

PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNU	JAL (INS1, INS2)	COMPLAINT/DISCOVERY (CI)		
RE-IN	SPECTION (FUI)	ARMS COMPLAINT NO:		
AIRS ID#:	Date: 10/13/2010	Time In: 10:40AM Time Out: 11:30AM		
103 0451				
Facility Name:	CJ & LM Enterprises,	Inc.		
Facility Location:	1850 Main Street			
	Dunedin, FL, 34698			
Responsible Official:	Cuong Van Phu	Phone No: 727-734-3353		
· ·		ethylene Dry Cleaner: Consists of 2 1999 Realstar	•	
Emis. Unit Description:	-	n Refrigerated Condensers. A 15 hp natural gas fire	ed boiler	
Th 1/ NT 1	is on-site.	F D (0/0//0010		
Permit Number:	1030451-005-AG	Exp. Date: 9/26/2012		
Facility Contact:	Cuong Van Phu	Phone: 727-734-3353		
Compliance Status:		NC SNC		
	AT (con 1 1 1)			
PART I: NOTIFICATIO	N (Check appropriate box)			
1. Existing facility notified	d DARM by 9/1/96			
2. New facility notified Da	ARM 30 days prior to st	artup	\boxtimes	
3. Facility failed to notify	DARM to use general p	permit		
PART II: CLASSIFICAT	TION			
Facility indicated on notif	fication form that it is:	:		
No Notification Form	Drop-Off Store	e Out of business Petroleum Solver	nt Only	
A.				
1. Existing small area		2. New small area source		
Dry-to-dry only, $x < 140$		Dry-to-dry only, $x < 140$ gal/yr		
Transfer only, $x < 200 g$	-	\Box Transfer only, x <200 gal/yr		
Both types, $x < 140 \text{ gal/}$	•	Both types, x <140 gal/yr		
(Constructed before 12	, , , , , , , , , , , , , , , , , , ,	(Constructed on or after 12/9/91)		
3. Existing large area s		4. New large area source		
Dry-to-dry only, 140>	, C ,	Dry-to-dry only, 140> $x < 2,100$ gal/yr		
Transfer only, 200> x <		Transfer only, $200 > x < 1,800 \text{ gal/yr}$	\boxtimes	
Both types, $140 > x < 1$,	_ ,	Both types, 140> x <1,800 gal/yr		
(Constructed before 12	(/9/91)	(Constructed on or after 12/9/91)		
This is a correct facility c	lassification 🖂	Y □ N □ Can not determine		
	the appropriate classi	_		
	ed for a general permit a			
		ot eligible for a general permit		
B. Highest 12-month consecutive total of perchloroethylene purchased in the preceding 12-month				
period: 87.3 Gallons. Month with highest use was $10/10$. Did facility exceed limits $\Box Y \boxtimes N$				

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? $\boxtimes Y$ $\prod N$ \square NA 2. Examining the containers for leakage? $\bowtie Y$ $\prod N$ $\prod NA$ 3. Closing and securing machine doors except during loading/unloading? $\bowtie Y$ $\prod N$ 4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? $\boxtimes Y$ \square N \sqcap NA 5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? $\prod N$ $\prod Y$ \boxtimes 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) $\boxtimes Y$ $\prod N$ $\prod NA$ 1. Equipped all machines with the appropriate vent controls? $\boxtimes Y$ \square N $\prod NA$ 2. Equipped dry-to-dry machines with a closed-loop vapor venting system? 3. Equipped the condenser with a diverter valve so airflow will be directed away from the $\bowtie Y$ $\prod N$ $\prod NA$ condenser upon opening the door? 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated $\prod Y$ $\prod N$ $\prod NA$ condenser on a weekly basis? 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the $\bowtie Y$ $\prod N$ \square NA condenser exceeded 45° F? 6. Conducted all temperature monitoring after an appropriate cool down period and after $\boxtimes Y$ \square N \square NA verifying the coolant had been completely charged? 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? $\square Y \square N$ 2. Measured and recorded the washer exhaust temre at the condenser inlet and outlet $\square N \square NA$ $\square Y$ weekly? °F? Is the temperature differential equal to or $\square Y \square N \square NA$ 3. Measured and recorded the concentration weekly at the end of the oper, machines are equipped final drying cycle while the e is venting with a carbon and $\square N \square NA$ | |Y

Is the per

or less the

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ppm?

 $\square Y \square N \square NA$

6	Assured 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 dust diameters upstream from any bend contraction, or expansion; and downstream from no other inlet?	□Y	□NA
	Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?	□Y □N [□NA
6.	Routed airflow to the carbon adsorber (if used) at all times?	□Y □N [□NA
PAl	RT V: RECORDKEEPING REQUIREMENTS		
	the responsible official: eck appropriate boxes)		
1.	Maintained receipts for perc purchased?	$\boxtimes Y \square N$	
2.	Maintained rolling monthly averages of perc consumption?	⊠Y □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?		⊠NA ⊠NA
4.	Maintained calibration data? (direct reading instruments only)	□Y □N [⊠NA
5.	Maintained exhaust duct monitoring data on perc concentrations?	□Y □N [⊠NA
6.	Maintained startup/shutdown/malfunction plan?	$\boxtimes Y \square N$	
7.	Maintained deviation reports? Problem corrected?		⊠NA ⊠NA
8.	Maintained compliance plan, if applicable?	□Y □N [⊠NA

PA	RT VI: LEAK DETECTION AND REPAIRS			
1.	Does the responsible official conduct weekly leak detectio	n and repair inspection?	$\boxtimes Y$	□N
2.	Which method of detection does the responsible official u	se?	$\boxtimes Y$	$\square N$
	Visual examination (condensed solvent of exterior su	rfaces)	$\boxtimes Y$	$\square N$
	Physical detection (airflow felt through gaskets)		$\boxtimes Y$	$\square N$
	Odor (noticeable perc odor)		$\boxtimes Y$	$\square N$
	Use of direct-reading instrumentation (FID/PID/calor	imetric tubes)	$\square Y$	$\boxtimes N$
	If using direct-reading instrumentation, is the equipment	0	$\square Y$	$\square N$
	a. Capable of detecting perc vapor concentrations in a	range of 0-500 ppm	$\square Y$	$\square N$
	b. Calibrated against a standard gas prior to and after	each use (PID/FID only).	$\square Y$	$\square N$
	c. Inspected for leaks and obvious signs of wear on a	weekly basis?	$\square Y$	$\square N$
	d. Kept in a clean and secure area when not in use.		$\square Y$	$\square N$
	e. Verified for accuracy by use of duplicate samples (calorimetric only)?	$\square Y$	$\square N$
3.	Has the facility maintained a leak log?		$\boxtimes Y$	$\square N$
4.	The following area should be checked for leaks by the ope	erator:	$\boxtimes Y$	$\square N$
	Hose connections, fitting couplings, and valves $\square Y \square N$	Muck cookers	$\square Y$	$\boxtimes N$
	Door gaskets and seating	Stills	$\boxtimes Y$	$\square N$
	Filter gaskets and seating	Exhaust dampers	$\boxtimes Y$	$\square N$

Shea Jackson	October 13, 2010
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector's Signature	Date of Next Inspection

 $\boxtimes Y$

 $\boxtimes Y$

 $\boxtimes Y$

 $\square N$

 $\square N$

 $\square N$

Diverter valves

Cartridge Filter housing ⊠Y

 $\square Y$

 $\boxtimes N$

 $\square N$

Pumps

Water separators

Solvent tanks and containers

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.) $\boxtimes Y \subseteq N$
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 $\S63.322(k)$ or (I). $\boxtimes Y$ $\square N$
(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? $\boxtimes Y \Box N \Box NA$
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? $\boxtimes Y \Box N \Box NA$
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? $\Box Y \Box N \Box NA$
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? $\square Y \square N \square NA$

ADDITIONAL SITE INFORMATION

Facility Name: CJ & LM Enterprises, Inc.

ARMS #: 103 0451

Inspection Comments:

- I observed the facility had changed name to Family Cleaners on outside of building and business cards. The responsible official, Mr. Cuong Van Phu was not present at this time.
- I met with the facility contact, John Phu. I asked if ownership had changed he stated no, but the name had been changed 3 months ago. I called and informed him Mr. Chong Phu would have to submit a letter to BAMM for administrative correction regarding the change of name, he stated the corporation name was to change next month.
- John Phu obtained the calendar records, from the responsible official office. Mr. Cuong Phu maintains the records for the machines. I reviewed the 2009 and 2010 recordkeeping calendars for both units 1 & 2. (black and white). They were up to date for leak and temperature checks. (See Photos)
- The temperature is recorded as 4 °C for the machines. This is below the 7.5 °C. This meets the minimum requirement.
- The Purchase invoices were stapled in the calendar. The most recent purchase invoices were with the calendar records for purchases orders on 10/10/10 for 38.60 gallons for both machines.
- The October 2010 -12 month totals were 30.0 for the (black #1) and 87.3 for the (white #2).
- The highest Perc total for No. 1 (Black) was 30.0 gallons, no Perc purchased for white machine in 2010, and No. 2 (white) total was 87.3 gallons, for a facility total of 117.3 gallons in 2010.
- I observed the dry to dry machines, the north unit Black was in wash cycle, the south unit known as white was not in operation at this time. The equipment appeared to be in good condition, and all containers were closed. (See photo).
- The Hazardous waste containers closed and sitting within the secondary containment, beside the machines (See photo)
- Mr. Phu demonstrated how he used the TIF RX 1A Halogen leak detector and checked the machine. (See photo). The detector sounded an audible beep, through out the demonstration; machines had no leaks detected during the inspection.
- The Fultan natural gas boiler, is located in the rear of building where there is a separate storage room
- I left the annual certification for signature, and requested it be mailed after signed by Mr. Cuong, I also left instructions for mailing.
- I left the Inspection summary, with instructions for making administrative correction for the name change. I also left 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	Real Star		Capacit	y	50	lbs	
Model#	Ultra plus		Serial#			Mfg yr	1999
Machine #2:							
Manufacturer	Real Star		Capacit	y	50	lbs	
Model#			Serial#			Mfg yr	1999
B. T. 4869 48 7	•44 3	• \					
•	npermitted sou	• .	£: 4: 1 41 :-	4	0		
	•	lling out the noti	•	•		□Y	⊠N
	•	ng out its own no	otification, and w	ılı ser	ia it to FDEP?	$\Box Y$	$\boxtimes N$
Record keepin	O	/1 1	:	£ 41. ·			T
=		_			emperature sensor?	$\boxtimes Y$	□N
` •		/accuracy +/- 2 ⁰	F, or 7.2EC w/ac	ccurac	y of +/- 1.1°C)		
Hazardous Wa							
1. Is all perc, contaminated wastewater either treated or disposed of properly?			$\boxtimes Y$	□N			
2. If wastewater is evaporated, is it an approved system, and using carbon filtration?				$\boxtimes Y$	$\square N$		
3. Does the facility have secondary containment for the dry-dry machine?			$\boxtimes Y$	$\square N$			
	lity have second	lary containment	for any perc. wa	iste co	ontainers?	$\boxtimes Y$	$\square N$
Boiler:							
Manufacturer	Fulton					Нр	50
Model #			Serial #			Mfg yr	2009
			_				
Fuel Type:	Natural gas?		Propane?		Fuel oil? □		
Comments:	Boiler installed	l for 2009 exemp	ot from Permittin	g			
		-		-			

1850 Main Street, Dunedin



Project Id: 75679 **Permit No:** 1030451-005-AG **Arms Number:** <u>0451</u>

Inspector: Shea Jackson **Inspection Date:** 10/13/2010

Source (EU): 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.

Description: [This is the front of the facility. The store had a new name posted over the front

of building]

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Project Id: <u>75679</u> **Permit No:** 1030451-005-AG **Arms Number:** <u>0451</u>

Inspector: Shea Jackson **Inspection Date:** 10/13/2010

Source (EU): 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.

Description: [This is the north, #1 dry to dry referred to as the black machine by facility. It was in wash cycle at the time of the inspection]

1850 Main Street, Dunedin



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Inspector: Shea Jackson **Inspection Date:** 10/13/2010

Source (EU): 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.

Description: [The #2 South machine is referred to as the white machine by the facility. It was not in operation at this time.]

1850 Main Street, Dunedin



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Inspector: Shea Jackson **Inspection Date:** 10/13/2010

Source (EU): 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.

Description: [The back area was clean and the water separator containers where closed and in secondary containment.]

1850 Main Street, Dunedin



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Inspector: Shea Jackson **Inspection Date:** 10/13/2010

Source (EU): 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.

Description: [The evaporator was also in secondary containment with the lid in place]

1850 Main Street, Dunedin



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Source (EU): New, Large Perchloroethylene Dry Cleaner: Consists of 2 1999 Realstar 473

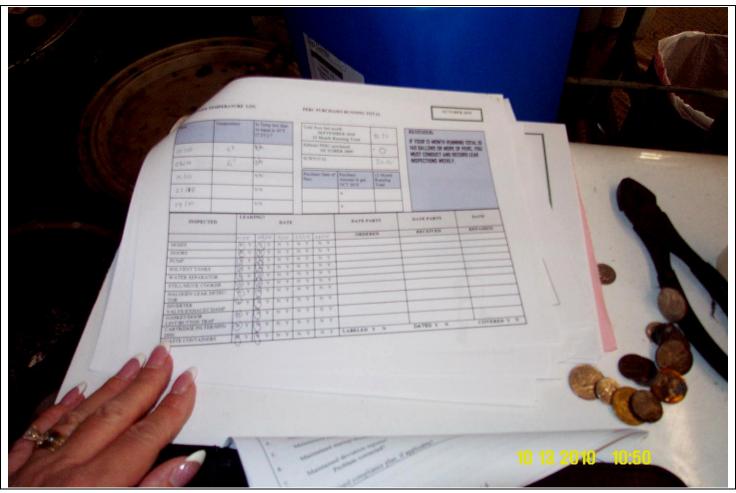
Dry-To-Dry Machines with Refrigerated Condensers. A 15 hp natural gas fired

boiler is on-site.

Description: [The hazardous waste containers were closed and located in secondary

containment.]

1850 Main Street, Dunedin



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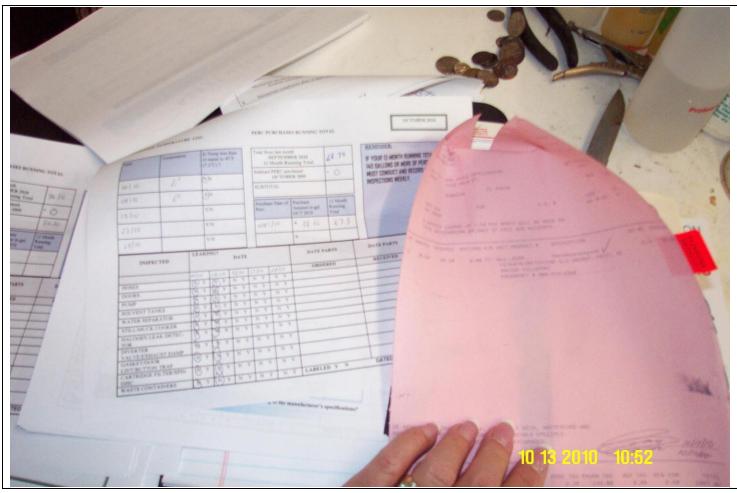
Source (EU): New, Large Perchloroethylene Dry Cleaner: Consists of 2 1999 Realstar 473

Dry-To-Dry Machines with Refrigerated Condensers. A 15 hp natural gas fired

boiler is on-site.

Description: [The records are maintained in calendar for leak and temperature checks with the Perc totals and purchase orders]

1850 Main Street, Dunedin



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Source (EU): New, Large Perchloroethylene Dry Cleaner: Consists of 2 1999 Realstar 473

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boiler is on-site.

Description: [The records are maintained in calendar for leak and temperature checks with the Perc totals and purchase orders]

1850 Main Street, Dunedin



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Inspector: Shea Jackson **Inspection Date:** 10/13/2010

Source (EU): 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.

Description: [The operator performing a leak check with the Halogen leak detector]