



# Florida Department of Environmental Protection

Northwest District Office  
2353 Jenks Avenue  
Panama City, Florida 32405-4389

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard, Jr.  
Secretary

March 30, 2011

BY ELECTRONIC MAIL

[krspatel@aol.com](mailto:krspatel@aol.com)

Mr. Kirit R. Patel  
Lynn Haven Dry Cleaners  
2008 South Highway 77  
Lynn Haven, Florida 32444

Dear Mr. Patel:

On March 2 2011, a Department representative with the Air Resource Management Program inspected the Lynn Haven Dry Cleaners Facility ID 0050086. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact C. Mark Sumner at 850/767-0046, or [mark.c.sumner@dep.state.fl.us](mailto:mark.c.sumner@dep.state.fl.us).

Sincerely,

A handwritten signature in blue ink that reads 'Sally M Cooley'.

Sally M. Cooley  
Panama City Branch Administrator

SMC/ms

Enclosure

c: Ms. Mary Beth Curle, FDEP Pensacola ([mary.beth.curle@dep.state.fl.us](mailto:mary.beth.curle@dep.state.fl.us))  
Ms. Carol Melton, FDEP Pensacola ([carol.melton@dep.state.fl.us](mailto:carol.melton@dep.state.fl.us))



# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

**INSPECTION TYPE:** ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   
 RE-INSPECTION (FUI)  ARMS COMPLAINT NO:

**AIRS ID#:** 0050086 **DATE:** 3-2-2011 **ARRIVE:** 12:29 **DEPART:** 1:02  
**FACILITY NAME:** LYNN HAVEN DRY CLEANERS  
**FACILITY LOCATION:** 2008 S Hwy 77  
 LYNN HAVEN 32444-4232  
**OWNER/AUTHORIZED REPRESENTATIVE:** KIRIT PATEL **PHONE:** (850)265-6535  
**Email:** krspatel@aol.com **Mobile:**  
**CONTACT NAME:** NA **PHONE:**  
**Email:** NA **Mobile:**  
**ENTITLEMENT PERIOD:** 2/12/2011 / 2/12/2016  
 (effective date) (end date)

**PART I: INSPECTION COMPLIANCE STATUS** (check  only one box)

IN COMPLIANCE  MINOR Non-COMPLIANCE  SIGNIFICANT Non-COMPLIANCE

**PART II: FACILITY CLASSIFICATION - Rule 62-213.300 FAC**

(check  only one box in A)

**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)

**3. Existing large area source**

dry-to-dry only,  $140 \leq x \leq 2,100$  gal/yr  
 transfer only,  $200 \leq x \leq 1,800$  gal/yr  
 both types,  $140 \leq x \leq 1,800$  gal/yr  
 (constructed before 12/9/91)

**5. Ineligible for General Permit**

d rop store/out of business/petroleum /  
 facility exceeds above limits

**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)

**4. New large area source**

dry-to-dry only,  $140 \leq x \leq 2,100$  gal/yr  
 transfer only,  $200 \leq x \leq 1,800$  gal/yr  
 both types,  $140 \leq x \leq 1,800$  gal/yr  
 (constructed on or after 12/9/91)

**B.** The sum of the volume of all perchloroethylene (perc) purchases made in each of the previous 12 months by this dry cleaning facility was 114.00 gallons.

**PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC**

(check  only one box for each question)

1. Is all perc, and wastes containing perc, in tightly sealed & impervious containers? -----  Yes  No  N/A
2. Are all perc. containers leak free? -----  Yes  No  N/A
3. Are all machine doors kept closed and secured except during loading/unloading? -----  Yes  No
4. Are cartridge filters drained in their housing or in sealed containers for at least 24 hours prior to disposal? -----  Yes  No  N/A
5. Has each dry cleaning system installed after December 21, 2005 at an area source, routed the air-PCE gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser and passed the air-PCE gas-vapor stream from inside the dry cleaning machine drum through a non-vented carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine is opened? The carbon adsorber must be desorbed in accordance with manufacturer's instructions. -----  Yes  No  N/A
6. Is solvent-to-carbon ratios and steam pressure for carbon adsorber beds maintain 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.1.-4. Classification: page 1 of 4, this form)

1. If the facility classification is an **existing small area source**, no controls are required. **Proceed to Part V.**
2. If the facility classification is a **new small area source**, the machine should be equipped with a refrigerated condenser. **Complete section A. below.**
3. If the facility classification is an **existing large area source**, the machine should be equipped with either a refrigerated condenser or a carbon adsorber. **Complete both sections A and B below.** *Carbon adsorber must have been installed prior to September 22, 1993*
4. If the facility classification is a **new large area source**, the machine should be equipped with a refrigerated condenser. **Complete both sections A and B below.**

**A. Has the responsible official of all existing large area & new sources:**

(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  N/A
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

**PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)**

**B. For all existing large or new large area sources:**

1. Is the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines measured and recorded on a weekly basis? -----  Yes  No
2. Is the washer exhaust temperature at the condenser inlet and outlet measured and recorded weekly? -----  Yes  No  N/A
  - a) Is the temperature differential equal to, or greater than 20° F? -----  Yes  No  N/A
3. Is the perc concentration in the exhaust stream inlet and outlet measured 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. Is the sampling port on the carbon adsorber exhaust for measuring perc concentrations 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. Are transfer machines equipped (dryers, reclaimers, and washers) with individual condenser coils? -----  Yes  No  N/A
6. Is airflow routed to the carbon adsorber (if used) at all times? -----  Yes  No  N/A

**Note: Part IV B. is not applicable for this facility at this time.**

**PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC**

(check  only one box for each question)

1. Are receipts maintained for all perc purchased? -----  Yes  No
2. Are rolling monthly totals of yearly perc consumption maintained? -----  Yes  No
3. Are leak detection inspection and repair reports maintained for the following:
  - a) Of any leaks repaired w/in 24 hrs? or; -----  Yes  No  N/A
  - b) Of any 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. Is calibration data maintained for applicable direct reading instruments? -----  Yes  No  N/A
5. Is exhaust duct monitoring data on perc concentrations maintained? -----  Yes  No  N/A
6. Is a startup/shutdown/malfunction plan maintained for each machine? -----  Yes  No
7. Are deviation reports maintained? -----  Yes  No  N/A
  - a) Problem corrected? -----  Yes  No  N/A
8. Is a compliance plan maintained, if applicable? -----  Yes  No  N/A

**PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC**

(check  only one box for each question)

1. What type of leak detection equipment is used to detect leaks?  
 Halogenated hydrocarbon detector    PCE gas analyzer    None used
2. Is the halogenated hydrocarbon detector or PCE gas analyzer operated according to the manufacturer's instructions (*manual was available and RO could demonstrate procedure*) ? -----  Yes    No
3. For major sources is the halogenated hydrocarbon detector or PCE gas analyzer operated according to EPA Method 21 ?- -----  Yes    No    N/A
4. 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? -----  Yes    No
5. 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 (*based on documented specifications*) ? -----  Yes    No    N/A
6. Is the halogenated hydrocarbon detector capable of detecting vapor concentrations of PCE of 25 parts per million by volume (*based on documented specifications*) 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? -----  Yes    No    N/A
7. 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)*

a) Hose connections, fittings, couplings, and valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	g) Muck cookers -----	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
b) Door gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	h) Stills -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
c) Filter gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	i) Exhaust dampers -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
d) Pumps -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	j) Diverter valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
e) Solvent tanks and containers --	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	k) Cartridge filter housings	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
f) Water separators -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A				
8. 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)*)

a) Hose connections, fittings, couplings, and valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	g) Muck cookers -----	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
b) Door gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	h) Stills -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
c) Filter gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	i) Exhaust dampers -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
d) Pumps -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	j) Diverter valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
e) Solvent tanks and containers --	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	k) Cartridge filter housings	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
f) Water separators -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A				

**PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC (continued)**

9. What evidence suggests that leak checks are performed as required?

Leak log documentation    RO Assurances    On-site observation    other

Explain other : NA

C. Mark Sumner

March 2, 2011

\_\_\_\_\_  
Inspector's Name (Please Print)

\_\_\_\_\_  
Date of Inspection



March 2012

\_\_\_\_\_  
Inspector's Signature

\_\_\_\_\_  
Approximate Date of Next Inspection

**COMMENTS:** Mr. Kirit Patel, allowed me access to the facility's dry cleaning machines and provided me with all requested records. This facility operates two perc dry cleaning machines, one for dark colored fabrics, the other is for light colored fabrics. The facility uses a TIFKL-1A halogen leak detector for the required weekly leak checks (Fridays). All the perc and wastes containing perc were in tightly sealed and impervious containers. The machine doors appeared to be kept closed except during loading and unloading. The cartridge filters are drained in their housing using centripetal force to limit the amount of perc in the waste filter. The waste filters are stored in a sealed and impervious container and records were maintained for the proper disposal. Receipts were reviewed for January 2010 to February 2011 for all perc purchased. This facility has purchased 114 gallons of perc during the last 12 months. A facility record is kept with the inspections, maintenance, and repairs documented. A startup/shutdown/malfunction plan was provided for the dry cleaning machines, and the plan appears to be updated to match the current conditions at this facility. No signs of perc leaks or spills were noted at the time of this inspection.