

PERCHLOROETHYLENE DRY CLEANERS



 $\boxtimes$ 

## COMPLIANCE INSPECTION CHECKLIST

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

<b>AIRS ID#:</b> 103 0417	Date: 12/3/12 Time In:	02:15pm Time Out: 02:45pm		
Facility Name:	Sam E. Rosie, Inc.			
Facility Location:	35230 U.S. Highway 19 North	35230 U.S. Highway 19 North		
	Palm Harbor, FL, 34684			
<b>Responsible Official:</b>	Rosie Dianna	<b>Phone No:</b> 727-891-1768		
Emis. Unit Description:	, , , , , , , , , , , , , , , , , , ,	e Dry Cleaner: One Dry-to-dry machine with a xempt 10 HP natural gas fired boiler is on-site.		
Permit Number:	1030417-004-AG	<b>Exp. Date:</b> 10/15/2016		
Facility Contact:	Rosie Dianna	<b>Phone:</b> 727-891-1768		
<b>Compliance Status:</b>				

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	Out of business Petroleum Solvent Only			
A 1				
1. Existing small area source	2. New small area source			
Dry-to-dry only, <b>x</b> < <b>140</b> gal/yr	Dry-to-dry only, <b>x</b> < <b>140</b> gal/yr			
Transfer only, x <200 gal/yr $\Box$	Transfer only, x <200 gal/yr $\boxtimes$			
Both types, x $<140$ gal/yr	Both types, x $<140$ gal/yr			
(Constructed before 12/9/91)	(Constructed on or after 12/9/91)			
3. Existing large area source	4. New large area source			
Dry-to-dry only, <b>140&gt; x &lt;2,100</b> gal/yr	Dry-to-dry only, <b>140&gt; x &lt;2,100</b> gal/yr			
Transfer only, 200> x <1,800 gal/yr	Transfer only, 200> x <1,800 gal/yr			
Both types, 140> x <1,800 gal/yr	Both types, 140> x <1,800 gal/yr			
(Constructed before 12/9/91)	(Constructed on or after 12/9/91)			
<b>This is a correct facility classification</b> $\boxtimes$ Y $\square$ N $\square$ Can not determine				
If no, please check the appropriate classification:				
$\boxtimes$ Facility qualified for a general permit as number <u>2</u> above.				
☐ Facility exceeds above limits and is not el	igible for a general permit			

B. Highest 12-month consecutive total of perchloroethylene purchased in the preceding 12-month period: <u>40.6</u> Gallons. Month with highest use was <u>November 2012</u>. Did facility exceed limits  $\Box Y \boxtimes N$ 

#### 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	$\Box$ N	□ NA
2. Examining the containers for leakage?	⊠ Y	$\Box$ N	□ NA
<ul><li>3. Closing and securing machine doors except during loading/unloading?</li><li>4. Draining cartridge filters in their housing or in sealed containers for at</li></ul>	⊠ Y	□N	
least 24 hours prior to disposal?	$\boxtimes \mathbf{Y}$	$\square$ N	$\Box$ 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 $45^{\circ}$ F?	⊠ Y	□N	□ NA
6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged?	ΩY	□ N	⊠ NA

B.	Has the responsible official of an existing large or new large area source also:	⊠Y □N
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 terr re at the condenser inlet and outlet weekly?	□Y □N ⊠NA
3.	Is the temperature differential equal to on the second sec	□Y □N □NA □Y □N □NA
4.	Assured that the s group on adsorber exhaust for measuring perc. concentrations is at duct diameters downstream of any bend, contraction, or expansion; is at least duct diameters upstream from any bend contraction, or expansion;	□Y □N □NA
	and downstream from not der 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?	
D	APT V. DECODDREEDING DECHIDEMENTS	
<b>r</b> <i>F</i>	ART V: RECORDKEEPING REQUIREMENTS	
	as the responsible official: heck appropriate boxes)	
1.	Maintained receipts for perc purchased?	⊠Y □N
2.	Maintained rolling monthly averages of perc consumption?	$\square Y \square N$
3.	<ul><li>Maintained leak detection inspection and repair reports for the following:</li><li>a. Documentation of leaks repaired w/in 24 hrs? or;</li><li>b. Documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt?</li></ul>	$ \begin{array}{c c} \Box Y & \Box N & \boxtimes NA \\ \Box Y & \Box N & \boxtimes NA \end{array} $
4.	Maintained calibration data? (direct reading instruments only)	$\Box Y \Box N \boxtimes NA$

4.	Maintained calibration data? (direct reading instruments only)	ĽΥ	□N
5.	Maintained exhaust duct monitoring data on perc concentrations?	ΠY	□N
6.	Maintained startup/shutdown/malfunction plan?	⊠Y	□N
7.	Maintained deviation reports? Problem corrected?		□N □N
8.	Maintained compliance plan, if applicable?	ПΥ	ΠN

⊠NA

⊠NA ⊠NA

⊠NA

# PART VI: LEAK DETECTION AND REPAIRS

1.	Does the responsible official conduct weekly lea	ak det	tection a	and repair inspection?	$\boxtimes \mathbf{Y}$	□N
2.	Which method of detection does the responsible official use?			$\boxtimes \mathbf{Y}$	$\Box N$	
	Visual examination (condensed solvent of	exteri	or surfa	ces)	$\boxtimes \mathbf{Y}$	□N
	Physical detection (airflow felt through ga	skets)			$\boxtimes \mathbf{Y}$	□N
	Odor (noticeable perc odor)				$\boxtimes \mathbf{Y}$	□N
	Use of direct-reading instrumentation (FII	D/PID/	calorim	etric tubes)	$\Box Y$	$\boxtimes N$
	If using direct-reading instrumentation, is the	equip	ment:		ΠY	ΠN
	a. Capable of detecting perc vapor concent	tration	is in a ra	inge of 0-500 ppm	ΠY	ΠN
	b. Calibrated against a standard gas prior t	to and	after eac	ch use (PID/FID only).	ΠY	ΠN
	<ul><li>c. Inspected for leaks and obvious signs of wear on a weekly basis?</li><li>d. Kept in a clean and secure area when not in use.</li></ul>			ΠY	ΠN	
				ΠY	ΠN	
	e. Verified for accuracy by use of duplicate samples (calorimetric only)?			ΠY	ΠN	
3.	Has the facility maintained a leak log?				$\boxtimes \mathbf{Y}$	□N
4.	The following area should be checked for leaks	s by th	ie opera	ntor:	$\boxtimes \mathbf{Y}$	□N
	Hose connections, fitting couplings, and valves	ΠY	$\boxtimes N$	Muck cookers	ΠY	$\boxtimes N$
	Door gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Stills	$\boxtimes \mathbf{Y}$	□N
	Filter gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Exhaust dampers	$\boxtimes \mathbf{Y}$	□N
	Pumps	ΠY	$\boxtimes N$	Diverter valves	ΠY	$\boxtimes N$
	Solvent tanks and containers	$\boxtimes \mathbf{Y}$	□N	Cartridge Filter housing	$\boxtimes \mathbf{Y}$	□N
	Water separators	$\boxtimes \mathbf{Y}$	$\Box N$			

Shea Jackson	12/3/12
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.)  $\boxtimes Y \quad \Box N \quad \Box NA$ 

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).  $\boxtimes$ Y  $\square$ N  $\square$ 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 of	or PCE gas analyzer	operated according to	the manufacturer's
instructions? $\boxtimes Y$	□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?  $\square Y \square N \square NA$ 

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?  $\Box Y \quad \Box N \quad \boxtimes NA$ 

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?  $\boxtimes Y \quad \Box N \quad \Box NA$ 

## ADDITIONAL SITE INFORMATION

Facility Name:	Sam E. Rosie, Inc.
ARMS #:	103 0417

#### **Inspection Comments:**

- *I met with Kevin Dianna, son of the Rosie Dianna, the responsible official for the dry-to-dry operations, she was not on site for the facility inspection.*
- *I observed the* 2011 2012 calendar records for the perchloroethylene totals and leak detection observations. (See Photo)
- The highest Perc total in the previous 12 month period was 40.60 gallons in November 2012. The purchase records and the hazardous waste manifest were in yellow folder with the calendar records. The most recent Perc P.O. was for 10/3/2012 purchase of 19.3 gallons. The last Hazardous waste disposal was 3/23/2012.
- The temperatures recorded ranged between of 40  $^{\circ}F 42^{\circ}F$ . The monitoring and recording of the leak checks were up to date in records.
- I observed the Aero Tech dry-to-dry machine and associated equipment; which was not in operation at this time. The machine is clean, no Perc odors detected.
- *The facility continues to operate the dry to dry machine for a 2cycles a week.*
- *Kevin could not demonstrate the use of TIF XP 1A model Halogen leak detector he was not familiar with how it operated. He could not get to operate; it appeared the battery was not working to check the dry to dry.*
- There were no perchloroethylene odors detected during the inspection of the facility.
- The perchloroethylene hazardous waste containers were closed and located in secondary containment. The separator water for hazardous waste disposal is collected for disposal. (See photos)
- I gave Kevin the inspection summary and noted the facility should keep a spare set for Halogen Detector.
- *He called Ms Diana Rosie, she stated the detector had worked during her last leak check, and she would get batteries for back up.*
- This facility was in compliance at this time.

# ADDITIONAL SITE INFORMATION

Facility Name:	Sam E. Rosie, Inc.
ARMS #:	103 0417

Machine #1:					
Manufacturer	Aero Tech	Capacity	40	lbs	
Model#	C402695	Serial#	BO2P55 CMT	Mfg yr	2000
Machine #2:					
Manufacturer		Capacity		lbs	
Model#		Serial#		Mfg yr	
Notification (	unpermitted sources only);	:			
1. Was the fac	ility assisted in filling out th	e notification by the inspec	ctor?	$\Box Y$	$\boxtimes N$
2. Did the faci	lity insist on filling out its o	wn notification, and will se	end it to FDEP?	$\Box Y$	$\boxtimes N$
<b>Record keepi</b>	ng:				
1. Does facilit	y have statement/specs as to	the design accuracy of the	temperature sensor?	$\boxtimes \mathbf{Y}$	$\Box N$
(Temp	erature of 45 <sup>0</sup> F w/accuracy -	$H - 2^{0}$ F, or 7.2EC w/accura	acy of $+/-1.1^{\circ}$ C)		
Hazardous W	-				
1. Is all perc. contaminated wastewater either treated or disposed of properly?				$\boxtimes \mathbf{Y}$	$\Box$ N
2. If wastewater is evaporated, is it an approved system, and using carbon filtration?				$\boxtimes \mathbf{Y}$	□N
3. Does the facility have secondary containment for the dry-dry machine?				$\boxtimes \mathbf{Y}$	□N
4. Does the facility have secondary containment for any perc. waste containers?					□N
<b>Boiler:</b>					
Manufacturer	Hurst			Hp 15	
Model #	JOR 15A - 100	Serial # 7797249	03	Mfg yr	
<ul> <li>Fuel Type: Natural gas? ⊠ Propane? □ Fuel oil? □</li> <li>Comments: The boiler is exempt from permitting, it is located outside on the west side of the building</li> </ul>					

# Sam E. Rosie, Inc. Royal Cleaners 35230 U.S. Highway 19 North, Palm Harbor



Project Id:	<u>84684</u>	Permit No: 1030417-004-AG	<b>Arms Number:</b> <u>0417</u>	
Inspector:	Shea Jackson	Inspection Date / Time: <u>12/3/201</u>	2 /	
Source (EU):	New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine with a refrigerated			
condenser. An exempt 10 HP natural gas fired boiler is on-site.				
Description:	[The dry to dry	machine was not in operation at time	of inspection.]	

# Sam E. Rosie, Inc. Royal Cleaners

35230 U.S. Highway 19 North, Palm Harbor



Project Id:	<u>84684</u>	Permit No: 1030417-004-AG	<b>Arms Number:</b> <u>0417</u>
Inspector:	Shea Jackson	Inspection Date / Time: <u>12/3/2012</u>	/
Source (EU):	New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine with a refrigerated		
condenser. An exempt 10 HP natural gas fired boiler is on-site.			

**Description:** [The rear of machine and secondary containment for the waste was located in this area. No perc odors detected]

# Sam E. Rosie, Inc. Royal Cleaners

35230 U.S. Highway 19 North, Palm Harbor



Project Id:	<u>84684</u>	Permit No: 1030417-004-AG	<b>Arms Number:</b> <u>0417</u>	
Inspector:	Shea Jackson	Inspection Date / Time: <u>12/3/20</u>	12 /	
Source (EU):	New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine with a refrigerated			
condenser. An exempt 10 HP natural gas fired boiler is on-site.				
<b>Description:</b>	[The records for	or 2011 and 2012 were reviewed and u	p to date at time of inspection]	