



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: 10/24/13 Time In: 12:50 Time Out: 1:20PM		
Facility Name:	A1 Cleaners LLC		
Facility Location:	1850 Main Street Dunedin, FL, 34698		
Responsible Official:	Vinay Patel	Phone No:	727-734-3353
e-mail:	kpatelfl@yahoo.com		
Emis. Unit Description:	New, Large Perchloroethylene Dry Cleaner: Consists of One 1999 Realstar Model 473, Serial# 42M8.273 and one 2007 Union, , Model #L740, Serial# 301-17-0809 Dry-To-Dry Machines with Refrigerated Condensers. Two 20 hp natural gas fired boilers are on-site.		
Permit Number:	1030451-007-AG	Exp. Date:	4/21/2018
Facility Contact:	Vinay Patel	Renewal Date:	3/22/2018
e-mail:	kpatelfl@yahoo.com	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.**
- | | |
|---|--|
| <p><u>1. Existing small area source</u>
 Dry-to-dry only, x <140 gal/yr
 Transfer only, x <200 gal/yr <input type="checkbox"/>
 Both types, x <140 gal/yr
 (Constructed before 12/9/91)</p> <p><u>3. Existing large area source</u>
 Dry-to-dry only, 140> x <2,100 gal/yr
 Transfer only, 200> x <1,800 gal/yr <input type="checkbox"/>
 Both types, 140> x <1,800 gal/yr
 (Constructed before 12/9/91)</p> | <p><u>2. New small area source</u>
 Dry-to-dry only, x <140 gal/yr
 Transfer only, x <200 gal/yr <input type="checkbox"/>
 Both types, x <140 gal/yr
 (Constructed on or after 12/9/91)</p> <p><u>4. New large area source</u>
 Dry-to-dry only, 140> x <2,100 gal/yr
 Transfer only, 200> x <1,800 gal/yr <input checked="" type="checkbox"/>
 Both types, 140> x <1,800 gal/yr
 (Constructed on or after 12/9/91)</p> |
|---|--|

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 ___ 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: 33 Gallons. Month with highest use was September 2013. Did facility exceed limits Y 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? | <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 | <input type="checkbox"/> NA |
| 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 checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input 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 | <input type="checkbox"/> NA |
| 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45 ^o 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 | <input type="checkbox"/> NA |

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 type="checkbox"/> Y <input checked="" 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 greater 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 position 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 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"/> Y	<input type="checkbox"/> N			
Physical detection (airflow felt through gaskets)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Odor (noticeable perc odor)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N			
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 type="checkbox"/> Y	<input type="checkbox"/> N			
d. Kept in a clean and secure area when not in use.	<input 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 operator:	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			
Hose connections, fitting couplings, and valves	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Muck cookers	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Door gaskets and seating	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Stills	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Filter gaskets and seating	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Exhaust dampers	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Pumps	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Diverter valves	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Solvent tanks and containers	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Cartridge Filter housing	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Water separators	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N			

Shea Jackson	10/24/13
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector's Signature	Date of Next Inspection
	2014

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:	A1 Cleaners LLC
ARMS #:	103 0451

Inspection Comments:

- I was met by the new owner Vinay Ravi Patel, the R.O. and facility contact.
- I observed the Perc machines, Realstar RS 473 Serial # 42M8273, and a Union L740 U 2000 perc machine Serial # 301-17-0809 The facility also has a green machine Union HLM (non perc).
- Mr. Vinay Patel is performing checks and maintaining a calendar record for the Union and Realstar Perc machines. I reviewed the records are now being kept in the Phoenix Perc calendar for the maintenance, leak and temperature checks. The temperature check was circled Y as yes for observed to be below 45F or 7C, but the actual temperatures had not been indicated in the records for the Union or RealStar dry to dry machines for 2013. This is failure to record the actual Temperature for the machines to demonstrate is operating below 45F or 7C the minimum temperature requirement. Mr. Vinay Patel stated he was aware the temperature was to be below these temperatures and was checking operating properly, but did not realize the condenser column on the record Phoenix calendar record sheet was where he should put the temperature he observed. He indicated he was observing the digital temperature display on front of machine. I informed him he should be looking at the temperature gauge at the rear of the machines, adjacent to the condenser. I informed him that the intent of the recording of the actual temperature is so that the operator would be alerted to a possible leak or problem during the cool down cycle and realize a repair should be made.
- I told him from this date forward to check the temperature gauge at rear of machine and start putting the actual temperature he observed during the cool down cycle on the calendar.
- The facility did not have any purchase invoices for 2013. The facility had the Perc from the facility Real Star that had been removed from site last year. There was 33 gallons put in the remaining realstar and 33 gallons in the Union. The current Perc totals for both machines was 33 gallons.
- The Hazardous waste containers were closed and sitting within the secondary containment tray, behind the machines. The most recent Hazardous waste disposal was 6/27/13 for 8 drums at 780 lbs.
- I advised him that failure to record the actual temperature of the condenser could be a violation of the permit and could result in a warning letter and penalty.
- I left copy of the Inspection summary with Mr. Patel restating need to record temperature. This source appears have a record minor compliance issue at this time.

*Discussion with A.Q. Program Manager advises we need to inform the Responsible official of requirements, and that this is a verbal warning. I Informed Mr. Patel he should be recording the actual temperature onto the record calendar, from this date forward. Advised he should check and record the temperature from the temperature gauge at the rear of machine, which indicates the condenser temperature. I told him I would be returning to observe the machine in operation and the cool down cycle to assure the temperatures on machines are acceptable and record keeping corrections. (see email)

ADDITIONAL SITE INFORMATION

Facility Name:	Phu Enterprises Changed to Family Cleaners new owner Patel
ARMS #:	103 0451

Machine #1:			
Manufacturer	Realstar	Capacity	Lbs ~55lbs
Model#	RS 473	Serial#42M8 273	Mfg yr 1999

Machine #2:			
Manufacturer	Union	Capacity	lbs
Model#	L740 U 2000	Serial#301- 17-0809	Mfg yr 2007

Notification (unpermitted sources only):

- 1. Was the facility assisted in filling out the notification by the inspector? Y N
- 2. Did the facility insist on filling out its own notification, and will send it to FDEP? Y N

Record keeping :

- 1. Does facility have statement/specs as to the design accuracy of the temperature sensor? Y N
(Temperature of 45⁰F w/accuracy +/- 2⁰F, or 7.2EC w/accuracy of +/- 1.1⁰C)

Hazardous Waste:

- 1. Is all perc. contaminated wastewater either treated or disposed of properly? Y N
- 2. If wastewater is evaporated, is it an approved system, and using carbon filtration? Y N
- 3. Does the facility have secondary containment for the dry-dry machine? Y N
- 4. Does the facility have secondary containment for any perc. waste containers? Y N

Comment: *The containment was on site, drums sitting inside the containment holder. (See photo)*

Boiler:

Manufacturer	Fulton	Hp	25
Model #		Serial #	Mfg yr 2009

Fuel Type: Natural gas? Propane? Fuel oil?

Comments: Same Boiler exempt from permitting

LLC Family Cleaners

1850 Main Street, Dunedin



Project Id: 88164 **Permit No:** 1030451-007-AG **Arms Number:** 0451

Inspector: Shea Jackson **Inspection Date / Time:** 10/24/2013 / _____

Source (EU): New, Large Perchloroethylene Dry Cleaner: Consists of One 1999 Realstar Model 473, Serial# 42M8.273 and one 2007 Union, , Model #L740, Serial# 301-17-0809 Dry-To-Dry Machines with Refrigerated Condensers. Two 20 hp natural gas fired boilers are on-site.

Description: [The white machines are Union and Real Star Perc machines. They were not in operation at time of inspection.]

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A1 Cleaners LLC Family Cleaners

1850 Main Street, Dunedin



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Inspector: Shea Jackson **Inspection Date / Time:** 10/24/2013 / _____

Source (EU): New, Large Perchloroethylene Dry Cleaner: Consists of One 1999 Realstar Model 473, Serial# 42M8.273 and one 2007 Union, , Model #L740, Serial# 301-17-0809 Dry-To-Dry Machines with Refrigerated Condensers. Two 20 hp natural gas fired boilers are on-site.

Description: The containers behind the machine were closed and no Perc odors detected] The waste drums are located in the secondary containment.

A1 Cleaners LLC Family Cleaners

1850 Main Street, Dunedin



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Source (EU): New, Large Perchloroethylene Dry Cleaner: Consists of One 1999 Realstar Model 473, Serial# 42M8.273 and one 2007 Union, , Model #L740, Serial# 301-17-0809 Dry-To-Dry Machines with Refrigerated Condensers. Two 20 hp natural gas fired boilers are on-site.

Description: [The Union record for 2013 did not have the actual observed temperature recorded. The facility contact had been checking off the column that states the temperature was below 45f or 7.2C]

A1 Cleaners LLC Family Cleaners

1850 Main Street, Dunedin



Project Id: 88164 **Permit No:** 1030451-007-AG **Arms Number:** 0451

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Description: [The Realstar record for 2013 did not have the actual observed temperature recorded. The facility contact had been checking off the column that states the temperature was below 45f or 7.2C]