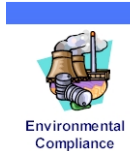




PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 103 0451	Date: 1/6/2009 Time In: 2:05AM Time Out: 2:35PM
Facility Name:	CJ & LM Enterprises, Inc.
Facility Location:	1850 Main Street Dunedin, FL, 34698
Responsible Official:	Cuong Van Phu Phone No: 727-734-3353
Emis. Unit Description:	New, Large Perchloroethylene Dry Cleaner: Consists of 2 1999 Realstar 473 Dry-To-Dry Machines with Refrigerated Condensers. A 15 hp natural gas fired boiler is on-site.
Permit Number:	1030451-005-AG Exp. Date: 9/26/12
Facility Contact:	Cuong Van Phu Phone: 727-734-3353
Compliance Status:	<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.

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)

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)

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)

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)

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 4 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: 193.7 and 154.5 Gallons. Total for two machines is 348.2

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 | |
| 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 type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" 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 | |
| 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45o 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 | |

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? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 2. Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly?
Is the temperature differential equal to or less than 10°F? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> 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? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 4. Assured that the sampling point 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? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 5. Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |
| 6. Routed airflow to the carbon adsorber (if used) at all times? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA |

PART V: RECORDKEEPING REQUIREMENTS

Has the responsible official:

(Check appropriate boxes)

- | | |
|--|--|
| 1. Maintained receipts for perc purchased? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 2. Maintained rolling monthly averages of perc consumption? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 3. Maintained leak detection inspection and repair reports for the following:
a. Documentation of leaks repaired w/in 24 hrs? or;
b. Documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 4. Maintained calibration data? (<i>direct reading instruments only</i>) | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 5. Maintained exhaust duct monitoring data on perc concentrations? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 6. Maintained startup/shutdown/malfunction plan? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| 7. Maintained deviation reports?
Problem corrected? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 8. Maintained compliance plan, if applicable? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |

PART VI: LEAK DETECTION AND REPAIRS

1.	Does the responsible official conduct a weekly leak detection and repair inspection?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
2.	Which method of detection does the responsible official use?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
	Visual examination (condensed solvent of exterior surfaces)	<input checked="" type="checkbox"/>	
	Physical detection (airflow felt through gaskets)	<input checked="" type="checkbox"/>	
	Odor (noticeable perc odor)	<input checked="" type="checkbox"/>	
	Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	<input type="checkbox"/>	
	If using direct-reading instrumentation, is the equipment:	<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 checked="" type="checkbox"/> Y	<input type="checkbox"/> N
	d. Kept in a clean and secure area when not in use.	<input checked="" 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
3.	Has the facility maintained a leak log?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
4.	The following area should be checked for leaks by the inspector:	<input type="checkbox"/> Y	<input type="checkbox"/> N
	Hose connections, fitting couplings, and valves	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Muck cookers
	Door gaskets and seating	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Stills
	Filter gaskets and seating	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Exhaust dampers
	Pumps	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Diverter valves
	Solvent tanks and containers	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Cartridge Filter housing
	Water separators	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	

Shea Jackson	1/6/2009
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:	CJ & LM Enterprises, Inc.
ARMS #:	103 0451

I met with the facility contact, John Phu, the responsible official, Mr. Cuong Van Phu was not present at the shop at this time.

- I observed the dryers were not in operation at this time. There were no Perc odors detected during the observation of the facilities two machines. The equipment appeared to be in good condition; no leaks were observed, and all containers were closed. (See photos0.*
- John Phu obtained the calendar records, from the responsible official office. He stated that he does not maintain the records, and that Mr. Cuong Phu performed the inspections, and maintained the records. I reviewed the 2007 and 2008 calendars for both units 1 & 2. (black and white)*
- The Calendar records were up to date. The temperature ranges were between 4 °C for the machines. This is below the 7.5 C.*
- Mr. Cuong Phu now keeps the invoices stapled in the calendar, so that they can be checked during inspections*
- The most recent purchase invoices were with the calendar records for purchases orders on 5/29/2008 and 11/20/2008 for 19.3 gallons each for each machine.*
- The highest total for No. 1 (Black) was 193.70 gallons, and No. 2 (white) was 154.4 gallons for a total of 348.1 gallons in December 2008. The facility is still classified as a new large.*
- The Hazardous waste containers closed and sitting within the secondary containment, beside the machines (See photo)*
- I left the annual certification for signature, and requested it be mailed after it was signed by Mr. Cuong. It was returned to our office on 1/8/2009 (See copy)*
- Mr. Phu did not know where the Halogen detector was kept, he had to call Mr. Chong, and a co worker demonstrated how he checked the machine. The TIF RX 1A sounded an audible beep, through out the demonstration, and did not sound a constant alarm as would be heard if a leak was located. The detector was kept in a case with manual, that states is certified SAE 1627 for 0.4 oz/yr (See photos)*
- I left the Inspection summary, a copy of the rule for information on where to download the records 2009 calendar and a copy of the P2R2 booklet and pamphlet.*
- This source appears to be in compliance at this time.*

ADDITIONAL SITE INFORMATION

Facility Name:	CJ & LM Enterprises, Inc.
ARMS #:	103 0451

Machine #1:			
Manufacturer	Realstar 473	Capacity	lbs
Model#		Serial#	Mfg yr
Machine #2:			
Manufacturer	Realstar 473	Capacity	lbs
Model#		Serial#	Mfg yr
<p>Notification (unpermitted sources only):</p> <p>1. Was the facility assisted in filling out the notification by the inspector? <input type="checkbox"/>Y <input checked="" type="checkbox"/>N</p> <p>2. Did the facility insist on filling out its own notification, and will send it to FDEP? <input type="checkbox"/>Y <input checked="" type="checkbox"/>N</p> <p>Record keeping :</p> <p>1. Does facility have statement/specs as to the design accuracy of the temperature sensor? <input checked="" type="checkbox"/>Y <input type="checkbox"/>N (Temperature C) <input type="checkbox"/>1.1C w/accuracy of <input type="checkbox"/>F, or 7.2 <input type="checkbox"/>2F w/accuracy <input type="checkbox"/>of 45</p> <p>Hazardous Waste:</p> <p>1. Is all perc. contaminated wastewater either treated or disposed of properly? <input checked="" type="checkbox"/>Y <input type="checkbox"/>N</p> <p>2. If wastewater is evaporated, is it an approved system, and using carbon filtration? <input checked="" type="checkbox"/>Y <input type="checkbox"/>N</p> <p>3. Does the facility have secondary containment for the dry-dry machine? <input checked="" type="checkbox"/>Y <input type="checkbox"/>N</p> <p>4. Does the facility have secondary containment for any perc. waste containers? <input checked="" type="checkbox"/>Y <input type="checkbox"/>N</p> <p>Boiler:</p> <p>Manufacturer Hurst Hp 50</p> <p>Model # 4DTG25 Serial # 330A –120 Mfg yr</p> <p>Fuel Type: Natural gas? <input checked="" type="checkbox"/> Propane? <input type="checkbox"/> Fuel oil? <input type="checkbox"/></p> <p>Comments:</p>			