

PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2)	COMPLAINT/DISCOVERY (CI)	
RE-INSPECTION (FUI)	ARMS COMPLAINT NO:	
AIRS ID#: 1030459 DATE: <u>10/11/2007</u>	ARRIVE: <u>10:45AM</u> DEPART: <u>11:30AM</u>	
FACILITY NAME: HI TECH CLEANERS		
FACILITY LOCATION: 5523 Roosevelt Blvd		
CLEARWATER 33760-3	3425	
RESPONSIBLE OFFICIAL: TAEK MA	PHONE: (727)536-1288	
CONTACT NAME: SAME	PHONE: (
REMITTANCE YEAR: 2006 ENTITLES	MENT PERIOD: 7/18/2004 / 7/18/2009 (effective date) (end date)	
PART I: INSPECTION COMPLIANCE STATUS (chec	I. ☑ only one hor)	
IN COMPLIANCE MINOR Non-COMPL	·	
IN COMPLIANCE MINOR NON-COMPL	IANCE SIGNIFICANT NOIF-COMPLIANCE	
	200 71 9	
PART II: FACILITY CLASSIFICATION - Rule 62-213 (check only one box in A)	.300 FAC	
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)	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)	
3. Existing large area source dry-to-dry only, $140 \le x \le 2{,}100$ gal/yr transfer only, $200 \le x \le 1{,}800$ gal/yr both types, $140 \le x \le 1{,}800$ gal/yr (constructed before $12/9/91$)	4. New large area source dry-to-dry only, $140 \le x \le 2,100$ gal/yr transfer only, $200 \le x \le 1,800$ gal/yr both types, $140 \le x \le 1,800$ gal/yr (constructed on or after $12/9/91$)	
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 265 gallons.		

PA	PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC (check ☑ only one box				
Does the responsible official of the dry cleaning facility:		for each question)			
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			
	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.14. Classification: page 1 of 4, this form)				
	1. If the facility classification is a Existing small area source, no controls are requi	ired. Proceed to Part V.			
	2. If the facility classification is a <u>New small area source</u> , 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 refrigerated condenser or a carbon adsorber. Complete both sections A and B below <i>must have been installed prior to September 22, 1993</i>				
	4. If the facility classification is a <u>New large area source</u> , the machine should be excondenser. Complete both sections A and B below.	quipped with a refrigerated			
A.	Has the responsible official of all <u>existing large</u> <u>area & new sources</u> :	(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			

PA	PART IV: PROCESS VENT CONTROLS - Rule 62-213.300 FAC (continued)				
В.	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 $20^{\rm o}F?$	☐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				
٥.	condenser coils?	- Yes No N/A			
6.	Route airflow to the carbon adsorber (if used) at all times?	☐Yes ☐ No ☒ N/A			
PA	PART V: <u>RECORDKEEPING</u> <u>REQUIREMENTS</u> – Rule 62-213.300(3) FAC (check ✓ only one box for				
Do	oes the responsible official:	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 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.					
5	Maintain calibration data? (for applicable direct reading instruments)	☐ Yes ☐ No ☒ N/A			
٦.	Maintain calibration data? (for applicable direct reading instruments) Maintain exhaust duct monitoring data on perc concentrations?	<u> </u>			
		☐ Yes ☐ No N/A			
6.	Maintain exhaust duct monitoring data on perc concentrations?	☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No			
6.	Maintain exhaust duct monitoring data on perc concentrations? Maintain a startup/shutdown/malfunction plan?	 Yes □ No ⋈ N/A Yes □ No Yes □ No ⋈ N/A 			

PART VI: <u>LEAK DETECTION AND REPAIRS</u> – Rule 62-213.300 FAC

1. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak

(check ☑ only one box for each question)

	detection and repair inspection? Yes No	
2	Does the facility maintain a leak log? Yes No	
	Does the responsible official check the following areas for leaks? a) Hose connections, fittings, couplings, and valves	
4.	Which method(s) of detection (is/are) used by the responsible official? a) Visual examination (condensed solvent on exterior surfaces)	
	d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	
**If using direct-reading instrumentation, is the equipment:		
SF	EA JACKSON 10/11/2007	
	Inspector's Name (Please Print) Date of Inspection	
	2008	
	Inspector's Signature Approximate Date of Next Inspection	

COMMENTS:

- I performed an annual compliance inspection of this facility, and met with the responsible official, Mr. Taek Ma. Mr. Ma informed me, he had purchased and installed a new machine.
- I observed the dryer, a Multi Matic L 40, Serial Number # 40SL-R1-0807-7572, the dry to dry cleaner was not in operation at this time. I asked Mr. Ma if he had informed the FDEP or our department of new machine. I informed him we were not aware of the new machine. He stated he believed the mfg or installer had contacted them. I informed him this was not likely. I asked when he had purchased. He was not sure of the date. I asked if he could show me the purchase invoice. He did not have a purchase invoice.
- I reviewed the 2006 and 2007 calendar records, with Mr. Taek Ma. He is making weekly temperature and dryer observation entries for the required weekly observations. The records were up to date. The weekly cool down temperature checks were noted in the September calendar as consistently $20^{\circ}F$. The temperatures for June August were still ranging from $35 39^{\circ}F$. The second week of August 8/10/2007 entries for the weekly check was $20^{\circ}F$ and through the rest of the month. Mr. Ma stated the installer had informed him that the optimum temperature for machine operation Cool down cycle was to maintain 20° . He was not sure if F° or C° . I reviewed the operations manual. I could not locate information which referred to the optimum temperatures for dry to dry operations. The temperature is observed from the control panel at the left front of the machine. Mr. Ma stated he also checks the thermometer on the back in the left corner to the side of the condenser. I observed there were two gauges which showed temperatures. They were in tight quarters, and small print was not easily readable. (manufacturer stated this is temp for Perc distillation only not solvent temperature)
- There was also a temperature gauge under the condenser coil area. This gauge had a set point red needle (manufacturer stated this is temp for separator water not the solvent temperature)
- I observed around the dryer, and the associated equipment, and the Fulton 15 HP boiler.
- All receptacles and containers were closed. The Hazardous waste drums were in secondary containment. Mr. Ma showed how he can now operate the still, and it automatically dispenses waste through hose to the Haz waste receptacle. (See photo) The waste is picked up by Saftey Kleen, and MCF performs maintenance.

- He also showed how the evaporator is directly connected to the dry to dry, so the water goes directly into the evaporator. (see Photo)
- There were no Perchloroethylene odors detected during the observations of the facility. The Halogen detector as used did not register a Perc leak.
- I reviewed the perchloroethylene purchase and waste manifest receipts and 12/2/2006 was most recent copy, for waste disposal. I could not locate a equipment removal invoice for the old Donni Dry to Dry Machine.
- The invoices are kept with the calendar records. The most recent purchase for Perchloroethylene on 6/20/2007 was 20 gallons.
- The Highest perchloroethylene consecutive total for month (August and September) was 265 gallons. Mr. Ma stated they had drained the old machine into his new dry to dry.
- I obtained signature on annual certification, which stated discrepancy due to failure to notify department of equipment change. I informed Mr. Taek, I would let him know what we need to do to in regards to notification to Departments. I informed him a warning letter was possible.

10/15/2007 – I called 404-409-7094 and spoke to Mr. Chris Waan manufacturer contact for the 40L Multi Matic. He stated that the front panel was measuring the Fahrenheit, and he stated a probe to machine detects the temperature during the cool down at the condenser. He stated that one of the temperature gauges on the back next to the condenser is measuring and controlling the separator water temperature, which will shut the machine off if goes above 60°F. The other two gauges to the left of the condenser are for the measuring of the Perc temperature during the distilling process. He stated the only place the cool down cycle temperature could be monitored by the operator was on the front panel. I asked him if he had notified FDEP of the installation of the dry to dry. He stated he did not contact the department.