



# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0910077 **DATE:** 6/26/08 **ARRIVE:** 12:56 pm **DEPART:** 1:35 pm

**FACILITY NAME:** MAGIC TOUCH CLEANERS

**FACILITY LOCATION:** 327 E Racetrack Road  
FT WALTON BEACH 32547-2569

**OWNER/AUTHORIZED REPRESENTATIVE:** YU HO **PHONE:** (850)862-6010

**CONTACT NAME:** Mike Ganhs **PHONE:**

**ENTITLEMENT PERIOD:** 12/5/2003 / 12/5/2008  
(effective date) (end date)

**PART I: INSPECTION COMPLIANCE STATUS** (check ☒ only one box)

☒ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE

**PART II: FACILITY CLASSIFICATION - Rule 62-213.300 FAC**

(check ☒ only one box in A)

**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,  $140 \leq x \leq 2,100$  gal/yr  
transfer only,  $200 \leq x \leq 1,800$  gal/yr  
both types,  $140 \leq x \leq 1,800$  gal/yr  
(constructed before 12/9/91)

**4. New large area source** ☐

dry-to-dry only,  $140 \leq x \leq 2,100$  gal/yr  
transfer only,  $200 \leq x \leq 1,800$  gal/yr  
both types,  $140 \leq x \leq 1,800$  gal/yr  
(constructed on or after 12/9/91)

**5. Ineligible for General Permit** ☐

drop store/out of business/petroleum  
facility exceeds above limits

**B.** The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 60 gallons.

**PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC**(check ☒ only one box  
for each question)**Does the responsible official of the dry cleaning facility:**

1. Store perc, and wastes containing perc, in tightly sealed & impervious containers? ☒ Yes ☐ No ☐ N/A
2. Examine the containers for leakage? ----- ☒ Yes ☐ No ☐ N/A
3. Close and secure machine doors except during loading/unloading? ----- ☒ Yes ☐ No
4. Drain cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? ----- ☐ Yes ☐ No ☒ N/A
5. Maintain solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? ----- ☐ Yes ☐ No ☒ N/A

**PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC**(Refer to Part II-A.1.-4. Classification: page 1 of 4, this form)

1. If the facility classification is a **Existing small area source**, no controls are required. **Proceed to Part V.**
2. If the facility classification is a **New small area source**, the machine should be equipped with a refrigerated condenser. **Complete section A. below.**
3. If the facility classification is a **Existing large area source**, the machine should be equipped with either a refrigerated condenser or a carbon adsorber. **Complete both sections A and B below.** *Carbon adsorber must have been installed prior to September 22, 1993*
4. If the facility classification is a **New large area source**, the machine should be equipped with a refrigerated condenser. **Complete both sections A and B below.**

**A. Has the responsible official of all existing large area & new sources:**(check ☒ only one box for  
each question)

1. Equipped all machines with the appropriate vent controls? ----- ☒ Yes ☐ No
2. Equipped dry-to-dry machines with a closed-loop vapor venting system? ----- ☒ Yes ☐ No ☐ N/A
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? ----- ☒ Yes ☐ No ☐ N/A
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? ----- ☒ Yes ☐ No
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F? ----- ☐ Yes ☐ No ☒ N/A
6. Conducted all temperature monitoring after an appropriate cool-down period and after verifying that the coolant had been completely charged? ----- ☒ Yes ☐ No

**PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)****B. Does the responsible official of an existing large or new large area source also:**(check ☒ only one box for each question)

1. Measure and record the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis? ----- ☐ Yes ☐ No
2. Measure and record the washer exhaust temperature at the condenser inlet and outlet weekly? ----- ☐ Yes ☐ No ☒ N/A
  - a) Is the temperature differential equal to, or greater than 20° F? ----- ☐ Yes ☐ No ☒ N/A
3. Measure and record the perc concentration in the exhaust stream weekly at the end of the final drying cycle while the machine is venting to the adsorber, if machines are equipped exclusively with a carbon adsorber? ----- ☐ Yes ☐ No ☒ N/A
  - a) Is the perc concentration equal to, or less than 100 ppm? ----- ☐ Yes ☐ No ☒ N/A
4. Assure that the sampling port on the carbon adsorber exhaust for measuring perc concentrations is at least 8 duct diameters downstream of any bend, contraction, or expansion; is at least 2 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet? ----- ☐ Yes ☐ No ☒ N/A
5. Equip transfer machines (dryers, reclaimers, and washers) with individual condenser coils? ----- ☐ Yes ☐ No ☒ N/A
6. Route airflow to the carbon adsorber (if used) at all times? ----- ☐ Yes ☐ No ☒ N/A

**PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC****Does the responsible official:**(check ☒ only one box for each question)

1. Maintain receipts for perc purchased? ----- ☒ Yes ☐ No
2. Maintain rolling monthly total of yearly perc consumption? ----- ☒ Yes ☐ No
3. Maintain leak detection inspection and repair reports for the following:
  - a) documentation of leaks repaired w/in 24 hrs? or; ----- ☒ Yes ☐ No ☐ N/A
  - b) documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? ----- ☐ Yes ☐ No ☒ N/A
4. Maintain calibration data? (*for applicable direct reading instruments*) ----- ☐ Yes ☐ No ☒ N/A
5. Maintain exhaust duct monitoring data on perc concentrations? ----- ☐ Yes ☐ No ☒ N/A
6. Maintain a startup/shutdown/malfunction plan? ----- ☒ Yes ☐ No
7. Maintain deviation reports? ----- ☐ Yes ☐ No ☒ N/A
  - a) Problem corrected? ----- ☐ Yes ☐ No ☒ N/A
8. Maintain a compliance plan, if applicable? ----- ☐ Yes ☐ No ☒ N/A

**PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC**(check ☒ only one box for each question)

1. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak

detection and repair inspection? -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Does the facility maintain a leak log? -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3. Does the responsible official check the following areas for leaks?		
a) Hose connections, fittings, couplings, and valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
b) Door gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
c) Filter gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
d) Pumps -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
e) Solvent tanks and containers--	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
f) Water separators -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
g) Muck cookers -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
h) Stills -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
i) Exhaust dampers -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
j) Diverter valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
k) Cartridge filter housings	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
4. Which method(s) of detection (is/are) used by the responsible official?		
a) Visual examination (condensed solvent on exterior surfaces) -----	a) <input checked="" type="checkbox"/>	
b) Physical detection (airflow felt through gaskets) -----	b) <input checked="" type="checkbox"/>	
c) Odor (noticeable perc odor) -----	c) <input checked="" type="checkbox"/>	
d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) -----	d) <input type="checkbox"/> ** (see below)	
e) Halogen leak detector -----	e) <input type="checkbox"/>	
<b>**If using direct-reading instrumentation, is the equipment: -----</b>		
1) Capable of detecting perc vapor concentrations in a range of 0-500 ppm? -----	1) <input type="checkbox"/> Yes	<input type="checkbox"/> No
2) Calibrated against a standard gas prior to and after each use (PID/FID only)? -----	2) <input type="checkbox"/> Yes	<input type="checkbox"/> No
3) Inspected for leaks and obvious signs of wear on a weekly basis? -----	3) <input type="checkbox"/> Yes	<input type="checkbox"/> No
4) Kept in a clean and secure area when not in use? -----	4) <input type="checkbox"/> Yes	<input type="checkbox"/> No
5) Verified for accuracy by use of duplicate samples (calorimetric only)? -----	5) <input type="checkbox"/> Yes	<input type="checkbox"/> No

Chris Stoll

June 26, 2008

Inspector's Name (Please Print)

Date of Inspection

/s/

June 2009

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** On June 26, 2008, I conducted an unannounced compliance inspection at the Magic Touch Cleaners located in Okaloosa County. I met with Mr. Mike Ganhs, who showed me around the facility and provided me with the records that are being maintained for the machine. The perchloroethylene dry cleaning machine was not in operation at the time of the inspection.

As a reminder, on July 27, 2006, the Environmental Protection Agency (EPA) strengthened air toxics requirements for all dry cleaners that use the chemical perchloroethylene (PERC). The new rule requires that all area source dry cleaners use a halogen leak detector monthly to detect PERC leaks and maintain records. Also, both new and existing dry cleaners must still perform weekly or bi-weekly leak checks on each machine. All leak detection checks and findings must be recorded on your dry cleaning compliance calendar.

On July 31, 2008, the Department sent a letter to Magic Touch Cleaners to remind you of the July 28, 2008 timeframe to begin using a halogenated hydrocarbon detector or PCE gas analyzer and to submit, by registered mail, a notification of compliance status. The Department has not received a response from Magic Touch Cleaners. A copy of the July 31, 2008 letter is attached to this inspection report, as is a notification form, developed by the Small Business Environmental Assistance Program (SBEAP), to assist you in complying with requirements. Failure to comply with the requirements may result in an enforcement action.

Department records show that the facility's eligibility to operate under the air general permit established at Rule 62-213.300(1)(a), Florida Administrative Code, expires on December 5, 2008. If you intend to continue to operate the facility beyond this date, Part III of the Perchloroethylene Dry Cleaner Air General Permit Notification Form should be completed and submitted to the Department at least 30 days prior to the expiration date. A new notice must be submitted prior to November 5, 2008. Parts I through III of the Perchloroethylene Dry Cleaner Air General Permit Notification Form are enclosed.