

PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2)

RE-INSPECTION (FUI)

COMPLAINT/DISCOVERY (CI)

ARMS COMPLAINT NO:

AIRS ID#:	Date:	10/27/200	8 Time In:	1:20PM	Time Out:	2:00PM
103 0459						
Facility Name:	Hi Tech	Cleaners & I	Laundry, Inc.			
Facility Location:	5523 Ro	osevelt Blvd	•			
	Clearwa	ter, FL, 3376	60			
Responsible Official:	In Taek	Ma		Phone No:	727-536-1	288
Emis. Unit Description:	Existing machine	0	Matic L40, Ser	ial No. 40SL-R	i-0807-7572 D	ry-to-dry
Permit Number:	1030459	9-002-AG		Exp. Date:	7/18/09	
Facility Contact:	In Taek	Ma		Phone:	727-536-1	288
Compliance Status:		MNC M				

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:			
\Box No Notification Form \Box Drop-Off Store	e □ (Out of business	□ Petroleum Solvent On	ly
A.				
1. Existing small area source		2. New small a	rea source	
Dry-to-dry only, x < 140 gal/yr		Dry-to-dry only	∕, x <140 gal/yr	
Transfer only, x <200 gal/yr		Transfer only, y	x <200 gal/yr	
Both types, x <140 gal/yr		Both types, $x <$	140 gal/yr	
(Constructed before 12/9/91)		(Constructed or	n or after 12/9/91)	
3. Existing large area source		4. New large a	rea source	
Dry-to-dry only, 140> x <2,100 gal/yr		Dry-to-dry only	/, 140> x <2,100 gal/yr	
Transfer only, 200> x <1,800 gal/yr	\boxtimes	Transfer only, 2	200> x <1,800 gal/yr	
Both types, 140> x <1,800 gal/yr		Both types, 140)> x <1,800 gal/yr	
(Constructed before 12/9/91)		(Constructed or	n or after 12/9/91)	
This is a correct facility classification If no, please check the appropriate class	Y 🔲	—	determine	
☐ facility qualified for a general permit a			above.	
\Box facility exceeds above limits and is not			-	
B. Highest 12-month consecutive total of perc	0	U 1		h
		• •	in records as of 12/31/200	

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?	⊠Y	\Box N	□ NA
2. Examining the containers for leakage?	$\boxtimes \mathbf{Y}$	\Box N	□ NA
3. Closing and securing machine doors except during loading/unloading?4. Draining cartridge filters in their housing or in sealed containers for at	⊠Y	□N	
least 24 hours prior to disposal?	⊠Y	\square N	\Box NA
5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications?	□ Y	□N	🛛 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?	×Υ	\Box N	
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	⊠Y	\Box N	□ NA
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door?	ΠY	□N	⊠NA
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis?	ΠY	N	
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 450 F?	ΩY	□N	⊠NA
6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged?	⊠Y	□ N	

В.	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. <i>Mr. Taek Ma stated he was checking the temperature weekly and was ranging 20 degrees and lower sometimes 19 degrees F. But he did not make a record of temperature from 1/1/2008 – 10/27 2008.</i>	ΓY	
2.	Measured and recorded the washer exhaust temperature at the condenser inlet and outlet	ΠY	\Box N \boxtimes NA
	weekly? Is the temperature differential equal to or greater than 20° F? (Transfer Washer Machine only)	ΠY	□N ⊠NA
3.	Measured and recorded 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 with a carbon adsorber? Is the perc concentration equal to or less than 100 ppm?	ΠY	□n ⊠na
4.	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?	ΠY	□n ⊠na
5.	Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?	ΠY	□N ⊠NA
6.	Routed airflow to the carbon adsorber (if used) at all times?	ΠY	□N ⊠NA
		□ Y	□N ⊠NA
PA	RT V: RECORDKEEPING REQUIREMENTS		
	s the responsible official: neck appropriate boxes)		
1.	Maintained receipts for perc purchased?	⊠Y	□N
2.	Maintained rolling monthly averages of perc consumption?	ΠY	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?	□Y □Y	$ \square N \boxtimes NA \\ \square N \boxtimes NA $

		ΠY	□N	⊠NA
4.	Maintained calibration data? (direct reading instruments only)	—		
5.	Maintained exhaust duct monitoring data on perc concentrations?	ĽΥ	ΠN	⊠NA
5.	mannande enhaust duet montoring and on pere concentrations.	×Υ	□N	
6.	Maintained startup/shutdown/malfunction plan?			
7.	Maintained deviation reports?	⊡ Y □Y		⊠NA ⊠NA
	Problem corrected?	ΠY	□N	⊠NA
8.	Maintained compliance plan, if applicable?			

PART VI: LEAK DETECTION AND REPAIRS

1.	Does the responsible official conduct a weekly	leak d	etection	and repair inspection?	ΠY	$\Box N$
2.	Which method of detection does the responsible	le offic	cial use?		$\boxtimes \mathbf{Y}$	$\Box N$
	Visual examination (condensed solvent of	fexteri	or surfac	es)	\boxtimes	
	Physical detection (airflow felt through ga	skets)			\boxtimes	
	Odor (noticeable perc odor)				\boxtimes	
	Halogen detector usage $$ - TIF 5050A Halog	gen Det	ector.		$\boxtimes \mathbf{Y}$	
	Use of direct-reading instrumentation (FII	D/PID/	calorime	tric tubes)	$\boxtimes \mathbf{Y}$	
	If using direct-reading instrumentation, is the	equip	ment:		$\Box Y$	□N
	a. Capable of detecting perc vapor concen	tration	s in a rai	nge of 0-500 ppm	$\Box Y$	□N
	b. Calibrated against a standard gas prior to and after each use (PID/FID only).					$\Box N$
	c. Inspected for leaks and obvious signs of wear on a weekly basis?					□N
d. Kept in a clean and secure area when not in use.					$\Box Y$	□N
e. Verified for accuracy by use of duplicate samples (calorimetric only)?					$\Box Y$	$\Box N$
3.	Has the facility maintained a leak log?				$\Box Y$	$\boxtimes N$
4.	The following area should be checked for leak	s by th	e inspec	tor:	$\boxtimes \mathbf{Y}$	□N
	Hose connections, fitting couplings, and valves	$\boxtimes \mathbf{Y}$	$\Box N$	Muck cookers	$\Box Y$	$\boxtimes N$
	Door gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Stills	$\boxtimes \mathbf{Y}$	□N
	Filter gaskets and seating	$\boxtimes \mathbf{Y}$	$\Box N$	Exhaust dampers	$\boxtimes \mathbf{Y}$	□N
	Pumps	$\boxtimes \mathbf{Y}$	□N	Diverter valves	ΠY	$\boxtimes N$
	Solvent tanks and containers	$\boxtimes \mathbf{Y}$	□N	Cartridge Filter housing	$\boxtimes \mathbf{Y}$	□N
	Water separators	$\boxtimes \mathbf{Y}$	□N			

Shea Jackson	10/27/2008
Inspector=s Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector=s Signature	Date of Next Inspection

ADDITIONAL SITE INFORMATION

Facility Name:	Hi Tech Cleaners & Laundry, Inc.
ARMS #:	103 0459

- I performed an annual compliance inspection of this facility, and met with the responsible official, Mr. Taek Ma, and his wife and Mrs. Ma.
- I reviewed the 2007 calendar records, with them. <u>They did not have the calendar records for</u> <u>2008</u>. She stated she had not received the calendar. I informed them that I had spoken to them last year about the calendar would no longer be issued and would need to record in their own calendar, or down load from the DEP internet site. <u>The last record of Temperature, leak</u> <u>checks and Perc usage were recorded for the last week of December 2007.</u>
- I gave Mr. And Mrs. Ma the handouts for the web site for the calendar. Mrs. Ma stated she had tried to go on the computer and download the calendar for 2008, and had problems. I told her she should have contacted our department or could have kept a blank check off list from her 2007 to use with a regular calendar. I explained they could go to Fed Ex and get copy of calendar made there. I gave them the Fed Ex handout and circled the nearest location to their shop off Ulmerton.
- I asked if there had been any maintenance issues or equipment breakdowns, Mr. Ma stated that they had no problem because is new machine.
- They were able to show one Purchase order #6838 invoice for Perc on 3/12/2008 for the purchase of 10 gallons. Mrs. Taek Ma stated she had ordered a Perc purchase for this Wednesday of another 10 gallons for 10/29/2008. Mr. Ma stated the previous machine had been drained into his new dry to dry, when they purchased the new machine in 2006. He stated that is why they had not had to purchase much Perc this year or last. They also stated the business had been very slow. I informed Mr. and Mrs. Ma, they had to keep the purchases recorded in the monthly records and subtract out the 2007 perc purchases in order to be able to determine what the usage amount is for the rolling 12 month total.
- I asked if they had purchased the new detector as required. He showed the Model TIF 5050A Halogen Detector. The device states it meets the SSAE J1627 for R134a R12 and R 22. US Patent # 32522428252. It also had directions on side of device, which states turn on, and alarm will sound when a leak is detected. The detector has a steady beep when in use. Mr. Ma stated that no operations manual had come with it. He stated it had cost about \$200.00. I walked and observed around the dry to dry, with Mr. Taek as he used his Halogen detector, and demonstrated how he checked the machine for leaks. (See photos)
- There were no Perchloroethylene odors detected during the observations of the facility.
- All receptacles and containers were closed. The Hazardous waste drum is connected directly to the machine for draining, and was located in secondary containment.
- <u>I informed Mr. Taek of the violations, and that a warning letter was possible with penalties for</u> <u>failure to maintain the records for weekly leaks and temperature checks, and the monthly Perc</u> <u>usage totals from January 2008 – October 2008.</u> I obtained Mr. Taek signature on annual certification, which stated these compliance discrepancies of the general permit conditions.

ADDITIONAL SITE INFORMATION

Facility Name	: Hi Tech Cl	eaners & Laundr	y, Inc.				
ARMS #:	103 0459						
Machine #1:	Multi Matic						
Manufacturer			Cap	acity		lbs	
Model#	L-40		Seri	al#	40SL-R1-0807- 7572	Mfg yr	2007
Machine #2:							
Manufacturer			Cap	acity		lbs	
Model#			Seri	al#		Mfg yr	
	npermitted sou	rces only): ling out the notif	fication by f	he inspecto	\r [.] 9	ΠY	⊠N
	•	ing out its own not	-	-			⊠N ⊠N
Record keepin	•	ig out its own not	uncanon, a	lu will som			
-	0	specs as to the de	sion accura	ev of the te	emperature sensor?	⊠Y	□N
-		v/accuracy ∀2EF,	-	-	-		
Hazardous W		/ decuracy v 211,	, 01 7.220 ,	/ accuracy	01 v 1.1120,		
		tewater either trea	ated or disp	osed of pro	operlv?	⊠Y	□N
_		s it an approved s		_		⊠Y	
	. .	ary containment	•	e		$\overline{\boxtimes} Y$	□N
	•	ary containment	•	•		$\boxtimes \mathbf{Y}$	□N
Boiler:		-					
Manufacturer	Fulton					Нр	15
Model #	FB025A		Serial #	RM7895	A	Mfg yr	2005
Fuel Type:	Natural gas?		Propane?		Fuel oil? □		
Comments:	Exempt from pe	ermitting					

ENFORCEMENT SUMMARY

Facility Name:Hi Tech Cleaners & Laundry, Inc.ARMS #:103 0459

Viol#	Violation Description	Frequency	From	То
per00	Failure to notify and obtain a permit			
per01	No purchase records	Monthly		
per02	No perc. purchase rolling totals	Monthly	1/1/08	10/27/08
per03	No leak log	🛛 Weekly 🗌 Bi-weekly	1/1/08	10/27/08
per04	No temp. log	Weekly	1/108	10/27/08
per05	No SSM plan			
per06	Temp. sensor accuracy verification			
per07	No leak checks	🗌 Weekly 🔲 Bi-weekly		
per08	No temp. checks	Weekly		
per09	Perceptible leaks			
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
per02	Mr. Taek Ma showed a Perc purchase invoice, but had not recorded the amount into a record to calculate the 12 month rolling totals for Perc usage.
per03	Mr. Taek Ma did not obtain a 2008 calendar so did not keep records for leak checks
per04	Mr. Taek Ma because did not obtain a 2008 calendar so did not keep records for temperature reading.

Hi Tech Cleaners & Laundry, Inc.

5523 Roosevelt Blvd., Clearwater



Project Id:66854Permit No: 1030459-002-AGArms Number:Inspector:Shea JacksonInspection Date: 10/27/08Source (EU):Existing Large, Multi Matic L40, Serial No. 40SL-Ri-0807-7572 Dry-to-dry

machine (2007)

Description: <u>-The instructions for use were on the side panel of the detector.</u>

Hi Tech Cleaners & Laundry, Inc.

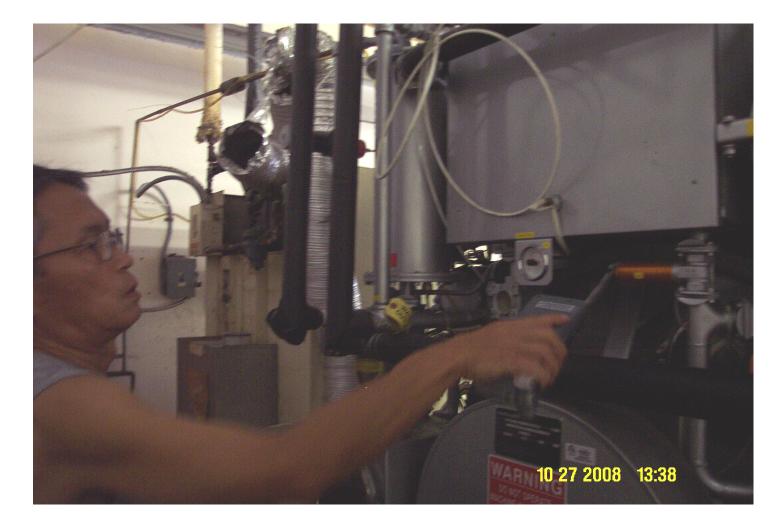
5523 Roosevelt Blvd., Clearwater



Project Id:	<u>66854</u>	Permit No: 1030459-002-AG	Arms Number:
Inspector:	Shea Jackson Inspection Date: 10/27/08		
Source (EU):	Existing Large, Multi Matic L40, Serial No. 40SL-Ri-0807-7572 Dry-to-dry		
	<u>machine (2007)</u>		
Description:	-The model information was on the end panel of the detector.		

Hi Tech Cleaners & Laundry, Inc.

5523 Roosevelt Blvd., Clearwater



 Project Id:
 66854
 Permit No: 1030459-002-AG
 Arms Number:

Inspector: Shea Jackson Inspection Date: <u>10/27/08</u>

Source (EU): Existing Large, Multi Matic L40, Serial No. 40SL-Ri-0807-7572 Dry-to-dry machine (2007)

Description: <u>-Mr. Taek Ma showed how he uses the Halogen detector during his Perc leak</u> <u>checks for the dry to dry machine.</u>