

PERCHLOROETHYLENE DRY CLEANERS



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#### COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)					
RE-INSPECTION (FUI) ARMS COMPLAINT NO:					
AIRS ID#:103 0451	Date: 3/18/13 Time In: 2:15	pm Time Out: 3:	05 pm		
Phu Enterprises Family Cleaners, Mr. Choung Phu informed PCAQ he had sold business to new owner. Mr. Phu was informed he needed to submit a permit rescindment letter. Received by email on 3/8/13 for permit closure. This inspection was for shutdown of 1030451-006AG permit, and observation					
Facility Location:	1850 Main Street Dunedin, FL, 34698				
<b>Responsible Official:</b>	Cuong Van Phu (Previous Owner)	Phone No:	727-734-3353		
e-mail:	cuongphu0000@yahoo.com	72	27 657- 4449		
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:	1030451-006-AG	Exp. Date:	1/19/2018		
Facility Contact:	Previous owner: Cuong Van Phu New owner: Kunj and Vinay Patel	Renewal Date:	12/20/2018		
e-mail:	kpatelfl@yahoo.com	Phone:	727-734-3353 863-245-8886		
Compliance Status:		<b>C</b> New owner operating	without Permit		

## 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	Out of business Petroleum Solvent Only					
А.						
1. Existing small area source	2. New small area source					
Dry-to-dry only, <b>x &lt;140</b> gal/yr	Dry-to-dry only, <b>x &lt;140</b> gal/yr					
Transfer only, x <200 gal/yr $\Box$	Transfer only, x <200 gal/yr $\Box$					
Both types, x <140 gal/yr	Both types, x <140 gal/yr					
(Constructed before 12/9/91)	(Constructed on or after 12/9/91)					
3. Existing large area source	4. New large area source					
Dry-to-dry only, <b>140&gt; x &lt;2,100</b> gal/yr	Dry-to-dry only, <b>140&gt; x &lt;2,100</b> gal/yr					
Transfer only, 200> x <1,800 gal/yr	Transfer only, 200> x <1,800 gal/yr $\square$					
Both types, 140> x <1,800 gal/yr	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 classification $\Box$ Y $\Box$ N $\boxtimes$ Can not determine

If no, please check the appropriate classification:

☐ Facility qualified for a general permit as number \_\_\_\_\_ 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: <u>40 in Realstar & 55 in Union</u> Gallons. Month with highest use was <u>unknown, new owner</u> <u>did not have records from 2012</u>. Did facility exceed limits □Y ⊠N <u>95 gallons new owner</u>

### 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?	$\boxtimes \mathbf{Y}$	$\Box$ N	🗆 NA			
2. Examining the containers for leakage?	$\boxtimes \mathbf{Y}$	$\Box$ N	🗆 NA			
<ol> <li>Closing and securing machine doors except during loading/unloading?</li> <li>Draining cartridge filters in their housing or in sealed containers for at</li> </ol>	⊠ Y	$\Box$ N				
least 24 hours prior to disposal?	□ Y	$\Box$ N	$\boxtimes$ NA			
5. Maintaining solvent-to-carbon ratios and steam pressure for carbon						
adsorber beds according to the manufacturer's specifications?	□ Y	□N	$\boxtimes$ 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 refriger	ated cond	enser or a o	carbon			
adsorber (complete A and B below). A Carbon adsorber must have been installed prior to Sep	tember 22	, 1993.				
If classification (4) has been checked, machine should be equipped with a refrigerated cond	enser (com	plete A and	l B			
below.)						
A. Has the responsible official of all new sources and existing large area source	es: (check	appropriate	e boxes)			
1. Equipped all machines with the appropriate vent controls? $\square$ N $\square$ NA						
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	⊠ Y	□N	□ NA			
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door?	ΩY	□N	⊠ NA			
4 Measured and recorded the temperature of the outlet exhaust stream of a refrigerated	ΜV					
condenser on a weekly basis?						
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the $\forall Y \mid \Box N \mid \Box I$						
condenser exceeded 45 <sup>°</sup> F?						
6. Conducted all temperature monitoring after an appropriate cool down period and after	$\boxtimes Y$	$\Box$ N	🗆 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?	⊠Y □N
2.	Measured and recorded the washer exhaust terr re at the condenser inlet and outlet	□Y □N □NA
	Is the temperature differential equal to $o_1$ $\sim$	□Y □N □NA
3.	Measured and recorded the concentration veekly at the end of the	
	with a carbon $\partial d^{-1} \rightarrow r^{2}$	□Y □N □NA
	Is the per in e or less the ppm?	□Y □N □NA
4.	Assured that the s 3 p on adsorber exhaust for measuring perc.	
	concentrations is at duct diamers downstream of any bend, contraction, or	
	expansion; is at least the diameters upstream from any bend contraction, or expansion; and downstream from not per inlet?	□Y □N □NA
5.	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

# PART V: RECORDKEEPING REQUIREMENTS

Has th (Check	Has the responsible official: (Check appropriate boxes)					
1.	Maintained receipts for perc purchased?	□Y □N ⊠NA				
2.	Maintained rolling monthly averages of perc consumption?	$\Box Y \boxtimes N$				
3.	<ul><li>Maintained leak detection inspection and repair reports for the following:</li><li>a. Documentation of leaks repaired w/in 24 hrs? or;</li><li>b. Documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt?</li></ul>	$ \begin{array}{c c} \Box Y & \Box N & \boxtimes NA \\ \Box Y & \Box N & \boxtimes NA \end{array} $				
4.	Maintained calibration data? (direct reading instruments only)	$\Box Y \Box N \boxtimes NA$				
5.	Maintained exhaust duct monitoring data on perc concentrations?	$\Box Y \Box N \boxtimes NA$				
6.	Maintained startup/shutdown/malfunction plan?	$\Box Y \Box N \boxtimes NA$				
7.	Maintained deviation reports? Problem corrected?	$ \begin{array}{c c} \Box Y & \Box N & \boxtimes NA \\ \Box Y & \Box N & \boxtimes NA \end{array} $				
8.	Maintained compliance plan, if applicable?	□Y □N ⊠NA				

## PART VI: LEAK DETECTION AND REPAIRS

1.	Does the responsible official conduct weekly le	ak det	ection a	nd repair inspection?	$\boxtimes \mathbf{Y}$	□N	
2.	Which method of detection does the responsible official use?						
	Visual examination (condensed solvent of	exteri	or surfac	ces)	$\boxtimes \mathbf{Y}$	□N	
	Physical detection (airflow felt through ga	skets)			$\boxtimes Y$	□N	
	Odor (noticeable perc odor)				$\boxtimes \mathbf{Y}$	□N	
	Use of direct-reading instrumentation (FII	D/PID/	calorime	etric tubes)	$\Box Y$	$\boxtimes N$	
	If using direct-reading instrumentation, is the	equip	ment:		ΠY	ΠN	
	a. Capable of detecting perc vapor concen	tration	s in a rai	nge of 0-500 ppm	ΠY	ΠN	
	b. Calibrated against a standard gas prior t	o and	after eac	h use (PID/FID only).	ΩY	ΠN	
	c. Inspected for leaks and obvious signs of	f wear	on a wee	ekly basis?	ΠY	$\Box N$	
	d. Kept in a clean and secure area when not in use.						
	e. Verified for accuracy by use of duplicat	e samp	ples (calo	primetric only)?	ΠY	ΠN	
3.	Has the facility maintained a leak log?				$\boxtimes \mathbf{Y}$	$\Box N$	
4.	The following area should be checked for leaks	s by th	e opera	tor:	$\boxtimes \mathbf{Y}$	□N	
	Hose connections, fitting couplings, and valves	$\boxtimes \mathbf{Y}$	□N	Muck cookers	$\Box Y$	□N	
	Door gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Stills	$\boxtimes \mathbf{Y}$	□N	
	Filter gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Exhaust dampers	$\boxtimes \mathbf{Y}$	□N	
	Pumps	Diverter valves	$\Box Y$	$\boxtimes N$			
	Solvent tanks and containers $\square Y \square N$ Cartridge Filter ho					□N	
	Water separators	$\boxtimes \mathbf{Y}$	□N				

Shea Jackson	3/20/13
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector's Signature	Date of Next Inspection

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### **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.)  $\boxtimes Y \quad \Box N \quad \Box NA$ 

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).  $\boxtimes$ Y  $\square$ N  $\square$ 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?  $\boxtimes Y \quad \Box N \quad \Box NA$ 

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?  $\square Y \square N \square NA$ 

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?  $\Box Y \quad \Box N \quad \boxtimes NA$ 

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?  $\boxtimes Y \quad \Box N \quad \Box NA$ 

#### ADDITIONAL SITE INFORMATION

Facility Name:	Phu Enterprises
ARMS #:	103 0451

#### **Inspection Comments:**

3/20/13- I went to perform the inspection for rescindment of permit 1030451-006AG, after the receipt of the rescindment letter from Choung Phu, of Phu Enterprises cleaners on **3/8/13**. I was met by the new owner Vinay Ravi Patel and son, Kunj Patel, they had removed one of the previous owners Choung Phu's Perc machines, Realstar RS 473, Serial # 42M8271 and kept the other perc Realstar RS 473 Serial # 42M8273, They had also installed a Union L740 U 2000 perc machine Serial # 301-17-0809 from their Palm Harbor store which had been located at A1 Cleaner 40715 US 19, for seven years.

They had installed a green machine Union HLM (non perc). The remaining Perc dry to dry Realstar RS 473 and Union L740 U 2000 machines were connected to utilities and operational. The facility had been operating the Perc machines to dry clean clothes. I observed the dry cleaned clothes in shop. They stated they had taken over store when Choung Phu left 3/8/13.

I informed both Mr. Vinay and Kunj Patels, operation of these dry cleaning Perc units without proper permit could be a violation with possible penalties. They stated they had their permit from the Palm Harbor store for the Union Machine, and the permit for the Real Star was still under the Phu Enterprize permit. I informed them the permits were not transferable when ownership and machine locations were changed. I advised them that the requirement was to register for a permit 30 days prior to operation of dry to dry machines.

Note; the Patel owners have not been able to supply a Airs general permit number for the A1 Discount dry cleaning store or their union machine to the date of this report. There was no permit found in the data bases for the address given in Palm Harbor, where this perc Union machine was said to have been located. Mr. Kunj Patel stated the union machine was operated at the previous A1 Discount Cleaners in Palm Harbors by Shilpa Patel, he did not know of or have an Air Operations Permit number for it, because they had taken over that location in 2012, He stated they had not purchased any additional Perc for machine, and stated it had only been filled with 15 gallons for the year.

Mr. Kunj Patel stated they took over the business "Family Cleaners" when previous owner Choung Phu left on 3/8/13. Mr. Kunj Patel they were in the process of moving in all their equipment from the other location, and the Perc machines had been installed on Saturday 3/16/13, stated they were closed Sunday I observed the machines were connected to utilities and operational. They had Perc waste in one full waste drum. It was located beside the secondary containment. I advised them to place in the secondary containment tray. Mr. Patel stated he was bringing his other secondary containment vessels from his A1 Discount Cleaner store. I informed him he should use the one he had until that is available for use.

I asked to see the Perc records and maintenance leak and temperature check calendars for both Perc machines. They had the calendar for one of the Realstar machines. It had no Perc totals, but showed the entries for performing maintenance and temperature and leak checks. The temperature was indicated on the Real star calendar to be observed at 4 degrees celsius. I informed them they needed to keep the Perc totals for the amount used in the machines. They stated they had purchased and put 15 gallons in the Union machine when at previous site. They did not have the records or a calendar for the Union machine. They did not have purchase orders on site. Mr. Patel stated the other paperwork and records were still at Palm Harbor store. Later he stated he had located calendars for Union machine for 2009, 2011 & 2012. I asked him to bring those copies to the new location. Additional information he gave was for facility id # 9811135, Certificate # 4828 FL DEP Registration. He stated the other store in Palm Harbor had been inspected by L Powel, and SQW inspector Iness Torres, I informed him they were not inspectors associated with the Pinellas County Air Quality Division.

3/26/13 I called Mr. Kunj Patel and inquired about the Perc left in the machines, he stated the Real Star which was disconnected, he thinks was used to fill the Union Machine, and the other Real Star still had Perc from previous ownership. This was later confirmed. He sent an email on 3/27/13 and stating the Perc was removed from the old Real Star and filled Union which now contains a total of <u>55 gallons</u> of Perc. The Perc remaining in the other Real Star is a total of <u>40 gallons</u> of Perc

During the inspection, Mr. Kunj Patel demonstrated the Halogen leak detector was working and performed leak checks on machines. The halogen detector was used at rear of Union machine and detection alarm sounded. The leak area could not be pin pointed at a connection area from which it was occurring. There were no Perc odors detectable. I informed them that in the process of installing the machine, a connection could have become loose and needs tightening, or machine has spill on machine pipe surface, they need to recheck, have the installer recheck and make sure there are no leaks occurring.

3/26/13 Mr. Kunj Patel when I called and inquired about the possible leak he stated he had rechecked when operating a cycle, and there were no more leak alarms detected around the union machine

The previous Permit 1030451\_006 AG had been rescinded by Mr. Choung Phu and was not transferable to new owner. During the inspection I informed them they needed to register for a Air General Permit. Mr. Kunj Patel had his PC operational, so I guided him to the FDEP site, and registration form. I showed him the worksheet to start the process for applying for permit on line, and showed him location of the 2013 record calendar he could download from site. I told Mr. Patel they would most likely be issued a new number 1030451\_007AG

3/21/12- Mr. Kung Patel emailed a copy of his new permit 1030451\_007AG status pending activation from FDEP.(See Attached)

#### ADDITIONAL SITE INFORMATION

<b>Facility Name:</b>	Phu Enterprises	Changed to Family Cleaners new owner Patel	
ARMS #:	103 0451		
Machine #1:			
Manufacturer	Realstar	Capacity Lbs ~5:	5lbs
Model#	RS 473	Serial#42.M8 Mfg yr 273	1999
Machine #2:			
Manufacturer	Union	Capacity lbs	
Model#	L740 U 2000	Serial#301- Mfg yr 17-0809	2007
Notification (ur	permitted sources	only):	
1. Was the facili	ty assisted in filling	out the notification by the inspector? $\square Y$	□N
2. Did the facilit	y insist on filling ou	t its own notification, and will send it to FDEP? $\square Y$	□N
<b>Record keeping</b>	5:		
1. Does facility I (Temper	have statement/specs ature of 45 <sup>0</sup> F w/accu	as to the design accuracy of the temperature sensor? $\Box Y$ racy +/- 2 <sup>0</sup> F, or 7.2EC w/accuracy of +/- 1.1 <sup>0</sup> C)	□N
Hazardous Was	ste:		
1. Is all perc. con	ntaminated wastewat	ter either treated or disposed of properly? $\square Y$	□N
2. If wastewater	is evaporated, is it a	n approved system, and using carbon filtration? $\square Y$	□N
3. Does the facil	ity have secondary c	ontainment for the dry-dry machine? $\square Y$	□N

3. Does the facility have secondary containment for the dry-dry machine?	$\boxtimes \mathbf{Y}$
4. Does the facility have secondary containment for any perc. waste containers?	$\boxtimes \mathbf{Y}$
Comment: The containment was on site, drums sitting beside the containment holder. The	
facility owners were advised to put full Perc waste containers in the secondary	
containment.	

**Boiler:** 

Boller:						
Manufacturer	Fulton				Hp 25	
Model #			Serial #		Mfg yr	2009
Fuel Type:	Natural gas?		Propane?	Fuel oil?		
<b>Comments:</b>	Same Boiler ex	empt from permi	itting			

 $\Box N$ 

### **ENFORCEMENT SUMMARY**

Facility Name:Phu EnterprisesARMS #:103 0451

Viol#	Violation Description	Frequency	From	То
per00	Failure to notify and obtain a permit		3/8/13	3/20/13
per01	No purchase records on site	Monthly	3/8/13	3/20/13
per02	No perc. purchase rolling totals	Monthly	3/8/13	3/20/13
per03	No leak log for Union machine	🛛 Weekly 🔲 Bi-weekly	3/16/13	3/20/13
per04	No temp. log for Union machine	Weekly	3/16/13	3/20/13
per05	No SSM plan			
per06	Temp. sensor accuracy verification			
per07	No leak checks	🗌 Weekly 🔲 Bi-weekly		
per08	No temp. checks	Weekly		
per09	Perceptible leaks		3/16/13	3/20/13
per10	No carbon absorber			
per11	No carbon absorber test	Weekly		
per12	No leak tight containers			
per13	No separator pre-filter			
per14	Leaks not repaired within 24hrs.			
per15	Repair refrig. cond./carbon abs. within 2 days			

Viol#	Comments
per00 01,02	3/8/13 – new ownership took over the main street location when the previous owner Choung Phu vacated store
per03 ,04 , 09	3/16/13 Machines installed

1850 Main Street, Dunedin





Photograph 1		aph 1	Photograph 2		
Description: Front of DISCONNECTED REAL STAR STILL ON PROPERTY			Description: Rear side of DISCONNECTED REAL STAR STILL ON PROPERTY		
Project Id:	86253	Permit No: 1030451-007	AG	<b>Arms Number:</b> <u>0451</u>	
Inspector:	Shea Jackson		Inspe	ection Date / Time: <u>3/20/2013</u>	
Source (EU):	<u>New, Large P</u>	erchloroethylene Dry Cleaner: C	Consists of One 19	999 Realstar Model 473 and one	
	Union Dry-	To-Dry Machines with Refriger	ated Condensers.	Two 20 hp natural gas fired boilers	
	are on-site.				

**Description:** [Real Star Ultra RS 473 serial Number 42.M8271 which had been disconnected and moved for the placement of the Union L740]

1850 Main Street, Dunedin





Photograph 1		Photograph 2		
Description: machine	Front side of Uni	ion L740 Perc dry to dry	Description: F 473	ront side of Remaining REAL STAR
Project Id:	86253	Permit No: 1030451-007-	AG	<b>Arms Number:</b> <u>0451</u>
Inspector:	Shea Jackson		Ins	pection Date / Time: <u>3/20/2013</u>
Source (EU): New, Large Perchloroethylene Dry Cleaner: Consists of One 1999 Realstar Model 473 and one				
	Union Dry-7	To-Dry Machines with Refriger	ated Condenser	s. Two 20 hp natural gas fired boilers
	are on-site.			

**Description:** [Real Star Ultra RS 473 and Union L740 dry to dry machines were connected to utilities, power lights on and the units were operational]

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**Description:** [Facility contact Kunj Patel using the Halogen detector for leak inspection of the Union dry to dry machine. ]

1850 Main Street, Dunedin





Photograph 1			Photograph 2		
Description: Rear side of Real Star 473 Perc dry to dry machine			Description: Rear side of Union L740 Perc dry to dry machine area the leak alarm sounded		
Project Id:	<u>86253</u>	Permit No: 1030451-007	7-AG Arms Number: <u>0451</u>		
Inspector:	Shea Jackson		Inspection Date / Time: <u>3/20/2013</u>		
Source (EU):	<u>New, Large P</u>	erchloroethylene Dry Cleaner:	: Consists of One 1999 Realstar Model 473 and one		
	Union Dry-	To-Dry Machines with Refrige	erated Condensers. Two 20 hp natural gas fired boilers		
	are on-site.				

**Description:** [Facility contact Kunj Patel using the Halogen detector for leak inspection of the Union dry to dry machine. ]

1850 Main Street, Dunedin



Source (EU): New, Large Perchloroethylene Dry Cleaner: Consists of One 1999 Realstar Model 473 and one Union Dry-To-Dry Machines with Refrigerated Condensers. Two 20 hp natural gas fired boilers

<u>are on-site.</u>

**Description:** [Facility contact Kunj Patel had 2013 calendar for Realstar machine, There were no Perc totals recorded]