PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☐ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO: Inactivate Facility

AIRS ID#: 1050322 **DATE:** 03242009 **ARRIVE:** Inactivate **DEPART:** Facility

FACILITY NAME: WRIGHTS DRY CLEANER

FACILITY LOCATION: 2510 Ave G NW

WINTER HAVEN 33880-

OWNER/AUTHORIZED REPRESENTATIVE: SUJATA PATEL **PHONE:** (863)294-2061

CONTACT NAME: Inactivate Facility **PHONE:** Inactivate

ENTITLEMENT PERIOD: 5/20/2004 (effective date) / 5/20/2009 (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 ≤ 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)

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 gallons.

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC

Does the responsible official of the dry cleaning facility:

(check ☑ only one box for each question)

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 ----------	☐Yes	☐No	☐N/A	g) Muck cookers ----------	☐Yes	☐No	☐N/A
b) Door gaskets and seating ------	☐Yes	☐No	☐N/A	h) Stills ----------	☐Yes	☐No	☐N/A
c) Filter gaskets and seating------	☐Yes	☐No	☐N/A	i) Exhaust dampers -------	☐Yes	☐No	☐N/A
d) Pumps ----------	☐Yes	☐No	☐N/A	j) Diverter valves ---------	☐Yes	☐No	☐N/A
e) Solvent tanks and containers--	☐Yes	☐No	☐N/A	k) Cartridge filter housings	☐Yes	☐No	☐N/A
f) Water separators ----------	☐Yes	☐No	☐N/A				

4. Which method(s) of detection (is/are) used by the responsible official?

a) Visual examination (condensed solvent on exterior surfaces) ---------- a)☐
b) Physical detection (airflow felt through gaskets) ---------- b)☐
c) Odor (noticeable perc odor) ---------- c)☐
d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) ---------- d)☐**(see below)
e) Halogen leak detector ---------- e)☐

****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)☐Yes ☐No
2) Calibrated against a standard gas prior to and after each use (PID/FID only)? ------- 2)☐Yes ☐No
3) Inspected for leaks and obvious signs of wear on a weekly basis? ---------- 3)☐Yes ☐No
4) Kept in a clean and secure area when not in use? ---------- 4)☐Yes ☐No
5) Verified for accuracy by use of duplicate samples (calorimetric only)? ---------- 5)☐Yes ☐No

Joseph V. Panetta
Inspector's Name (Please Print)

Inspector's Signature

03/24/2009
Date of ~~Inspection~~ Report

In activate Facility

Approximate Date of Next Inspection

COMMENTS: The last inspection I conducted at this facility was 02/12/2008. The facility was in compliance. The owner explained he was going to remove his perc machine and install non perc dry cleaning system.

On March 8, 2009 the Department received a letter from the owner of this facility stating he had installed a new machine --NOVA, model # 35, serial # 629-0333 on March 31st, 2008 and is no longer using perc.. The new machine uses Exxon Mobil Chemical DF-200 Fluid Aliphatic Hydro Carbon.

I discussed this with Hazardous waste inspector Shannon Camp. Shannon provided me with documentation stating the perc machines were removed and a new hydrocarbon machine is in place.

Also attached is a report from Polk County Health Department stating perc machines removed and facility using Exxon Mobil Chemical DF-200 Fluid Aliphatic Hydro Carbon.

I will forward these reports to Danielle Henry and Dick Dibble to inactivate this facility.

WRIGHT'S CLEANERS
2510 AVE G. N.W
WINTER-HAVEN FL 33880
(863) 294-2061
3-3-2009

To,

FLORIDA DEPARTMENT OF ENVIROMENTAL PROTECTION
13051 N. TELECOM PARKWAY
TEMPLE-TERRACE - FL - 33637
Att: MR JOE PANETTA

Dear Sir,

This is to inform you that wright's cleaners has installed Union Drycleaning Machine (NOVA 35)(model #) Serial # 62[illegible] on March 31st 2008 and is using Exxon Mobil Chemical DF-2000 FLUID Aliphatic Hydrocarbon product for the machine & has eliminated the perk product completely since the installation & a new dry cleaning machine by Union is replaced using hydrocarbon products. Wright's cleaners do no have any drycleaning equipment which uses perk. If you have any questions please be free to call or write at the above address. Thanking you —

We remain Sincerely

Hash & Sujata Patel
Wright's cleaners.

VALUE ENVIRONMENTAL SERVICES, INC.
9608 128th Terr. N. #102, Largo, Florida 33773-1223
727-542-2023 / Fax 727-586-6919

Ms. Shannon Camp
Environmental Specialist
FL Dept. Environmental Protection
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
813-632-7600 x 473

October 8, 2008

RE: Leachfield Sampling Results for
Wright's Dry Cleaners
2510 Ave. G NW
Winter Haven, FL

Dear Ms. Camp:

Value Environmental Services, Inc. (VES) was retained to assist Wright's Dry Cleaners with the potential solvent issues related to a recent septic tank sampling event. The facility had been in cleanup under the Dry Cleaner Program and had received a No Further Action designation. On April 16, 2008, the Polk County Department of Health (DOH) collected a routine sample from the septic tank that services this property. Tetrachloroethene (PCE) was detected at 5.6 micrograms per liter (ug/L); above the Florida Department of Environmental Protection (FDEP) Groundwater Cleanup Target Level (GCTL) of 3.0 ug/L. Methylene Chloride was detected at 4.8 ug/L; below the FDEP GCTL of 5 ug/L. The FDEP requested additional groundwater sampling data from the downgradient site of the septic leachfield to determine if the PCE had spread beyond the septic tank.

On October 1, 2008, VES met with you and Andrea Stermer of Polk County to perform a facility inspection and collect groundwater samples downgradient of the septic tank leachfield.

Facility Inspection

The facility had converted to non-solvent cleaners and the septic tank had been cleaned and drained several times. A new Union Nova 35 dry cleaning machine had been installed. There were still several 5-gallon containers of solvent condensate staged inside of the building inside of a secondary containment tray situated on the concrete floor. The facility operator explained that they could not afford to remove all of the containers at once, so they made arrangements with Safety Kleen to take one container per month. Although the condensate from the new dry cleaner machine was non-solvent based, the operator was disposing of the process water along with the solvent waste. No solvent-based materials were identified during the inspection. The County requested that the drum of petroleum-based cleaner be placed inside of secondary containment. The County and FDEP representatives were then satisfied with the facility condition and no re-inspection was required.

Groundwater Sampling

VES identified an existing monitoring well on the south side of the septic area next to the garage wall (**Figure 1**). The well was constructed of 1" OD PVC with a total depth of 10'. The depth-to-water (DTW) was 3.5'. FDEP agreed that this well was adequately located and could be used for the groundwater sampling.

Received 10/9/08

VES collected groundwater samples from this well designated as "Leachfield-1." Sampling was performed per the FDEP Standard Operating Procedure (SOP) prescribed sampling techniques. Prior to sampling, the water level was measured in the well and the purge volume was calculated. The monitoring well was purged using a Geotech peristaltic pump equipped with dedicated, disposable polyethylene tubing. Each well volume of water purged from the monitoring well was monitored for pH, conductivity, temperature, and dissolved oxygen using a YSI Model 556 multimeter and for turbidity using a Hach turbidity meter. The well was purged until temperature, pH, conductivity, dissolved oxygen, and turbidity water quality parameters stabilized in accordance with the FDEP SOP. A total of five volumes had to be removed because the Turbidity stayed above 20 NTU.

Following well purging, the monitoring well was sampled in accordance with the FDEP SOP by removing the tubing from the well, reversing the direction on the peristaltic pump and decanting the groundwater into the appropriate, laboratory-supplied containers. Once collected, the groundwater samples were stored in an iced cooler for preservation. The groundwater samples were transported under proper chain-of-custody documentation to Millennium Labs, Inc. for the analysis of Volatile Organic Halogens (VOH) using EPA Method 8260. The Groundwater sampling log and field instrument calibration record are provided in **Attachment A**.

Analytical Results

The laboratory analytical report is included in **Attachment B**. The results of the laboratory analyses indicated that PCE was not present above the laboratory method detection limit (MDL) of 0.23 ug/L. The compound cis-1,2 Dichloroethene (DCE) was detected at 19 ug/L; well below the GCTL of 70 ug/L.

Discussion

The interview with the facility operator and the facility inspection indicated that solvent-based cleaners were no longer in use at the site. The residual solvent waste containers were staged inside of secondary containment located on the concrete floor inside of the building. There were no proximal floor drains. Although the septic tank was reportedly drained several times, the tank had contained solvent wastes for over 20 years. The solvents likely seeped into the concrete walls of the septic tank and could be leaching into the septic fluids. Although the PCE concentrations detected in the septic tank fluids were above the GCTL, the relative concentrations were still relatively low. DCE is a degradation isomer of PCE. The absence of PCE and presence of DCE downgradient of the leachfield indicates that natural attenuation factors are in effect in the leachfield.

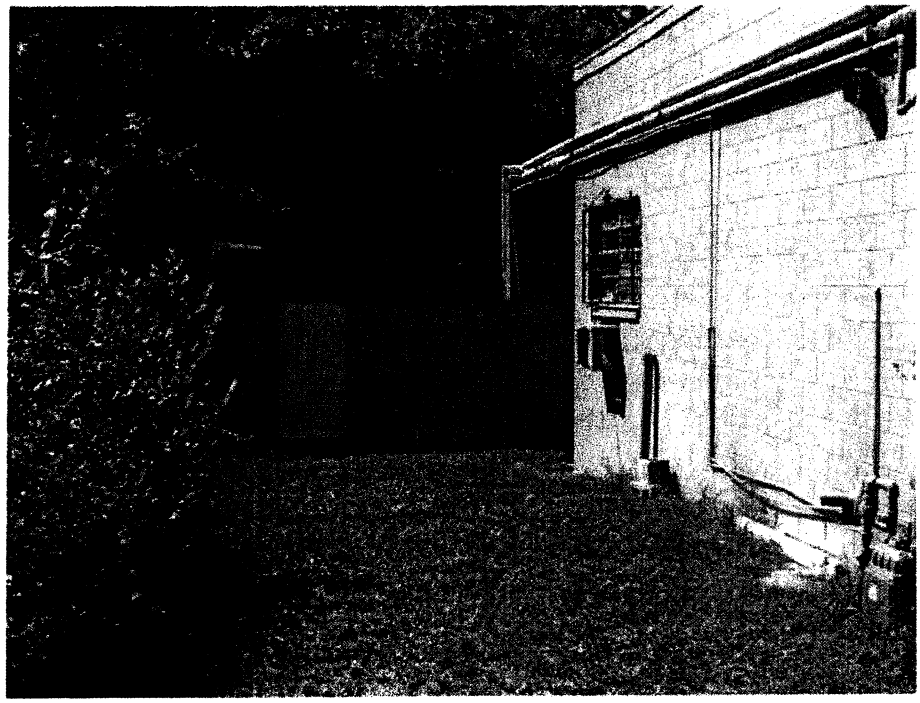
Recommendation

It may take some time for the residual PCE to completely leach out of the concrete walls of the septic tank. Additional periodic draining of the septic tank may be beneficial. Due to the low concentrations, it appears that the leachfield is providing natural degradation of the residual PCE that does exit the septic tank.

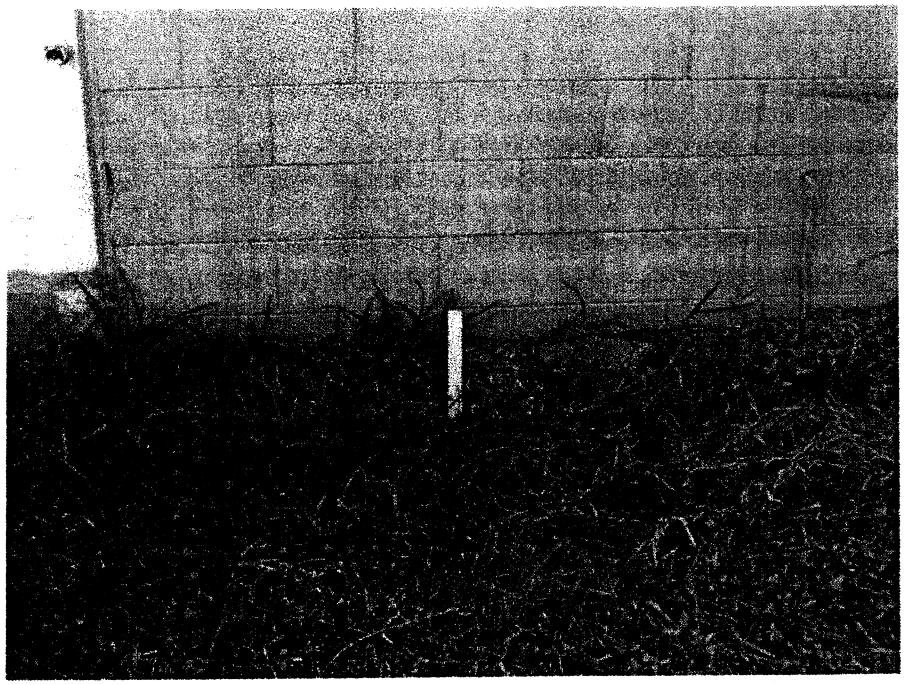
If you have any questions regarding this report, please call me at 727-542-2023.

Melinda Hamsher, P.G.
Date: October 8, 2008
FL Professional Geologist #1925

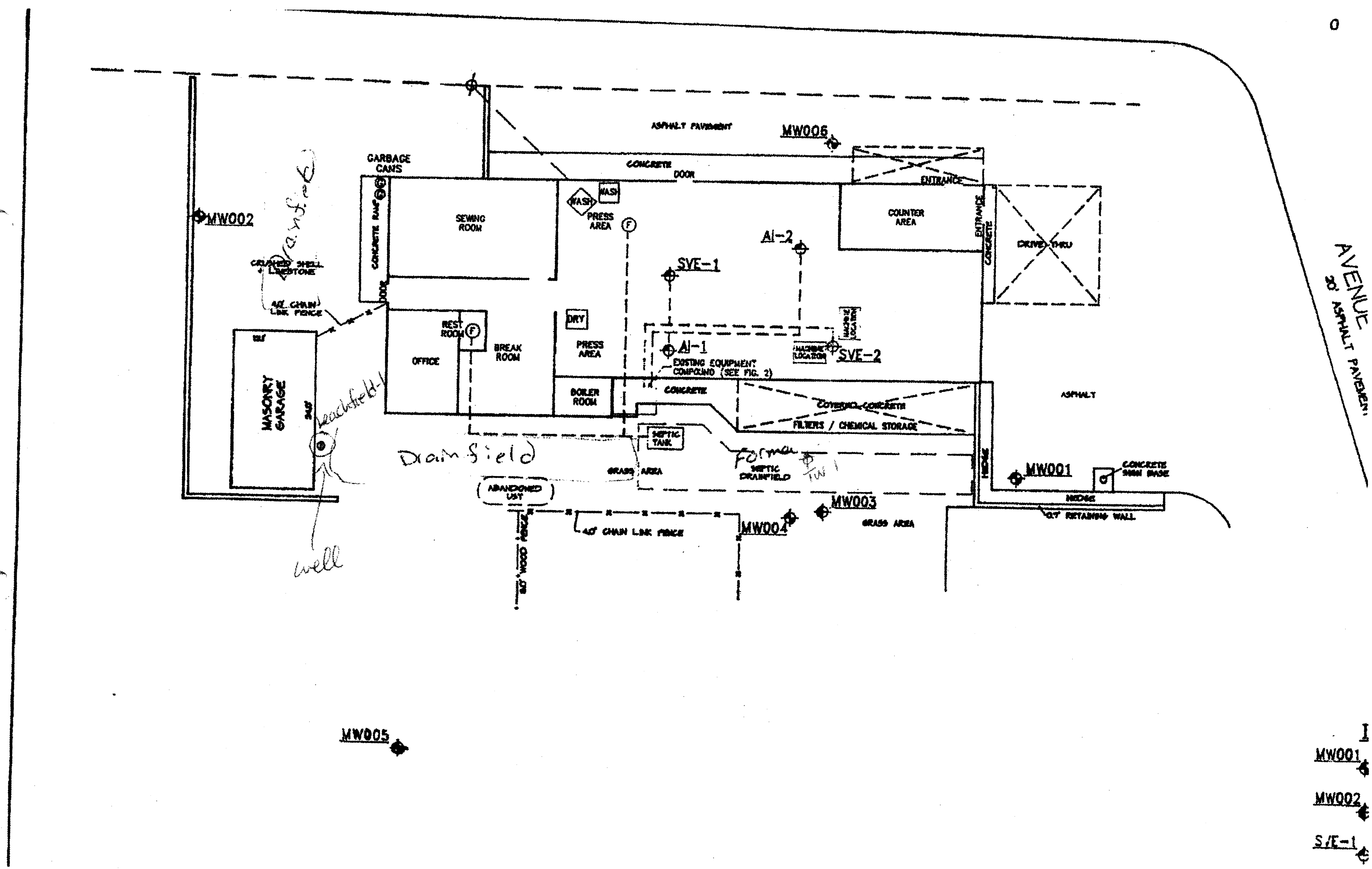
Wright's Cleaners
2510 Ave. .G NW, Winter Haven, FL



View looking south from the septic tank down the leachfield. The monitoring well is located of the right of the garage door.



Close-up of the monitoring well, designated as Leachfield-1.



ASPHALT PAVEMENT
MW006
CONCRETE
DOOR
ENTRANCE
GARBAGE CANS
MW002
CONCRETE RAMP
SEWING ROOM
WASH
PRESS AREA
COUNTER AREA
ENTRANCE
CONCRETE
DRIVE THRU
AVENUE
20' ASPHALT PAVEMENT
AI-2
SVE-1
CRUSHED SHELL & LIMESTONE
4.0' CHAIN LINK FENCE
DOOR
DRY
REST ROOM
OFFICE
BREAK ROOM
PRESS AREA
AI-1
EXISTING EQUIPMENT COMPOUND (SEE FIG. 2)
MACHINE LOCATION
SVE-2
MASONRY GARAGE
BOILER ROOM
CONCRETE
COVERED CONCRETE
FILTERS / CHEMICAL STORAGE
ASPHALT
SEPTIC TANK
GRASS AREA
SEPTIC DRAINFIELD
HEDGE
MW001
CONCRETE SIGN BASE
ABANDONED UST
MW003
4.0' CHAIN LINK FENCE
MW004
GRASS AREA
0.7' RETAINING WALL
6.0' WOOD FENCE
MW005
MW001
MW002
S/E-1

Facility Detailed List Report

Number of Facilities = 1

Facility Info

Facility ID	County	Status	EPA ID	Other ID	Old Fac. ID	Follow Up
83085	Polk	A - Active - Waste Generator	FLD982170672		5320090	N - None Needed
Facility Name	**Mailing Address**	**Location Address**	**Contact**	**Title**	**Phone**	**E-mail Address**
Wrights Dry Cleaners	2510 Avenue G Nw Winter Haven, FL 33880	2510 Avenue G Nw Winter Haven, 33880	Sue Patel	Owner	(863) 294-2061	
SIC Code	**Gen Stat**	**Total HW Disposal**	**Data Type**	**Date**	**Org Contact**	**Org Code**
7216 - Services - Dry Cleaning Plants, Except Rug	N - NOT A HAZARDOUS WASTE GENERATOR	0	V - Verification By On-Site Visit	10/1/2008	A Stermer	53 - Polk
Full-Time Employees		**Facility Updated Date**				
3		10/14/2008				

Comments:

Comment Date	Comment
8/20/2001	See Notes
10/1/2008	I Performed An Inspection With Shannon Camp, Fdep And Melinda Hamsher, Value Environmental Services Who Were Onsite To Take A Sample From The Monitoring Well. Previously There Had Been A Clean-Up Onsite. They Have Changed To A New Machine That Uses Df2000. I Advised That The Drums Of Df2000 And Any Other Dry Cleaning Solvents Must Be Moved Into The Area That Has Secondary Containment. I Also Advised That The Condensate Water Contaiminated With Df2000 Solvent Only, Should Be Managed As An Industrial Waste, Since They Are On A Septic System--A Stermer

Waste Info

Waste Type	Storage Method	Disposal Method	Mo. (Units)	Max Mo. (Lbs)	Lbs/ Year	Disposal Location	Ques Storage	Ques Disposal	RCRA Hazardous
LDEB - Fluorescent Lamps/Devices	OG - Other Good	AD - Awaiting Disposal - Planned	2 (4 FT FLUORESCENT TUBES)	1	6	On-Site	N	N	N

Activity Info

Activity Type	Description	Activity Date	Return To Compliance Date
DX	Other materials(specify in comments)	10/1/2008	
FE	FAIL TO LABEL UW LAMP CONTAIN. 62-737.400(5)(B)(1)	10/1/2008	
MM	Fluorescent lamps/Mercury Containing Devices	10/1/2008	
SD	SECON. CONTAIN. DRY CLEAN SOLV 376.3078(9)(A)(B)	10/1/2008	

Signature: _____

Date: _____