6/5/2009 / 6/5/2014  
 (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><b>A. 1. Existing small area source</b> <input type="checkbox"/><br/>         dry-to-dry only, <math>x &lt; 140</math> gal/yr<br/>         transfer only, <math>x &lt; 200</math> gal/yr<br/>         both types, <math>x &lt; 140</math> gal/yr<br/>         (constructed before 12/9/91)</p> <p><b>3. Existing large area source</b> <input type="checkbox"/><br/>         dry-to-dry only, <math>140 \leq x \leq 2,100</math> gal/yr<br/>         transfer only, <math>200 \leq x \leq 1,800</math> gal/yr<br/>         both types, <math>140 \leq x \leq 1,800</math> gal/yr<br/>         (constructed before 12/9/91)</p> <p><b>5. Ineligible for General Permit</b> <input type="checkbox"/><br/>         d rop store/out of business/petroleum /<br/>         facility exceeds above limits</p> | <p><b>2. New small area source</b> <input type="checkbox"/><br/>         dry-to-dry only, <math>x &lt; 140</math> gal/yr<br/>         transfer only, <math>x &lt; 200</math> gal/yr<br/>         both types, <math>x &lt; 140</math> gal/yr<br/>         (constructed on or after 12/9/91)</p> <p><b>4. New large area source</b> <input checked="" type="checkbox"/><br/>         dry-to-dry only, <math>140 \leq x \leq 2,100</math> gal/yr<br/>         transfer only, <math>200 \leq x \leq 1,800</math> gal/yr<br/>         both types, <math>140 \leq x \leq 1,800</math> gal/yr<br/>         (constructed on or after 12/9/91)</p> |
|---|---|
- B. The sum of the volume of all perchloroethylene (perc) purchases made in each of the previous 12 months by this dry cleaning facility was 150.00 gallons.**

**PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC**

(check  only one box for each question)

1. Is all perc, and wastes containing perc, in tightly sealed & impervious containers? -----  Yes  No  N/A
2. Are all perc. containers leak free? -----  Yes  No  N/A
3. Are all machine doors kept closed and secured except during loading/unloading? -----  Yes  No
4. Are cartridge filters drained in their housing or in sealed containers for at least 24 hours prior to disposal? -----  Yes  No  N/A
5. Has each dry cleaning system installed after December 21, 2005 at an area source, routed the air-PCE gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser and passed the air-PCE gas-vapor stream from inside the dry cleaning machine drum through a non-vented carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine is opened? The carbon adsorber must be desorbed in accordance with manufacturer's instructions. -----  Yes  No  N/A
6. Is solvent-to-carbon ratios and steam pressure for carbon adsorber beds maintain 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 an 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 an 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  N/A
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. For all existing large or new large area sources:**

1. Is the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines measured and recorded on a weekly basis? -----  Yes  No
2. Is the washer exhaust temperature at the condenser inlet and outlet measured and recorded weekly? -----  Yes  No  N/A
  - a) Is the temperature differential equal to, or greater than 20° F? -----  Yes  No  N/A
3. Is the perc concentration in the exhaust stream inlet and outlet measured 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. Is the sampling port on the carbon adsorber exhaust for measuring perc concentrations 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. Are transfer machines equipped (dryers, reclaimers, and washers) with individual condenser coils? -----  Yes  No  N/A
6. Is airflow routed to the carbon adsorber (if used) at all times? -----  Yes  No  N/A

**PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC**

(check  only one box for each question)

1. Are receipts maintained for all perc purchased? -----  Yes  No
2. Are rolling monthly totals of yearly perc consumption maintained? -----  Yes  No
3. Are leak detection inspection and repair reports maintained for the following:
  - a) Of any leaks repaired w/in 24 hrs? or; -----  Yes  No  N/A
  - b) Of any 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. Is calibration data maintained for applicable direct reading instruments? -----  Yes  No  N/A
5. Is exhaust duct monitoring data on perc concentrations maintained? -----  Yes  No  N/A
6. Is a startup/shutdown/malfunction plan maintained for each machine? -----  Yes  No
7. Are deviation reports maintained? -----  Yes  No  N/A
  - a) Problem corrected? -----  Yes  No  N/A
8. Is a compliance plan maintained, 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. What type of leak detection equipment is used to detect leaks?  
 Halogenated hydrocarbon detector  PCE gas analyzer  None used
2. Is the halogenated hydrocarbon detector or PCE gas analyzer operated according to the manufacturer's instructions (*manual was available and RO could demonstrate procedure*) ? -----  Yes  No
3. For major sources is the halogenated hydrocarbon detector or PCE gas analyzer operated according to EPA Method 21 ?- -----  Yes  No  N/A
4. 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? -----  Yes  No
5. 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 (*based on documented specifications*) ? -----  Yes  No  N/A
6. Is the halogenated hydrocarbon detector capable of detecting vapor concentrations of PCE of 25 parts per million by volume (*based on documented specifications*) 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? -----  Yes  No  N/A
7. 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)*

a) Hose connections, fittings, couplings, and valves ----- <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A b) Door gaskets and seating ----- <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 d) Pumps ----- <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 f) Water separators ----- <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 h) Stills ----- <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 j) Diverter valves ----- <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
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8. 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)*)
 

a) Hose connections, fittings, couplings, and valves ----- <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A b) Door gaskets and seating ----- <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 d) Pumps ----- <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 f) Water separators ----- <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 h) Stills ----- <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 j) Diverter valves ----- <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
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**PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC (continued)**

9. What evidence suggests that leak checks are performed as required?

Leak log documentation    RO Assurances    On-site observation    other

Explain other :

Tracy White

1/12/2011

\_\_\_\_\_  
Inspector's Name (Please Print)

\_\_\_\_\_  
Date of Inspection

\_\_\_\_\_  
Inspector's Signature

\_\_\_\_\_  
Approximate Date of Next Inspection

**COMMENTS:** I met with Walter (Tony) Smallwood. Mr. Smallwood indicated that, due to economic reasons, the facility would no longer be drycleaning clothes at this location.

The location in Quincy, Florida (facility # 0390037) would take over all drycleaning operation. The store in Tallahassee would remain open only as a drop-off station.

Mr. Smallwood was undecided on if the drycleaning machine would be removed from the facility. The machine also still contained Perc in the reservoir tank. The machine was not in operation during the site inspection. Mr. Smallwood had calendar records for 2010, up until the last month of operation (December 2010).

Additional comments and recommendations:

Due to economic conditions, the facility appears to be in long-term reserve shut down status. Future activity status is unknown. The Responsible Official (RO) should to contact the Department if the facility equipment resumes operation. Should the entitlement (permit) approach expiration and the facility would like to continue to maintain the permit, the RO should follow proper permit renewal procedures as outlined in the notification form (permit). If the RO would like to surrender the permit, please contact the Department for further instructions.

**DRY CLEANER AIR QUALITY GENERAL PERMIT  
ANNUAL COMPLIANCE CERTIFICATION FORM**

FACILITY NAME: \_\_\_\_\_ DATE: \_\_\_\_\_

FACILITY LOCATION: \_\_\_\_\_

Annual Reporting Period: \_\_\_\_\_ 20 \_\_\_\_\_ TO \_\_\_\_\_ 20 \_\_\_\_\_

Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement.  YES  NO

If NO, complete the following:

#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_

Action(s) taken to achieve compliance: \_\_\_\_\_

Method used to demonstrate compliance: \_\_\_\_\_

#2. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_

Action(s) taken to achieve compliance: \_\_\_\_\_

Method used to demonstrate compliance: \_\_\_\_\_

*As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, my annual consumption of perchloroethylene solvent, based upon purchase receipts, does not exceed 2,100 gallons per year for dry-to-dry facilities or 1,800 gallons per year for transfer or combination facilities.*

RESPONSIBLE OFFICIAL: \_\_\_\_\_  
Name (Please Print) Signature Date

\*This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.