



PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 103 0415	Date: 10/20/2010	Time In: 11:00 am	Time Out: 11:30
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:	1/13/2012
Facility Contact:	Steve Milby	Phone:	727-733-4206
Compliance Status:	<input checked="" type="checkbox"/> IN <input type="checkbox"/> MNC <input type="checkbox"/> SNC		

PART I: NOTIFICATION (Check appropriate box)

1. Existing facility notified DARM by 9/1/96	<input checked="" type="checkbox"/>
2. New facility notified DARM 30 days prior to startup	<input type="checkbox"/>
3. Facility failed to notify DARM to use general permit	<input type="checkbox"/>

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 <input checked="" type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> 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: 88 Gallons. Month with highest use was March 2010. Did facility exceed limits Y N

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? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 2. Examining the containers for leakage? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 3. Closing and securing machine doors except during loading/unloading? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | |
| 4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> 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? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> NA |
| 2. Equipped dry-to-dry machines with a closed-loop vapor venting system? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> NA |
| 3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> NA |
| 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> NA |
| 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45 ^o F? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> NA |
| 6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged? | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> 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? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N |
| 2. Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly?
Is the temperature differential equal to or greater than 10°F? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 3. Measured and recorded the perc concentration weekly at the end of the final drying cycle while the machine is venting to the atmosphere. If machines are equipped with a carbon adsorber?
Is the perc concentration or less than 10 ppm? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 4. Assured that the sampling position on adsorber exhaust for measuring perc concentrations is at least 10 duct diameters downstream of any bend, contraction, or expansion; is at least 10 diameters upstream from any bend contraction, or expansion; and downstream from the condenser inlet? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 5. Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 6. Routed airflow to the carbon adsorber (if used) at all times? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |

PART V: RECORDKEEPING REQUIREMENTS

Has the responsible official:

(Check appropriate boxes)

- | | |
|--|--|
| 1. Maintained receipts for perc purchased? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 2. Maintained rolling monthly averages of perc consumption? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> 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? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 4. Maintained calibration data? (<i>direct reading instruments only</i>) | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 5. Maintained exhaust duct monitoring data on perc concentrations? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 6. Maintained startup/shutdown/malfunction plan? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 7. Maintained deviation reports?
Problem corrected? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 8. Maintained compliance plan, if applicable? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |

PART VI: LEAK DETECTION AND REPAIRS

1. Does the responsible official conduct weekly leak detection and repair inspection?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
2. Which method of detection does the responsible official use?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Visual examination (condensed solvent of exterior surfaces)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Physical detection (airflow felt through gaskets)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Odor (noticeable perc odor)	<input type="checkbox"/> Y	<input type="checkbox"/> N			
Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N			
If using direct-reading instrumentation, is the equipment:	<input type="checkbox"/> Y	<input type="checkbox"/> N			
a. Capable of detecting perc vapor concentrations in a range of 0-500 ppm	<input type="checkbox"/> Y	<input type="checkbox"/> N			
b. Calibrated against a standard gas prior to and after each use (PID/FID only).	<input type="checkbox"/> Y	<input type="checkbox"/> N			
c. Inspected for leaks and obvious signs of wear on a weekly basis?	<input type="checkbox"/> Y	<input type="checkbox"/> N			
d. Kept in a clean and secure area when not in use.	<input type="checkbox"/> Y	<input type="checkbox"/> N			
e. Verified for accuracy by use of duplicate samples (calorimetric only)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
3. Has the facility maintained a leak log?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
4. The following area should be checked for leaks by the operator:	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Hose connections, fitting couplings, and valves	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Muck cookers	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Door gaskets and seating	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Stills	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Filter gaskets and seating	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Exhaust dampers	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Pumps	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Diverter valves	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Solvent tanks and containers	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Cartridge Filter housing	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Water separators	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			

Shea Jackson	October 20, 2010
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
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

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

- (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

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

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

ADDITIONAL SITE INFORMATION

Facility Name:	Causeway Cleaners
ARMS #:	103 0415

Inspection Comments:

- *I met with the facility contact and responsible official, Mr. Steve Milby.*
- *I observed the 2009 and 2010 calendar records. The records were reviewed for leak checks. Mr. Milby performs observations bi weekly. The source is exempt from the temperature reading requirements.*
- *The 12 month consecutive Month Perc totals for the highest usage rate was 88 gallons for March 2010. Mr. Milby stated he had not purchased Perc for 2010. The most recent purchase order was for 10/2009 for 5 gallons of Perc. . He said he typically only operates the dry to dry machine for 2 -3 cycles per week, and is doing more soap washing.*
- *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.*
- *Mr. Milby demonstrated the use of the TIF XL - 1A Halogen leak detector. He placed the detector around door and the equipment parts in the rear, button traps filter housing, cite ports and piping. There was an audible beep during the operation.*
- *The hazardous waste containers were closed and resting on a secondary containment tray.*
- *I gave Mr. Milby the inspection summary and two P2 brochures*
- *This source was 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? Y N
(Temperature of 45⁰F w/accuracy +/- 2⁰F, or 7.2EC w/accuracy of +/- 1.1⁰C)

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 #	V86-150-446	Serial #	Mfg yr 2001

Fuel Type: Natural gas? Propane? Fuel oil?

Comments: *The boiler is exempt*

Causeway Cleaners

2666 Bayshore Blvd., Palm Harbor



Project Id: 75678 **Permit No:** 1030415-003-AG **Arms Number:** 0415

Inspector: Shea Jackson **Inspection Date :** 10/20/2010

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

Description: [The dry to dry was not in operation at the time off inspection]

Causeway Cleaners
2666 Bayshore Blvd., Palm Harbor



Project Id: 75678 **Permit No:** 1030415-003-AG **Arms Number:** 0415

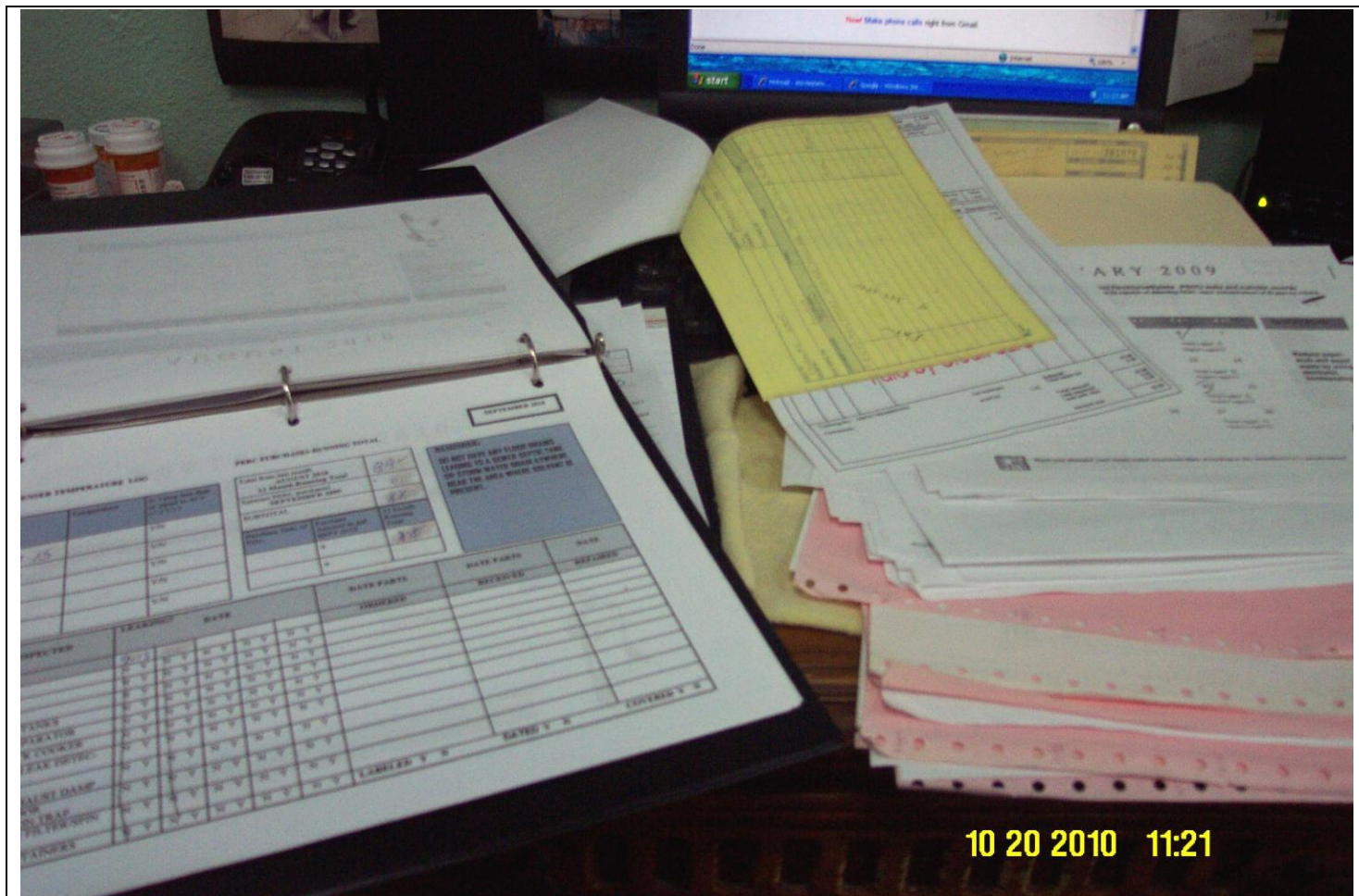
Inspector: Shea Jackson **Inspection Date :** 10/20/2010

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

Description: [The rear area of the dry to dry machine]

Causeway Cleaners

2666 Bayshore Blvd., Palm Harbor



Project Id: 75678 **Permit No:** 1030415-003-AG **Arms Number:** 0415

Inspector: Shea Jackson **Inspection Date :** 10/20/2010

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

Description: [Review 2009 and 2010 facilities records for Perc totals and leak detection and purchase orders]

Causeway Cleaners
2666 Bayshore Blvd., Palm Harbor



Project Id: 75678 **Permit No:** 1030415-003-AG **Arms Number:** 0415

Inspector: Shea Jackson **Inspection Date :** **October 20, 2010**

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

Description: [The Hurst boiler is located outside the shop in the back west side of property]