



# PERCHLOROETHYLENE DRY CLEANERS



Environmental Compliance

## COMPLIANCE INSPECTION CHECKLIST

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

**1010368**  
**AIRS ID#: DATE: 12182007**      **ARRIVE: 0859**      **DEPART: 1001**

**FACILITY NAME:** LIBERTY CLEANERS

**FACILITY LOCATION:** 2412 Land O'Lakes Blvd  
 LAND O'LAKES 34639

**OWNER/AUTHORIZED REPRESENTATIVE:** DILIP PATEL      **PHONE:** (813)949-3454

**CONTACT NAME:** DILIP PATEL      **PHONE:** (813)949-3454

**ENTITLEMENT PERIOD:** 10/25/2003 / 10/25/2008  
 (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)

<p><b>A. 1. Existing small area source</b> <input type="checkbox"/>          dry-to-dry only, <math>x &lt; 140</math> gal/yr          transfer only, <math>x &lt; 200</math> gal/yr          both types, <math>x &lt; 140</math> gal/yr          (constructed before 12/9/91)</p>	<p><b>2. New small area source</b> <input checked="" type="checkbox"/>          dry-to-dry only, <math>x &lt; 140</math> gal/yr          transfer only, <math>x &lt; 200</math> gal/yr          both types, <math>x &lt; 140</math> gal/yr          (constructed on or after 12/9/91)</p>
<p><b>3. Existing large area source</b> <input type="checkbox"/>          dry-to-dry only, <math>140 \leq x \leq 2,100</math> gal/yr          transfer only, <math>200 \leq x \leq 1,800</math> gal/yr          both types, <math>140 \leq x \leq 1,800</math> gal/yr          (constructed before 12/9/91)</p>	<p><b>4. New large area source</b> <input type="checkbox"/>          dry-to-dry only, <math>140 \leq x \leq 2,100</math> gal/yr          transfer only, <math>200 \leq x \leq 1,800</math> gal/yr          both types, <math>140 \leq x \leq 1,800</math> gal/yr          (constructed on or after 12/9/91)</p>

**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 100.10 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 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		

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

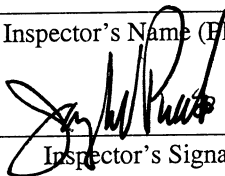
1) Capable of detecting perc vapor concentrations in a range of 0-500 ppm? -----	1) <input type="checkbox"/> Yes <input type="checkbox"/> No
2) Calibrated against a standard gas prior to and after each use (PID/FID only)? -----	2) <input type="checkbox"/> Yes <input type="checkbox"/> No
3) Inspected 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

Joseph V Panetta

12182007

Inspector's Name (Please Print)

Date of Inspection



2008

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** Spoke Mr. Patel. Conducted inspection. No records were available at time of inspection. Gave Mr. Mr. Patel a Field Warning Notice for not having records.gave him until 01/14/2008 to have records. Mr. Patel called 01/15/2008 to let me know he had the records available for inspection. I expalined I would make a follow up visit. During the inspection I left Mr. Patel a copy of the registration form and let him know his permit/registration expired 10/25/2008 and he should make sure a registration form arrives in Tallahassee before 09/24/2008. I also left Mr. Patel a copy SBEAP contact information.



**Florida Department of Environmental Protection**  
Southwest District Office

**FIELD WARNING NOTICE**

Name / Owner / Operator: DILIP PATEL  
 Address: 2412 Land o' Lakes Blvd  
 Location / Source: Land o' Lakes 34635  
 Permit Number: 1010368 Permit Exp. Date: 10/25/2008 Date and Time: 12/18/07

The purpose of this notice is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. Florida Department of Environmental Protection (DEP) personnel conducted a field inspection on the date listed above at the location described above. Florida DEP personnel observed the following, which indicates that a violation of Florida Statutes and Rules may exist at the above described facility: *(For example, Where was the activity observed? How was it discovered? Who provided information to the inspector?)*

Observations: 12 month Rolling Average use of Peric is not calculated in Calendar. Receipts are Available. MR Patel said he will update that portion of Calendar. MR Patel stated he will have calendar updated 1/14/08. Re-inspect after 1/14/08  
 Rule or Statute Relevant to Observations \_\_\_\_\_ Permit Condition No. \_\_\_\_\_

<input type="checkbox"/>	<b>Unconfined Particulate Matter.</b> Rule 62-296.320(4)(c)1, Florida Administrative Code (F.A.C.), provides that no person shall cause, let, permit, suffer or allow the emission of unconfined particulate matter from any activity, without taking reasonable precautions to prevent such emissions.		
<input type="checkbox"/>	<b>Operating Without a Permit.</b> Rule 62-210.300, F.A.C., provides that, unless exempted from permitting or unless specifically authorized, the owner or operator of any facility or emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department.		
<input type="checkbox"/>	<b>Violation of Permit Condition(s).</b> Rule 62-4.160(1), F.A.C., The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S.		
<input type="checkbox"/>	<b>Objectionable Odor.</b> Rule 62-296.320(2), F.A.C., provides that no person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.		
<input type="checkbox"/>	<b>Excessive Visible Emissions.</b> Rule 62-296.320(4)(b)1., F.A.C., provides that no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity.		
<input type="checkbox"/>	<b>Open Burning.</b> With few exceptions, Rule 62-296.320(3), F.A.C., prohibits open burning in connection with industrial, commercial, or municipal operations.		
<input type="checkbox"/>	<b>Constructing Without a Permit.</b> Rule 62-4.210, F.A.C., provides that no person shall construct any installation or facility which will reasonably be expected to be a source of air or water pollution without first applying for and receiving a construction permit from the Department.		
<input checked="" type="checkbox"/>	<b>Other.</b> <u>See observations</u>		<u>↓</u>

The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of the above-described statutes or rules should be ceased. The operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the administrative imposition of penalties up to \$10,000.00 pursuant to Section 403.121, Florida Statutes (F.S.), or the judicial imposition of civil penalties up to \$10,000.00 per violation per day pursuant to Sections 403.141 and 403.161, F.S.

You are requested to contact Joseph Panetta at the address or telephone number below within fifteen (15) days of receipt of this Field Warning Notice. Please be advised that this Field Warning Notice is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), F.S. We look forward to your cooperation in completing the investigation and resolution of this matter.

Received by: [Signature] Issued / Posted by: [Signature]  
 Print: Dilip Patel Print: Joseph J. Panetta  
 Title: President