PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

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

AIRS ID#: 103 0415	**Date:** 3/26/2009	**Time In:** 12:55AM	**Time Out:** 1:20PM
Facility Name:	Causeway Cleaners		
Facility Location:	2666 Bayshore Blvd.		
	Palm Harbor, FL, 34698		
Responsible Official:	Steve Milby	**Phone No:**	727-733-4206
Emis. Unit Description:	Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (1989). 15 HP propane fired boiler on-site.		
Permit Number:	1030415-003-AG	**Exp. Date:**	1/13/12
Facility Contact:	Steve Milby	**Phone:**	727-733-4206
Compliance Status:	☒ **IN** ☐ **MNC** ☐ **SNC**		

PART I: NOTIFICATION (Check appropriate box)

1. **Existing** facility notified DARM by 9/1/96 ☒
2. **New** facility notified DARM 30 days prior to startup ☐
3. 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.

1. **Existing small** area source
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**)

2. **New small** area source
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**)

3. **Existing large** area source
Dry-to-dry only, **140> x <2,100** gal/yr
Transfer only, 200> x <1,800 gal/yr ☐
Both types, 140> x <1,800 gal/yr
(Constructed **before 12/9/91**)

4. **New large** area source
Dry-to-dry only, **140> x <2,100** gal/yr
Transfer only, 200> x <1,800 gal/yr ☐
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 1 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: __113__

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?	☒ Y	☐ N	☐ NA
2. Examining the containers for leakage?	☒ Y	☐ N	☐ NA
3. Closing and securing machine doors except during loading/unloading?	☒ Y	☐ N	
4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal?	☒ Y	☐ N	☐ NA
5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications?	☐ Y	☐ N	☒ 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?	☐ Y	☐ N	☒ NA
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	☐ Y	☐ N	☒ NA
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door?	☐ Y	☐ N	☒ NA
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis?	☐ Y	☐ N	☒ NA
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45o F?	☒ Y	☐ N	☐ NA
6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged?	☐ Y	☐ N	☒ 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?	☐Y	☐N	☒ NA
2. Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly?	☐Y	☐N	☐NA
Is the temperature differential equal to or less than 20° F?	☐Y	☐N	☐NA
3. Measured and recorded the perc concentration weekly at the end of the final drying cycle while the machine is venting to the carbon adsorber, if machines are equipped with a carbon adsorber?	☐Y	☐N	☐NA
Is the perc concentration equal to or less than 100 ppm?	☐Y	☐N	☐NA
4. Assured that the sampling port on adsorber exhaust for measuring perc. concentrations is at least five duct diameters downstream of any bend, contraction, or expansion; is at least two diameters upstream from any bend contraction, or expansion; and downstream from the carbon adsorber 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 a Bi weekly leak detection and repair inspection?**	☒Y	☐N
2.	**Which method of detection does the responsible official use?**	☒Y	☐N
	Visual examination (condensed solvent of exterior surfaces)	☒	
	Physical detection (airflow felt through gaskets)	☒	
	Odor (noticeable perc odor)	☒	
	Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	☐	
	If using direct-reading instrumentation, is the equipment:	☐Y	☐N
	a. Capable of detecting perc vapor concentrations in a range of 0-500 ppm	☐Y	☐N
	b. Calibrated against a standard gas prior to and after each use (PID/FID only).	☐Y	☐N
	c. Inspected for leaks and obvious signs of wear on a weekly basis?	☐Y	☐N
	d. Kept in a clean and secure area when not in use.	☐Y	☐N
	e. Verified for accuracy by use of duplicate samples (calorimetric only)?	☐Y	☐N
3.	**Has the facility maintained a leak log?**	☐Y	☒N
4.	**The following area should be checked for leaks by the inspector:**	☐Y	☐N

Hose connections, fitting couplings, and valves	☒Y	☐N	Muck cookers	☐Y ☒N
Door gaskets and seating	☒Y	☐N	Stills	☒Y ☐N
Filter gaskets and seating	☒Y	☐N	Exhaust dampers	☒Y ☐N
Pumps	☒Y	☐N	Diverter valves	☐Y ☒N
Solvent tanks and containers	☒Y	☐N	Cartridge Filter housing	☒Y ☐N
Water separators	☒Y	☐N		

Shea Jackson	3/26/2009
Inspector=s Name (Please Print)	Date of Inspection
	After the repair of equipment is performed
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

Comments: *The Facility RO Mr. Milby stated he was continuing to performed leak checks, and is now maintaining the leak check records. The Facility RO used his halogen detector to demonstrate leak checking, the detector alarmed to show a leak was detected around the machine door.*

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

Comments:***:*** *The Facility RO - Mr. Milby has been performing leak checks with the TIFXL 1A detector he had on site, but when performed a leak check the detector the alarm sometimes detected a Perc Leak, around the closed door, and other times did not. I advised should have further repair made until alarm does not sound.*

(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

Comment: *The detector was operated according to manual instructions and another Perc leak was found during inspection, around the site glass coupling area in the rear of the dryer.*

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

Comment: *The detector was operated while placing probe at the surface of the dry to dry door, and a Perc leak was found during inspection.*

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

Comment: *The facility has a halogenated detector model that was listed on the FDEP approved list, as capable of detecting 25 ppm*

ADDITIONAL SITE INFORMATION

Facility Name:	Causeway Cleaners
ARMS #:	103 0415

- *I re-inspected the facility to check for the repairs to the dry to dry regarding Perc leaks found during the previous inspection. I met with the facility contact Mr. Steve Milby.*
- *Mr. Milby stated he had taken the records home to update Perc Totals .*
- *The source is exempt from the temperature reading requirements.*
- *I observed the dryer and equipment. The dryer was not in operation at the time of inspection.*
- *There were no Perc odors detected around the machine at this time.*
- *I asked Mr. Milby if he had contacted the maintenance company to check machine. He stated checks daily and he had tried to adjust the door gasket himself, and it continued to be occurring occasionally. Mr. Milby stated it did not seem to be dependent on whether the machine was in operation or not.*
- *Mr. Milby took the facilities Halogen detector around door, first time and it did not alarm, and the next time around it did. I also checked with my P.C. detector, but did not alarm in door area. I told him he would probably need for a maintenance company to check, as my detector appears not to be sensitive enough to detect leak at this time. (See photo)*
- *He was checking the dry to dry and took the detector around the equipment parts in the rear. There was an audible beep around the Perc site glass as the* ***alarm sounded detecting a Perc leak****. I used the P.C. detector in the site glass area and was not alarming in same area. I informed Mr. Milby that his detector is a newer model and an EPA approved device, and he should have the equipment repaired for leak based on the results of his device. (See photos) Mr. Milby stated he would repair tomorrow, by tighten connection and adding some pipe sealant tape.*
- *Based on Perc leaks detected, this source still does not appear to be in compliance at this time .*

ADDITIONAL SITE INFORMATION

Facility Name:	Causeway Cleaners
ARMS #:	103 0415

Machine #1:			
Manufacturer	CEF Rovin Machine Corp	Capacity	lbs
Model#	Prestige 160	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? (Temperature of 45EF w/accuracy ∀2EF, or 7.2EC w/accuracy of ∀1.1EC)	☒Y	☐N

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	Hurst			Hp	25
Model #		Serial #	V86-150-446	Mfg yr	2001

Fuel Type: Natural gas? ☒ Propane? ☐ Fuel oil? ☐

Comments: *The boiler is exempt.*

ENFORCEMENT SUMMARY

Facility Name:	Causeway Cleaners
ARMS #:	103 0415

Viol#	Violation Description	Frequency	From	To
per00	Failure to notify and obtain a permit			
per01	No purchase records	Monthly		
per02	No perc. purchase rolling totals	Monthly		
per03	No leak log	☐ Weekly ☐ Bi-weekly		
per04	No temp. log	Weekly		
per05	No SSM plan			
per06	Temp. sensor accuracy verification			
per07	No leak checks	☐ Weekly ☐ Bi-weekly		
per08	No temp. checks	Weekly		
per09	Perceptible leaks			
per10	No carbon absorber			
per11	No carbon absorber test	Weekly		
per12	No leak tight containers			
per13	No separator pre-filter			
per14	Leaks not repaired within 24hrs.			
per15	Repair refrig. cond./carbon abs. within 2 days			

Viol#	Comments
per02	*The facility 12 month consecutive Perc totals were shown to be updated during the 4/1/2009 enforcement meeting.*
per03	*The facility Bi-weekly leak log had been updated to March 2009. Mr. Milby showed his calendars during the 4/1/2009 enforcement meeting.*
per07	*Mr. Milby stated he had been performing the leak checks.*
Per14	*During the inspection the RO leak checked with the halogen detector. The door was leaking off and on, and an additional leak was found in the rear near Perc site glass using the detector during this inspection.* .

Causeway Cleaners

2666 Bayshore Blvd., Palm Harbor

Project Id: 69085 **Permit No:** 1030415-003-AG **Arms Number:** 0415

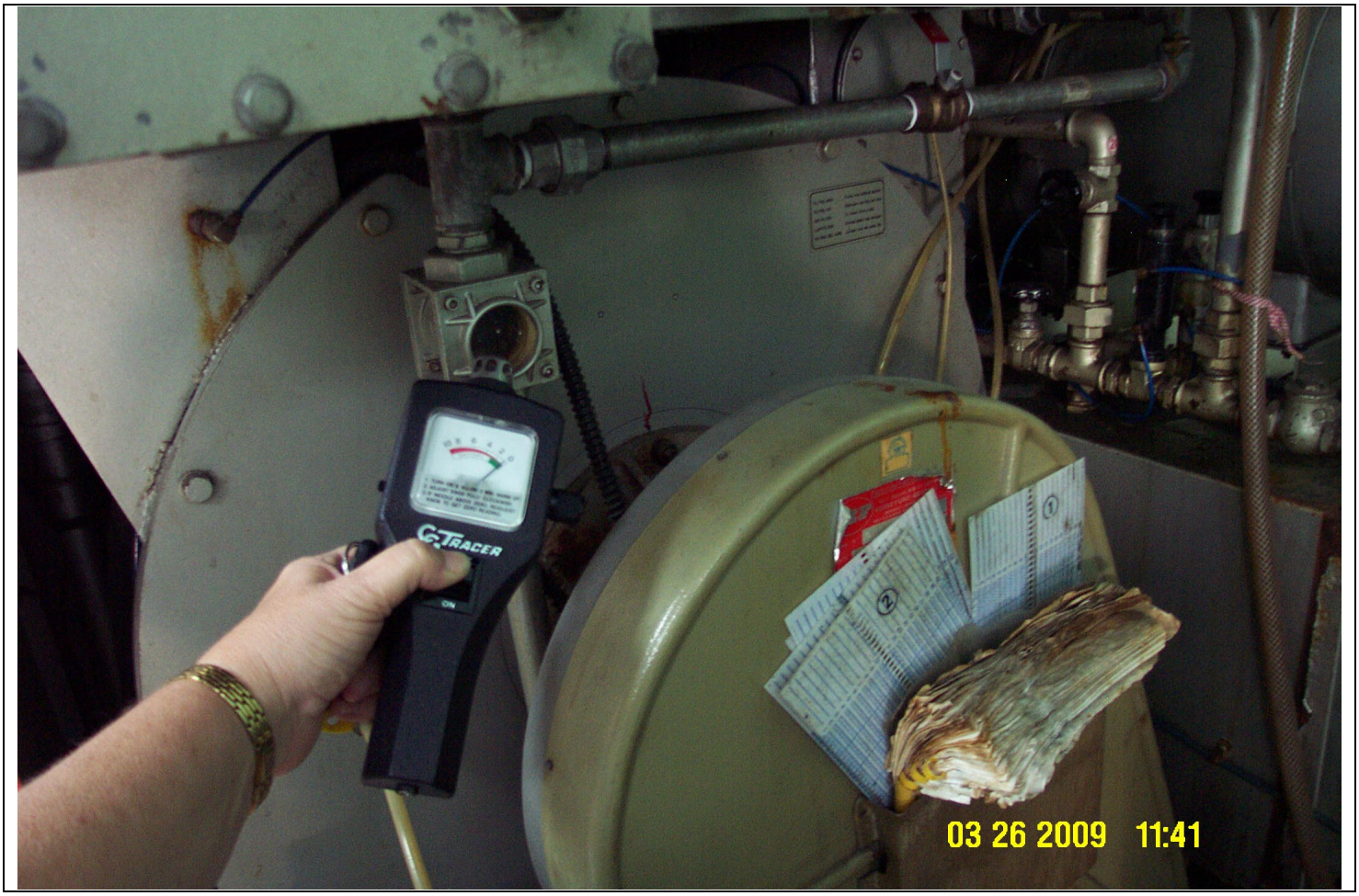
Inspector: Shea Jackson **Inspection Date:** 3/26/09

Source (EU): Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (1989). 15 HP propane fired boiler on-site.

Description: [This is use of the County Halogen detector and did not alarm on leak check around door.

Causeway Cleaners

2666 Bayshore Blvd., Palm Harbor



Project Id: 69085 **Permit No:** 1030415-003-AG **Arms Number:** 0415

Inspector: Shea Jackson **Inspection Date:** 3/26/09

Source (EU): Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (1989). 15 HP propane fired boiler on-site.

Description: [This is the use of the PC Halogen detector to leak check where the facilities detector alarmed. The PC Detector did not appear to be sensitive enough to detect the Perc leak.