



# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

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

<b>AIRS ID#:</b> 103 0417	<b>Date:</b> 10/24/13	<b>Time In:</b> 2:15PM	<b>Time Out:</b> 2:40PM
<b>Facility Name:</b>	Sam E. Rosie, Inc.		
<b>Facility Location:</b>	35230 U.S. Highway 19 North Palm Harbor, FL, 34684		
<b>Responsible Official:</b>	Rosie Diana	<b>Phone No:</b>	727-891-1768
<b>e-mail:</b>	rdiana0621@gmail.com		
<b>Emis. Unit Description:</b>	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>Permit Number:</b>	1030417-004-AG	<b>Exp. Date:</b>	10/15/2016
<b>Facility Contact:</b>	Rosie Diana	<b>Renewal Date:</b>	9/15/2016
<b>e-mail:</b>	rdiana0621@gmail.com	<b>Phone:</b>	727-891-1768
<b>Compliance Status:</b>	<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

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.**

<p><b>1. Existing small area source</b>          Dry-to-dry only, x &lt;140 gal/yr <input type="checkbox"/></p> <p>Transfer only, x &lt;200 gal/yr <input type="checkbox"/></p> <p>Both types, x &lt;140 gal/yr          (Constructed before 12/9/91)</p> <p><b>3. Existing large area source</b>          Dry-to-dry only, 140&gt; x &lt;2,100 gal/yr <input type="checkbox"/></p> <p>Transfer only, 200&gt; x &lt;1,800 gal/yr <input type="checkbox"/></p> <p>Both types, 140&gt; x &lt;1,800 gal/yr          (Constructed before 12/9/91)</p>	<p><b>2. New small area source</b>          Dry-to-dry only, x &lt;140 gal/yr <input checked="" type="checkbox"/></p> <p>Transfer only, x &lt;200 gal/yr <input checked="" type="checkbox"/></p> <p>Both types, x &lt;140 gal/yr          (Constructed on or after 12/9/91)</p> <p><b>4. New large area source</b>          Dry-to-dry only, 140&gt; x &lt;2,100 gal/yr <input type="checkbox"/></p> <p>Transfer only, 200&gt; x &lt;1,800 gal/yr <input type="checkbox"/></p> <p>Both types, 140&gt; x &lt;1,800 gal/yr          (Constructed on or after 12/9/91)</p>
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**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 \_\_\_ 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:** 40.6 Gallons. Month with highest use was September 2013. 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 checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 2. Equipped dry-to-dry machines with a closed-loop vapor venting system?   | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input 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 checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis?                       | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F?                          | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA |
| 6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged? | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input 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?  Y  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?  Y  N  NA  
 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 atmosphere. If machines are equipped with a carbon adsorber?  
Is the perc concentration or less than 10 ppm?  Y  N  NA  
 Y  N  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?  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?  
Problem corrected?  Y  N  NA  
 Y  N  NA
8. Maintained compliance plan, if applicable?  Y  N  NA

**PART VI: LEAK DETECTION AND REPAIRS**

<b>1. Does the responsible official conduct weekly leak detection and repair inspection?</b>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
<b>2. Which method of detection does the responsible official use?</b>	<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 checked="" 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			
<b>If using direct-reading instrumentation, is the equipment:</b>	<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 type="checkbox"/> Y	<input type="checkbox"/> N			
<b>3. Has the facility maintained a leak log?</b>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
<b>4. The following area should be checked for leaks by the operator:</b>	<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 24, 2013
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:** Sam E. Rosie, Inc.  
**ARMS #:** 103 0417

### Inspection Comments:

- *I met with Kevin Dianna the facility contact., for the dry-to-dry inspection, Rosie Dianna the responsible official was not on site at this time.*
- *The purchase records and the hazardous waste manifest were in yellow folder with the calendar records.*
- *The most recent Perc P.O. was for 10/20/2013 purchase of 19.3 gallons.*
- *The last Hazardous waste disposal was 4 drums with total 300lbs on 7/18/2013. (See Photos)*
- *I reviewed the 2012 – 2013 calendar records for the perchloroethylene totals and leak detection observations, the records were complete and up to date. (See Photo)*
- *The highest Perc total in the previous 12 month period was 40.60 gallons in September 2013, the current month was 21.3 gallons.*
- *The temperatures recorded ranged between of 40 °F – 41°F. The monitoring and recording of the leak checks were up to date in records. (See Photos)*
- *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 2 cycles a week.*
- *Kevin showed the TIF XP 1A model Halogen leak detector was operational.*
- *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 facility contact, the inspection summary report copy.*
- *This facility was in compliance at this time.*

**ADDITIONAL SITE INFORMATION**

<b>Facility Name:</b>	Sam E. Rosie, Inc.
<b>ARMS #:</b>	103 0417

<b>Machine #1:</b>				
Manufacturer	Aero Tech	Capacity	40	lbs
Model#	C402695	Serial#	BO2P55 CMT	Mfg yr 2000

<b>Machine #2:</b>				
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 45<sup>0</sup>F w/accuracy +/- 2<sup>0</sup>F, or 7.2EC w/accuracy of +/- 1.1<sup>0</sup>C)

**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:**

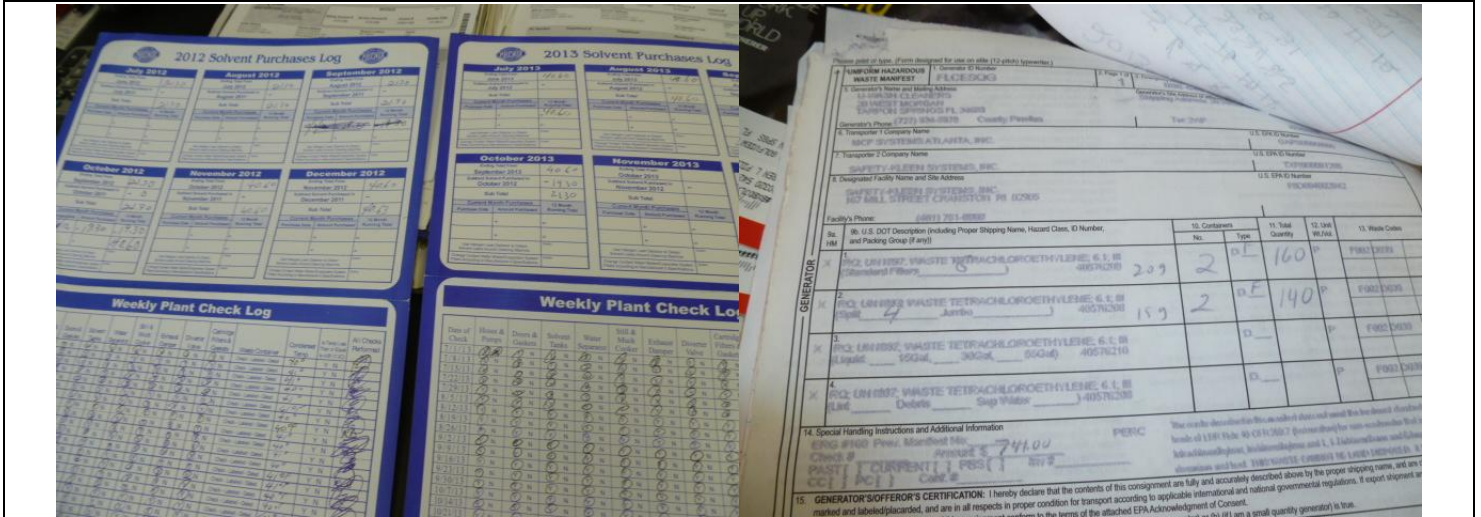
Manufacturer	Hurst		15	Hp
Model #	JOR 15A - 100	Serial #	779724903	Mfg yr

Fuel Type:    Natural gas?                          Propane?                        Fuel oil?           

**Comments:**    Exempt size unit

# Sam E. Rosie, Inc. Royal Cleaners

35230 U.S. Highway 19 North, Palm Harbor



**Project Id:** 88181                      **Permit No:** 1030417-004-AG                      **Arms Number:** 0417

**Inspector:** Shea Jackson                      **Inspection Date / Time:** 10/24/2013 / \_\_\_\_\_

**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 2012 and 2013 calendar records were completed and up to date. The 2013 Hazardous waste and purchase invoices are keep in yellow folder]



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



**Project Id:** 88181      **Permit No:** 1030417-004-AG      **Arms Number:** 0417

**Inspector:** Shea Jackson      **Inspection Date / Time:** 10/24/2013 / \_\_\_\_\_

**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 hazardous waste drum is at rear of machine, dry to dry was not in operation. There were no Perc odors or leaks observed at the rear of machine in this area.]