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: 9/26/2011** **Time In: 1:00pm** **Time Out: 1:30pm**		
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:	☒ **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 **N/A** 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: 0 Gallons. Month with highest use was n/a. 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?	☐ Y	☐ N	☒ NA
2. Examining the containers for leakage?	☐ Y	☐ N	☒ NA
3. Closing and securing machine doors except during loading/unloading?	☐ Y	☐ N	☒ NA
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 45^0 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 temp[illegible]re at the condenser inlet and outlet weekly?	☐Y ☐N ☐NA
Is the temperature differential equal to o[illegible]° F?	☐Y ☐N ☐NA
3. Measured and recorded th[illegible] concentration [illegible] weekly at the end of the final drying cycle while the [illegible]e is venting [illegible]rber, [illegible] machines are equipped with a carbon ad[illegible]er?	☐Y ☐N ☐NA
Is the pe[illegible]n e[illegible] or less tha[illegible] ppm?	☐Y ☐N ☐NA
4. Assured that the s[illegible]g po[illegible]on adsorber exhaust for measuring perc. concentrations is at [illegible]duct dia[illegible]ers downstream of any bend, contraction, or expansion; is at least [illegible]iameters upstream from any bend contraction, or expansion; and downstream from r[illegible]er 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 ☒ NA
2.	Maintained rolling monthly averages of perc consumption?	☐Y ☐N ☒ NA
3.	Maintained leak detection inspection and repair reports for the following:	☐Y ☐N ☒ NA
	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?	
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 ☒ NA
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 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)	☐Y	☒N
	Physical detection (airflow felt through gaskets)	☐Y	☒N
	Odor (noticeable perc odor)	☐Y	☒N
	Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	☐Y	☒N
	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 operator:**	☐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	September 26, 2011
Inspector's Name (Please Print)	Date of Inspection
	N/A Close File
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:

The facility removed the Perchloroethylene and 1989 CEF Rovin Machine Corp dry to dry and replaced with Bowe K-15 Hydrocarbon Machine. Mr. Milby stated he had changed his machine in November 2010. He sent a letter to the AQ office to rescind his permit on September 8, 2011. I observed the new machine. The facility purchased 50 gallons of ECOSOLV to fill. Mr. Milby stated he has not had to purchase more yet. He stated he had noticed did not clean as well, but he was glad he changed as was safer, more economical and less regulated .

ADDITIONAL SITE INFORMATION

Facility Name:	Causeway Cleaners
ARMS #:	103 0415

Machine #1:	Old Machine	*PERC*		
Manufacturer	CEF Rovin Machine Corp	*REMOVED*	*FROM SITE*	
Model#	Prestige 160	Serial#		Mfg yr
Machine #2:	New Machine	HYDRO		
Manufacturer	Bowe	CARBON		lbs
Model#	K-15	Serial#		Mfg yr

Notification (unpermitted sources only):

1. Was the facility assisted in filling out the notification by the inspector? ☐Y ☒ NA
2. Did the facility insist on filling out its own notification, and will send it to FDEP? ☐Y ☒ NA

Record keeping :

1. Does facility have statement/specs as to the design accuracy of the temperature sensor? ☐Y ☒ NA
   (Temperature of 45^0F w/accuracy +/– 2^0F, or 7.2EC w/accuracy of +/– 1.1^0C)

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 ☒ NA
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

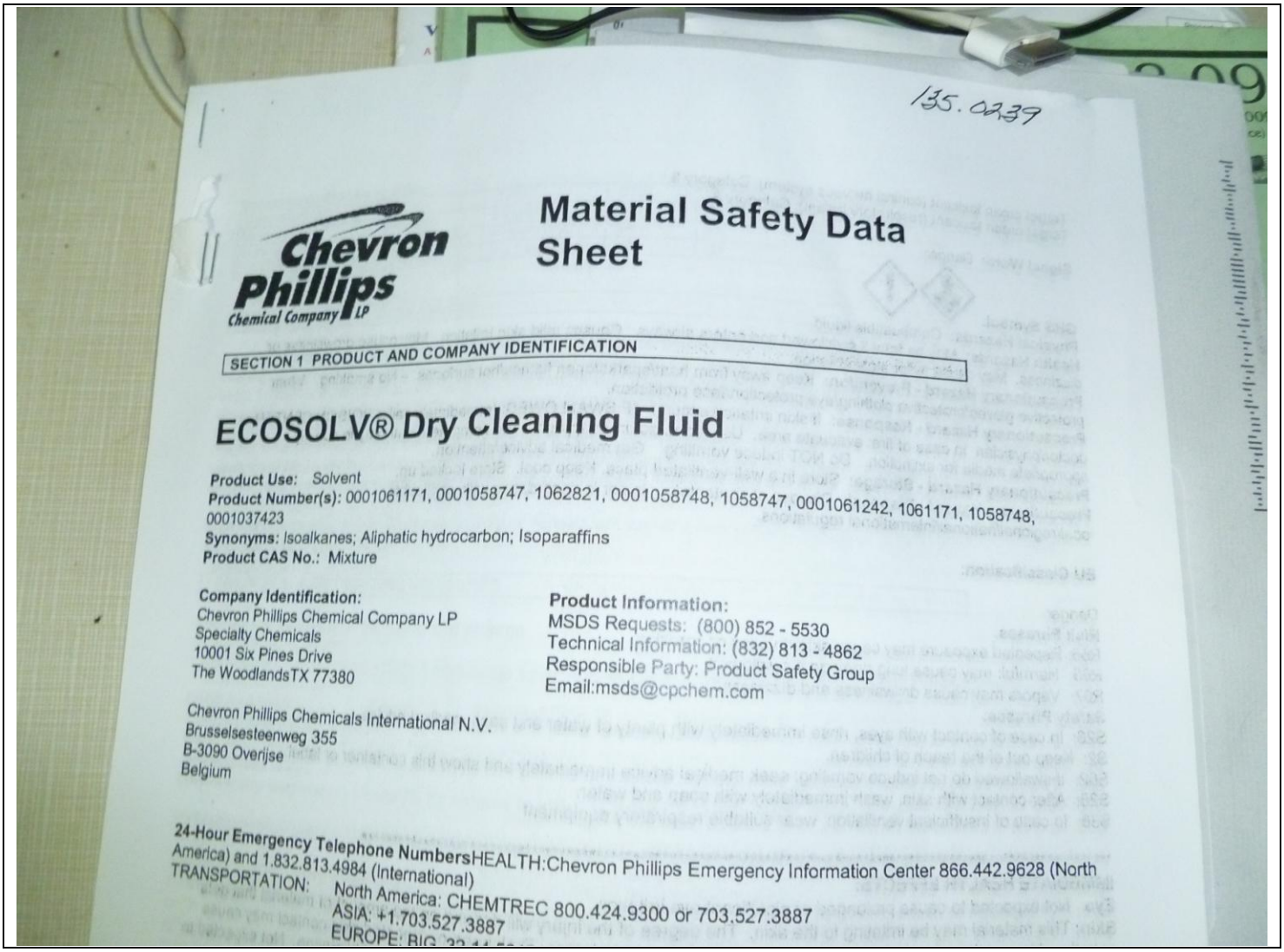
Fuel Type: Natural gas? ☒ Propane? ☐ Fuel oil? ☐

Comments:

exempt boiler

Causeway Cleaners

2666 Bayshore Blvd., Palm Harbor



135.0239

Chevron Phillips Chemical Company LP

Material Safety Data Sheet

SECTION 1 PRODUCT AND COMPANY IDENTIFICATION

ECOSOLV® Dry Cleaning Fluid

Product Use: Solvent
Product Number(s): 0001061171, 0001058747, 1062821, 0001058748, 1058747, 0001061242, 1061171, 1058748, 0001037423
Synonyms: Isoalkanes; Aliphatic hydrocarbon; Isoparaffins
Product CAS No.: Mixture

Company Identification:
Chevron Phillips Chemical Company LP
Specialty Chemicals
10001 Six Pines Drive
The WoodlandsTX 77380

Product Information:
MSDS Requests: (800) 852 - 5530
Technical Information: (832) 813 - 4862
Responsible Party: Product Safety Group
Email:msds@cpchem.com

Chevron Phillips Chemicals International N.V.
Brusselsesteenweg 355
B-3090 Overijse
Belgium

24-Hour Emergency Telephone NumbersHEALTH:Chevron Phillips Emergency Information Center 866.442.9628 (North America) and 1.832.813.4984 (International)
TRANSPORTATION: North America: CHEMTREC 800.424.9300 or 703.527.3887
ASIA: +1.703.527.3887
EUROPE: BIG

Project Id: 79907 **Permit No:** 1030415-003-AG **Arms Number:** 0415

Inspector: Shea Jackson **Inspection Date / Time:** 9/26/2011 / _____

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

Description: [ECOSOLVE dry cleaning fluid replaced the use of Perchloroethylene]

Causeway Cleaners

2666 Bayshore Blvd., Palm Harbor

Project Id: 79907 **Permit No:** 1030415-003-AG **Arms Number:** 0415

Inspector: Shea Jackson **Inspection Date / Time:** 9/26/2011 / _____

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

Description: [The facility's previous dry to dry had been removed and replaced with this BOWE K-15]

Causeway Cleaners

2666 Bayshore Blvd., Palm Harbor

Project Id: 79907 **Permit No:** 1030415-003-AG **Arms Number:** 0415

Inspector: Shea Jackson **Inspection Date / Time:** 9/26/2011

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

Description: [The ECOSOLV is filled from the base into these two vessels at the rear of the machine.