



# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0910077 **DATE:** 6/16/09 **ARRIVE:** 2:54 PM **DEPART:** 3:26 PM  
**FACILITY NAME:** MAGIC TOUCH  
**FACILITY LOCATION:** 327 NE RACETRACK RD  
 FT WALTON BEACH 32547-2569  
**OWNER/AUTHORIZED REPRESENTATIVE:** CHIN YU **PHONE:** (850)862-6010  
**CONTACT NAME:** **PHONE:**  
**ENTITLEMENT PERIOD:** 11/17/2008 / 11/17/2013  
 (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? -----  Yes  No
2. Does the facility maintain a leak log? -----  Yes  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 | g) Muck cookers -----        | <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 | h) Stills -----              | <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 | i) Exhaust dampers -----     | <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 | j) Diverter valves -----     | <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 | k) Cartridge filter housings | <input type="checkbox"/> Yes            | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| f) Water separators -----                                  | <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"/>               |
- \*\*If using direct-reading instrumentation, is the equipment:** ----- \*\*  N/A
- |  |                                 |                             |
|--|---------------------------------|-----------------------------|
| 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 |

Jennifer Waltrip

June 16, 2009

Inspector's Name (Please Print)  
*Jennifer Waltrip*  
Inspector's Signature

Date of Inspection  
June 2010  
Approximate Date of Next Inspection

**COMMENTS:** On June 16, 2009, a Department representative conducted an unannounced annual air program compliance inspection of Magic Touch Cleaners located in Okaloosa County. Mr. Chin Ho Yu, owner, was available to assist during the inspection.

Mr. Yu led a tour of the facility. The dry-to-dry machine was installed 12-13 years ago and less than 140 gal/yr of perc is purchased; therefore it is a new small area source. All perc is stored within the machine. All chemicals kept on site have secondary containment. Mr. Yu produced logs which detailed yearly perc purchased with running annual totals for each month. Receipts for each purchase were available for inspection. The logs also included weekly inspections, leak checks, repairs and temperature checks. No leaks were noted on the logs; therefore, no documentation of repairs or parts ordered was available.

The facility does not have a halogenated leak detector onsite for monthly leak checks. Please note that 40 CFR Part 63.322(n)(1) states that the owner or operator of a dry cleaning system shall inspect the components listed in paragraph (k) of this section for vapor leaks monthly while the component is in operation. 40 CFR Part 63.322(n)(1)i states area sources shall conduct the inspections using a halogenated hydrocarbon detector or PCE gas analyzer. Not using a halogenated leak detector for monthly leak checks is a violation of your permit and your facility is not in compliance. Within 15 days of receipt of this report, please notify this office as to what steps you have taken to correct this deficiency.

A follow up inspection will be performed soon at your facility. The failure to obtain a halogenated hydrocarbon detector or PCE gas analyzer will result in an enforcement action.

The start up/shut down malfunction plan was not available for inspection. However, Mr. Yu is the only operator and understands the steps that must be taken if a malfunction occurs. Please note that Rule 62-213.300(1)(3)a, F.A.C., states that the responsible official shall maintain on site a startup, shutdown, malfunction plan for the facility that describes, in detail, procedures for operating and maintaining the equipment during periods of startup, shutdown, and malfunction. The plan may be in the form of an equipment operation manual and shall also specify corrective action for malfunctioning process and air pollution control equipment. Please ensure that during any future inspections a startup, shutdown, malfunction plan is available for review.