



Florida Department of Environmental Protection

Northwest District Branch Office
630-3 Capital Circle NE
Tallahassee, Florida 32301

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

December 4, 2009

Bob Gardner
Carver Cleaners
1215 North Monroe Street
Tallahassee, Florida 32303-6148

Dear Mr. Gardner:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is **0730107**. The permit **expires on July 2, 2011**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the inspection results, the Tallahassee Branch Office reported a facility status of **In Compliance** for the January 8, 2009 inspection. The information that was requested was not received. However the following issue(s) **require your immediate attention**:

As of May 2009, the facility Responsible Official has changed. Please note that if the facility has to perform any "**Administrative Corrections**" as required by DEP Form 62-213.900(2), Part I, Section (3), and Chapter 62-213.300 F.A.C., the facility should submit those corrections immediately to the Department (**within 15 days receipt of this letter**).

Source:

62-213.300 F.A.C. Title V Air General Permits.

(2) General Procedures.

(c) Administrative Corrections. Within 30 days of any changes requiring corrections to information contained in the notification form, the responsible official shall notify the Department in writing. Such changes shall include:

1. Any change in name of the responsible official or facility address or phone number

Bob Gardner
December 04, 2009
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In order to complete the yearly inspection process, the enclosed "Annual Compliance Certification Form" will also have to be submitted. Please fill out your relevant sections of the form, including the Annual Reporting Period. The last recorded end date on your previously submitted form appears to be *July 2, 2009*. Please check your compliance status box, sign and date the bottom of the form, and return or mail the form back to this office. You may keep the yellow copy for your records.

The assistance you provided is appreciated. A copy of the inspection checklist and the **Administrative Corrections form** is attached. If you have any questions, your local contact is Tracy White at (850) 488-3704 or tracy.a.white@dep.state.fl.us.

Sincerely,



Marlane Castellanos
Branch Manager

MC/tw

Enclosures

cc: Rick Bradburn, FDEP, Pensacola
Mary Beth Curle, FDEP
Erica Mitchell, FDEP



PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730107 DATE: 12/01/2009 ARRIVE: 10:30 DEPART: _____
FACILITY NAME: CARVER CLEANERS
FACILITY LOCATION: 1215 North Monroe St
TALLAHASSEE 32303-6148
OWNER/AUTHORIZED REPRESENTATIVE: KOLA ALABI PHONE: (850)224-5002
CONTACT NAME: Bob Gardner PHONE:
ENTITLEMENT PERIOD: 7/2/2006 / 7/2/2011
(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)

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, $140 \leq x \leq 2,100$ 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)

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)

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 569 gallons.

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC(check ☒ only one box
for each question)**Does the responsible official of the dry cleaning facility:**

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
4. 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.1.-4. Classification: page 1 of 4, this form)

1. If the facility classification is a 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 a 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
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. 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° 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 condenser coils? ----- ☐ Yes ☐ No ☒ N/A
6. Route airflow to the carbon adsorber (if used) at all times? ----- ☐ Yes ☐ No ☒ N/A

PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC(check ☒ only one box for each question)**Does the responsible official:**

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 ☒ 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. Maintain calibration data? (*for applicable direct reading instruments*) ----- ☐ Yes ☐ No ☒ N/A
5. Maintain exhaust duct monitoring data on perc concentrations? ----- ☐ Yes ☐ No ☒ N/A
6. Maintain a startup/shutdown/malfunction plan? ----- ☒ Yes ☐ No
7. Maintain deviation reports? ----- ☐ Yes ☐ No ☒ N/A
 - a) Problem corrected? ----- ☐ Yes ☐ No ☒ N/A
8. Maintain a compliance plan, 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. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak

detection and repair inspection? -----	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Does the facility maintain a leak log? -----	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Does the responsible official check the following areas for leaks?	
a) Hose connections, fittings, couplings, and valves -----	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
b) Door gaskets and seating -----	<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
d) Pumps -----	<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
f) Water separators -----	<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
h) Stills -----	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
i) Exhaust dampers -----	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
j) Diverter valves -----	<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
4. Which method(s) of detection (is/are) used by the responsible official?	
a) Visual examination (condensed solvent on exterior surfaces) -----	a) <input checked="" type="checkbox"/>
b) Physical detection (airflow felt through gaskets) -----	b) <input checked="" type="checkbox"/>
c) Odor (noticeable perc odor) -----	c) <input checked="" type="checkbox"/>
d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) -----	d) <input type="checkbox"/> ** (see below)
e) Halogen leak detector -----	e) <input checked="" type="checkbox"/>
** If using direct-reading instrumentation, is the equipment: -----	
1) Capable of detecting perc vapor concentrations in a range of 0-500 ppm? -----	1) <input type="checkbox"/> Yes <input type="checkbox"/> No
2) Calibrated against a standard gas prior to and after each use (PID/FID only)? -----	2) <input type="checkbox"/> Yes <input type="checkbox"/> No
3) Inspected for leaks and obvious signs of wear on a weekly basis? -----	3) <input type="checkbox"/> Yes <input type="checkbox"/> No
4) Kept in a clean and secure area when not in use? -----	4) <input type="checkbox"/> Yes <input type="checkbox"/> No
5) Verified for accuracy by use of duplicate samples (calorimetric only)? -----	5) <input type="checkbox"/> Yes <input type="checkbox"/> No

Tracy White

12/01/2009

Inspector's Name (Please Print)

Date of Inspection

Tracy White

6-12 months

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

I met with Bob Gardner. Mr. Gardner had taken over the position of Responsible Official (RO) back in April 2009. I asked Mr. Gardner if he had submitted the "Administrative Corrections" as outlined in the July 28, 2009 report letter. He indicated that he had submitted the information to the Department. I check Department records on 12/02/2009 and his name did not appear in the computer system (see recommendations sections and cover letter for more details).

Next I requested the records for the last 12 months. Mr. Gardner explained that he has been keeping records since May 2009 (when he took over the operation). The 2009 leak and temperature check calendar was supplied, and Mr. Gardner supplied perc receipts from April 2009 to present. Records were maintained.

The machine was in cool down cycle and I observed a condensor exhaust temperature of 44 degrees F.

A halogen leak detector was available and leak checks appeared to have been performed at least monthly. Waste containers had tight fitting lids and a waste water disposal machines with filters was present.

Recommendations:

Administration corrections (new RO) are still not recorded in Department records.

Please read the November 1, 2009 information letter that is attached to this report and follow the instructions for "NEW RESPONSIBLE OFFICIAL." The required "Administrative Corrections" should be submitted to the Department within 15 days receipt of this letter.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

November 1, 2009

To: Users of the Air General Permit

Records in the Division of Air Resource Management indicate that you have claimed eligibility for your facility to operate under an Air General Permit (AGP) pursuant to Chapter 62-213, Florida Administrative Code (F.A.C.) and your entitlement to operate is about to expire.

As a source of air pollution, your facility is entitled to operate for no more than five (5) years with a permit under Section § 403.0872 Florida Statutes (F.S.). Rule 62-213.300, F.A.C., establishes that the duration of the permit is for five (5) years, and no later than thirty (30) days prior to the fifth anniversary of the filing of intent to use this general permit, the responsible official shall submit a new notice of intent which shall contain all current information regarding the facility.

If you wish to maintain your entitlement to operate you may obtain a copy of the appropriate registration form in the following manner(s). You may download a copy of the registration form from the FDEP Air Resource Management webpage below.

FDEP forms Webpage: http://www.dep.state.fl.us/air/emission/tv_gp.htm

or call the Small Business Environmental Assistance Program (SBEAP) toll-free @: **1-800 722-7457**

As the Owner/Operator or authorized representative for this facility, please complete the form, sign your name, date it, and submit it to the following address:

**Air General Permit Program
Bureau of Air Monitoring and Mobile Sources, MS5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400**

URGENT!

IMPORTANT

A facility is eligible to operate under a Title V Air General Permit (TV AGP) for no more than five (5) years. Your facility is approaching the end of the current five (5) year period for which it was entitled to operate under the Title V Air General Permit.

☐ **NEW OWNER?** If you are a **NEW OWNER**, please check ☒ this box and return this page with your completed Title V Air General Permit Notification Form.

☐ **NEW RESPONSIBLE OFFICIAL?** If you are a **NEW RO**, and/or your existing business has moved to a new location, please check ☒ this box and return this page with your completed Air General Permit Notification Form.

- If you wish to continue your entitlement, please complete the Air General Permit Notification Form, making certain that it is **signed by the Responsible Official (RO)**, properly dated, and mailed to the following address:

**Title V Air General Permit Program
Bureau of Air Monitoring and Mobile Sources, MS5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400**

- If you do not wish to continue with your eligibility, please disregard this notice.
- A fee is **NOT** required with the notification form.

**DRY CLEANER AIR QUALITY GENERAL PERMIT
ANNUAL COMPLIANCE CERTIFICATION FORM**

FACILITY NAME: _____ DATE: _____

FACILITY LOCATION: _____

Annual Reporting Period: _____ 20____ TO _____ 20____

Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement. ☐ YES ☐ NO

If NO, complete the following:

#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from _____ to _____

Action(s) taken to achieve compliance: _____

Method used to demonstrate compliance: _____

#2. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from _____ to _____

Action(s) taken to achieve compliance: _____

Method used to demonstrate compliance: _____

As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, my annual consumption of perchloroethylene solvent, based upon purchase receipts, does not exceed 2,100 gallons per year for dry-to dry facilities or 1,800 gallons per year for transfer or combination facilities.

RESPONSIBLE OFFICIAL: _____

Name (Please Print)

Signature

Date

*This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.