

### PERCHLOROETHYLENE DRY CLEANERS



### COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNU	JAL (INS1, INS2)	⊠ COMP	PLAINT/DISCOVERY (CI)	) 🗌		
RE-INSPECTION (FUI) ARMS COMPLAINT NO:						
	· , ,					
AIRS ID#:	Date: 11/3/2011	l Time	e In: 1:00PM	Time Out: 1:30PN	<u> </u>	
103 0495						
Facility Name:	U-Wash					
<b>Facility Location:</b>	20 West Morgan					
	Tarpon Springs,	FL, 34689				
Responsible Official:	Georgina Ellerbe		Phone No:	727-934-5978		
<b>Emis. Unit Description:</b>			ylene Dry Cleaner: On	e Dry-to-dry machine	(1984).	
Permit Number:	1030495-002-A0	3	Exp. Date:	6/17/2012		
<b>Facility Contact:</b>	Georgina Ellerbe	e	Phone:	727-934-5978		
<b>Compliance Status:</b>	⊠IN	MNC	SNC			
PART I: NOTIFICATIO	N (Check appropriate	e box)				
1. <b>Existing</b> facility notified	d DARM by 9/1/9	6			$\boxtimes$	
2. <b>New</b> facility notified DA	ARM 30 days prio	r to startup				
3. Facility <b>failed to notify</b>	DARM to use gen	neral permit				
PART II: CLASSIFICAT	ΓΙΟΝ					
Facility indicated on notif	fication form tha	t it is:				
☐ No Notification Form	n Drop-Of	f Store [	Out of business	Petroleum Solven	t Only	
<b>A.</b>						
1. Existing small area	source		2. New small area	source		
Dry-to-dry only, $x < 140$	0 gal/yr		Dry-to-dry only, x	<b>&lt;140</b> gal/yr		
Transfer only, $x < 200 g$	gal/yr	$\boxtimes$	Transfer only, $x < 2$	200 gal/yr		
Both types, $x < 140 \text{ gal/}$	<sup>'</sup> yr		Both types, $x < 140$	) gal/yr		
(Constructed <b>before 12/9/91</b> ) (Constructed on or <b>after 12/9/91</b> )				after 12/9/91)		
3. Existing large area s	source		4. New large area	source		
Dry-to-dry only, <b>140</b> > 2	<b>x &lt;2,100</b> gal/yr		Dry-to-dry only, 14	<b>40&gt; x &lt;2,100</b> gal/yr		
Transfer only, $200 > x < 1,800 \text{ gal/yr}$ $\Box$ Transfer only, $200 > x < 1,800 \text{ gal/yr}$						
Both types, $140 > x < 1,3$	800 gal/yr		Both types, $140 > x$	x <1,800 gal/yr		
(Constructed before 12	2/9/91)		(Constructed on or	after 12/9/91)		
This is a correct facility classification						
If no, please check the appropriate classification:						
□ Facility qualified for a general permit as number 1 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: 20 Gallons. Month with highest use was October 2011. Did facility exceed limits $\Box Y \boxtimes N$						
Di IIIgnest II montin com	secutive total of p	_			th	

#### 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? $\boxtimes Y$ $\prod N$ $\prod NA$ 3. Closing and securing machine doors except during loading/unloading? $\boxtimes Y$ $\prod N$ 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? $\prod Y$ $\prod N$ $\boxtimes NA$ 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 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) $\prod Y$ $\prod N$ $\bowtie$ NA 1. Equipped all machines with the appropriate vent controls? $\square Y$ $\square$ N $\boxtimes NA$ 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 $\prod Y$ $\prod N$ $\bowtie$ NA condenser upon opening the door? 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated $\prod Y$ $\prod N$ $\bowtie$ NA condenser on a weekly basis? 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the $\prod Y$ $\prod N$ $\bowtie$ NA condenser exceeded 45° F? 6. Conducted all temperature monitoring after an appropriate cool down period and after $\square Y$ $\square$ N $\boxtimes NA$ 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? $\square Y \bowtie N \bowtie NA$ 2. Measured and recorded the washer exhaust temre at the condenser inlet and outlet $\Box$ Y $\Box$ N $\Box$ NA weekly? °F? Is the temperature differential equal to or $\square Y \square N \square NA$ 3. Measured and recorded the concentration eekly at the end of the oer, machines are equipped final drying cycle while the e is venting with a carbon ad $\square Y$ $\square$ N $\square$ NA Is the per ppm? or less the $\square Y \quad \square N \quad \square NA$

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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?	□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
PA	ART V: RECORDKEEPING REQUIREMENTS	
	as the responsible official: heck appropriate boxes)	
1.	Maintained receipts for perc purchased?	⊠ Y □N
2.	Maintained rolling monthly averages of perc consumption?	$\boxtimes Y \square N$
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 □N ⊠NA □Y □N ⊠NA
4.	Maintained calibration data? (direct reading instruments only)	$\square Y  \square N  \boxtimes NA$
5.	Maintained exhaust duct monitoring data on perc concentrations?	$\square Y  \square N  \boxtimes NA$
6.	Maintained startup/shutdown/malfunction plan?	⊠ Y □N
7.	Maintained deviation reports? Problem corrected?	□Y □N ⊠NA □Y □N ⊠NA
8.	Maintained compliance plan, if applicable?	□Y □N ⊠NA

### PART VI: LEAK DETECTION AND REPAIRS

1.	Does the responsible official conduct weekly lea	ak det	ection a	nd repair inspection?	⊠ Y	□N		
2.	Which method of detection does the responsible official use?					□N		
	Visual examination (condensed solvent of	exteri	or surfac	es)	$\boxtimes Y$	$\square N$		
	Physical detection (airflow felt through ga	skets)			$\boxtimes Y$	$\square N$		
	Odor (noticeable perc odor)				$\boxtimes Y$	$\square N$		
	Use of direct-reading instrumentation (FID	)/PID/	calorime	tric tubes)	$\square Y$	$\boxtimes N$		
	If using direct-reading instrumentation, is the	equipi	ment:		$\square Y$	$\square N$		
	a. Capable of detecting perc vapor concent	tration	s in a ran	ige of 0-500 ppm	$\square Y$	$\square N$		
	b. Calibrated against a standard gas prior to	o and	after each	n use (PID/FID only).	$\square Y$	$\square N$		
	c. Inspected for leaks and obvious signs of	wear	on a wee	kly basis?	$\square Y$	$\square N$		
	d. Kept in a clean and secure area when not in use.					$\square N$		
	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	s by th	e operat	or:	$\boxtimes Y$	$\square N$		
	Hose connections, fitting couplings, and valves	$\boxtimes Y$	$\square N$	Muck cookers	$\square Y$	$\boxtimes N$		
	Door gaskets and seating	$\boxtimes Y$	$\square N$	Stills	$\boxtimes Y$	$\square N$		
	Filter gaskets and seating	$\boxtimes Y$	$\square N$	Exhaust dampers	$\boxtimes Y$	$\square N$		
	Pumps	$\boxtimes Y$	$\square N$	Diverter valves	$\square Y$	$\boxtimes N$		
	Solvent tanks and containers	$\boxtimes Y$	$\square N$	Cartridge Filter housing	$\boxtimes Y$	$\square N$		
İ	Water separators	$\boxtimes Y$	$\square N$					
Shea Jackson		November 3, 2011						
Inspector's Name (Please Print)		Date of Inspection						
		7	Within or					
Inspector's Signature		Within one year of this inspection  Date of Next Inspection						
inspector's signature			Date of Next inspection					

## **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 $S_0$ 63.322(k) or (l). $S_1$ 7 $S_2$ 8 $S_3$ 8 $S_4$ 9 $S_4$ 8 $S_4$ 9 $S_4$
(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 $\square$ N $\square$ 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? $\square Y \square NA$
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 canable of detecting vanor concentrations of BCE of 25 parts nor
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? $\square N \square NA$

#### ADDITIONAL SITE INFORMATION

Facility Name: U-Wash
ARMS #: 103 0495

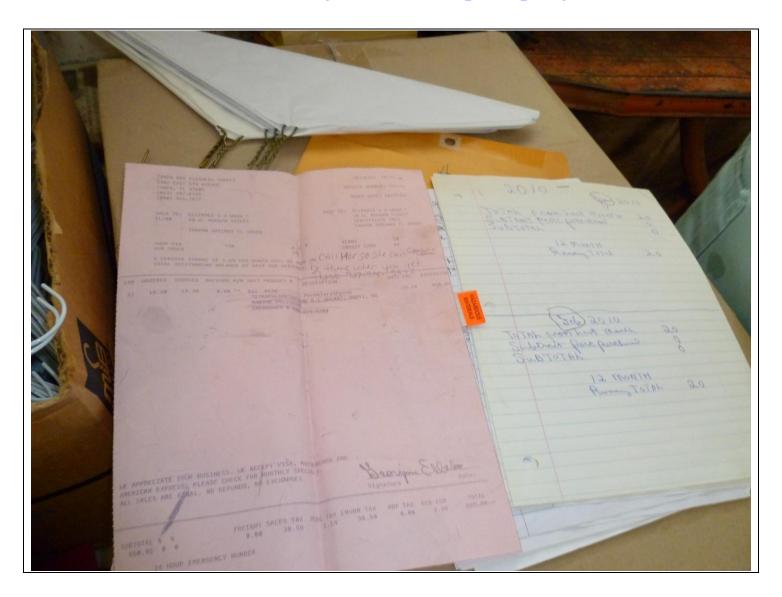
#### **Inspection Comments:**

- *I met with, the responsible official Georgina Ellerbee for inspection of the facility.*
- I observed the calendar records for the perchloroethylene totals and bi weekly leak detection observations. She is recording on notebook paper the perchloroethylene totals for each month to maintain her records.
- The most recent purchase of Perc was 10/10/11, of 19.3 gallons; the previous purchase was 19.3 gallons March 2009. She stated she still has not operated the dryer more than one cycle a week, expense of perc. She said customers not requesting dry cleaning and she does soap wash and press. The highest 12 month total was 20 gallons for October 2011. The hazardous waste disposal was in 2009.
- The R.O. Mrs. Ellerbee does not record the temperatures. It is not required for the existing small facility.
- I observed the Union Spa machine, was not in operation. The dryer equipment, hazardous waste containers and Galaxy mister evaporator were maintained and closed. The perchloroethylene hazardous waste containers are located in secondary containment.
- There were no perchloroethylene odors detected during the inspection of the facility.
- The facility uses an Eco Sensor Halogen Detector for its halogen detector, Ms Ellerbee states she keeps detector on when running a cycle.
- The facility appears to be in compliance at this time
- I gave her the P2 booklet, and pamphlet along with the inspection summary.

### ADDITIONAL SITE INFORMATION

Facility Name	: U-Wash							
ARMS #:	103 0495							
Machine #1:								
Manufacturer	Union Spa		Capa	city			lbs	
Model#	Homemade m	iodel	Serial	#			Mfg yr	
Machine #2:								
Manufacturer			Capac	city			lbs	
Model#			Serial	#			Mfg yr	
Notification (u	inpermitted sou	rces only):						
1. Was the faci	lity assisted in fi	lling out the no	otification by the	inspect	or?		$\square Y$	$\boxtimes N$
2. Did the facility insist on filling out its own notification, and will send it to FDEP?					$\square Y$	$\boxtimes N$		
Record keepir	ıg:							
1. Does facility	have statement/	specs as to the	design accuracy	of the t	emperature sen	sor?	$\square Y$	$\boxtimes N$
(Tempe	erature of $45^0$ F w	/accuracy +/- 2	2 <sup>0</sup> F, or 7.2EC w	/accurac	$y \text{ of } +/-1.1^{0}C)$			
Hazardous W	aste:	•			•			
1. Is all perc. contaminated wastewater either treated or disposed of properly?						$\boxtimes Y$	$\square N$	
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?					$\boxtimes Y$	$\square N$		
4. Does the facility have secondary containment for any perc. waste containers?					$\boxtimes Y$	$\square N$		
Boiler:								
Manufacturer	Fulton						Нр 5	
Model #			Serial #				Mfg yr	2010
Fuel Type:	Natural gas?		Propane?		Fuel oil?			
<b>Comments:</b>	Electric this uni	t is exempt						

20 west Morgan Street, Tarpon Springs



**Project Id:** <u>80698</u> **Permit No:** 1030495-002-AG **Arms Number:** <u>0495</u>

**Inspector:** Shea Jackson **Inspection Date / Time:** 11/3/2011 / \_\_\_\_\_

Source (EU): Esisting, Small Perchloroethylene Dry Cleaner. One Dry-to-dry machine,

purchased in December 1984,. 5 HP, electric fired boiler is on-site sli

**Description:** [Purchases invoices show Perc once a year, consecutive total usage 20 gallons very low usage]

20 west Morgan Street, Tarpon Springs



**Project Id:** <u>80698</u> **Permit No:** 1030495-002-AG **Arms Number:** <u>0495</u>

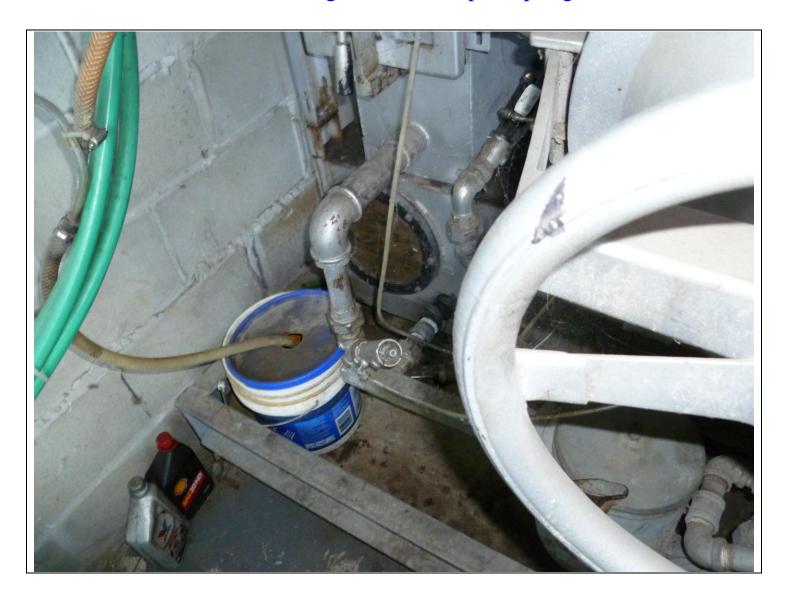
**Inspector:** Shea Jackson **Inspection Date / Time:** 11/3/2011 /

Source (EU): Esisting, Small Perchloroethylene Dry Cleaner. One Dry-to-dry machine,

purchased in December 1984,. 5 HP, electric fired boiler is on-site slj

**Description:** [Machine not in operation. Material usage is very low]

20 west Morgan Street, Tarpon Springs



**Project Id:** <u>80698</u> **Permit No:** 1030495-002-AG **Arms Number:** <u>0495</u>

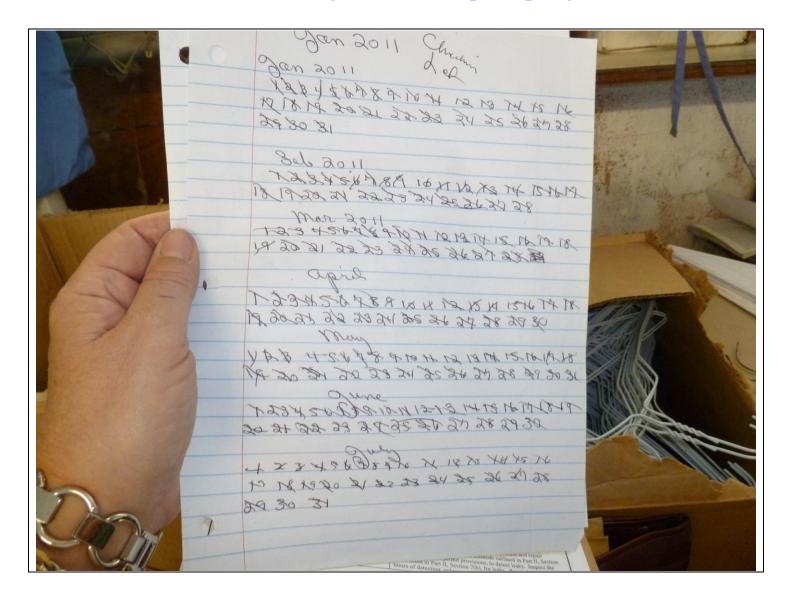
**Inspector:** Shea Jackson **Inspection Date / Time:** 11/3/2011 /

Source (EU): Esisting, Small Perchloroethylene Dry Cleaner. One Dry-to-dry machine,

purchased in December 1984,. 5 HP, electric fired boiler is on-site slj

**Description:** [Keeps dry to dry area clean and closed containers]

20 west Morgan Street, Tarpon Springs



**Project Id:** <u>80698</u> **Permit No:** 1030495-002-AG **Arms Number:** <u>0495</u>

**Inspector:** Shea Jackson **Inspection Date / Time:** 11/3/2011 /

Source (EU): Esisting, Small Perchloroethylene Dry Cleaner. One Dry-to-dry machine,

purchased in December 1984,. 5 HP, electric fired boiler is on-site slj

**Description:** [The responsible official maintains checks on the machine daily, requirement is for biweekly check]