

# Florida Department of Environmental Protection

Northwest District Branch Office 3900 Commonwealth Boulevard, MS 55 Tallahassee, Florida 32399-3000 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Mimi A. Drew Secretary

December 15, 2010

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.

The Tallahassee Branch Office reported a status of In Compliance for your facility. However the following issue may **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 to the Department.

#### 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

Also, your permit will expire in July 2011. Please be aware that you will need to renew your permit prior to the next permitted period.

In order to complete the yearly inspection process, the enclosed "Annual Compliance Certification Form" should be submitted. Please fill out your relevant sections of the form, including the Annual Reporting Period. The last recorded end date on your previously

Bob Gardner December 15, 2010 Page 2

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. The inspection checklist is enclosed. If you have questions, your contact is Tracy White at (850) 245-2984 or  $\underline{\text{tracy.a.white@dep.state.fl.us}}$ .

Sincerely,

Marlane Castellanos

Madane Castellans

Branch Manager

MC/tw



### PERCHLOROETHYLENE DRY CLEANERS



#### COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS		T/DISCOVERY (CI)	
AIRS ID#: 0730107 DATE: 12/02/2010	ARRIVE:	DEPART:	
FACILITY NAME: CARVER CLEANE	RS		
FACILITY LOCATION: 1215 Nor	th Monroe St		
TALLAH	IASSEE 32303-6148		
OWNER/AUTHORIZED REPRESENT Email: CONTACT NAME: Email: ENTITLEMENT PERIOD: 7/2/2006 (effective date	/ 7/2/2011	PHONE: (850)224-5002 Mobile: PHONE: Mobile:	
PART I: INSPECTION COMPLIANCE  IN COMPLIANCE  MING		SIGNIFICANT Non-COMPLIANCE	
A. 1. Existing small area source dry-to-dry only, x < 140 gal/yr both types, x < 140 gal/yr (constructed before 12/9/91)  3. Existing large area source dry-to-dry only, 140 ≤ x ≤ 1,800 (constructed before 12/9/91)  5. Ineligible for General Perm d rop store/out of business/petr facility exceeds above limits	2. New small dry-to-dry transfer onl both types, (constructe  2,100 gal/yr 00 gal/yr 1 gal/yr 2. New large dry-to-dry transfer onl both types, (constructe dry-to-dry of gal/yr) 3 both types, (constructe dry-to-dry-transfer onl both types, (constructe dry-to-dry-transfer	only, x < 140 gal/yr ly, x < 200 gal/yr x < 140 gal/yr d on or after 12/9/91)	
B. The sum of the volume of all perceleaning facility was 540.00 gall	hloroethylene (perc) purchases ma ons.	ade in each of the previous 12 months b	y this dry

	PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC			(checl			
	1. Is all perc, and wastes containing perc, in tightly sealed & impervious containers?	$\boxtimes$	Yes		No		N/A
1	2. Are all perc. containers leak free?	$\boxtimes$	Yes		No		N/A
1	3. Are all machine doors kept closed and secured except during loading/unloading?	$\boxtimes$	Yes		No		
2	4. Are cartridge filters d rained in their housing or in sealed containers for at least 24 hours prior to disposal?		Yes		No	$\boxtimes$	N/A
5	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.	$\boxtimes$	Yes		No		N/A
6	5. Is solvent-to-carbon ratios and steam pressure for carbon adsorber beds maintain according to the manufacturer's specifications?		Yes		No	$\boxtimes$	N/A
<u>_</u>							
II .	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 an existing small area source, no controls are required. Proceedings of 2. If the facility classification is a new small area source, the machine should be equipped to condenser. Complete section A. below.  3. If the facility classification is an existing large area source, the machine should be equipped refrigerated condenser or a carbon adsorber. Complete both sections A and B below. Camust have been installed prior to September 22, 1993  4. If the facility classification is a new large area source, the machine should be equipped to condenser. Complete both sections A and B below.	with a	with e a dsor	gerated either a rber gerated	d a		
A	. Has the responsible official of all existing large area & new sources:		•	check x for e		-	
1.	. Equipped all machines with the appropriate vent controls?	$\boxtimes$	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?	$\boxtimes$	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	$\boxtimes$	N/A
6.	Conducted all temperature monitoring after an appropriate cool-down period and after verifying that the coolant had been completely charged?	$\boxtimes$	Yes		No		

P	PART IV: PROCESS VENT CONTROLS - Rule 62-213.300 FAC (continued)						
	B. For all existing large or new large area sources:  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?	$\boxtimes$	Yes		] No		
2.	. Is the washer exhaus t 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	$\boxtimes$	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	$\boxtimes$	N/A
	a) Is the perc concentration equal to, or less than 100 ppm?		Yes		No	$\boxtimes$	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	$\boxtimes$	N/A
<u>_</u>							
PA	ART V: RECORDKEEPING REQUIREMENTS - Rule 62-213.300(3) FAC		,	•		only o	
1.	Are receipts maintained for all perc purchased?	$\boxtimes$	Yes		No		
4	Are rolling monthly total s of yearly perc consumption maintained?		Yes		No		
ı	Are leak detection inspection and repair reports maintained for the following:						
	a) Of any leaks repaired w/in 24 hrs? or;	$\boxtimes$	Yes		No		N/A
	and parts meaning were a say	$\boxtimes$	Yes		No	П	N/A
		г			3.7	لبيا	27/4
	is cultivation data mamamed for appropriate		Yes		No		N/A
5.	Is exhaust duct monitoring data on perc concentrations maintained?		Yes		No		N/A N/A
5. 6.	Is exhaust duct monitoring data on perc concentrations maintained?		Yes Yes		No No		N/A
5. 6. 7.	Is exhaust duct monitoring data on perc concentrations maintained?  Is a startup/shutdown/malfunction plan maintained for each machine?  Are deviation reports maintained?		Yes Yes Yes		No No No		N/A
<ul><li>5.</li><li>6.</li><li>7.</li></ul>	Is exhaust duct monitoring data on perc concentrations maintained?  Is a startup/shutdown/malfunction plan maintained for each machine?  Are deviation reports maintained?		Yes Yes		No No		N/A

P	PART VI: <u>LEAK DETECTION AND REPAIRS</u> – Rule 62-213.300 FAC (check ☑ only one
1	. What type of leak detection equipment is used to detect leaks? box for each question)
	☐ Halogenated hydrocarbon detector ☒ PCE gas analyzer ☐ None used
2.	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
3.	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

9. What evidence suggests that leak checks are performed as required?  ☐ Leak log documentation ☐ RO Assurances ☐ On-site observation ☐ other  Explain other:						
Tracy White 12/02/2010						
Inspector's Name (Please Print)  Date of Inspection						
Inspector's Signature  Approximate Date of Next Inspection						
COMMENTS: I met with Bob Gardner. I requested the records. Records were available and maintained. The machine was in operation, but was in the wash cycle. No leaks or strong odors were noted. A wastewater disposal machine was present. A leak detector device was available for inspection.						
I asked Mr. Gardner about the "change in Responsible Official (RO)" issue as noted in the last inspection report. Department computer records indicate that Kola Alabi is currently listed as the RO. Mr. Alabi is no longer with the facility.						
Mr. Gardner is the current RO and indicated that he attempted to resolve the issue and "tried to do it." He explained that he had contacted the permitting department to get the name changed.						
Recommendations:						
Please contact one of the following in order to update the RO:						
Marnie Brynes [Marnie.Brynes@dep.state.fl.us] (850) 921-8978						
Dickson Dibble [Dickson.Dibble@dep.state.fl.us] (850) 921-9586						

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Revised	01	/13	8/0	0

<b>AIRS</b>	ID#:		
VII/O	$\mu \nu \pi$ .		

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

FACILITY NAME:		DATE:
FACILITY LOCATION:		
Annual Reporting Period:	20TO	20
Based on each term or condition of the Title V gene	pro-	
62-213.300, Florida Administrative Code (F.A.C.),	during the period covered by this statement.	YES UNO
If NO, complete the following:		
#1. Term or condition of the general permit that ha		porting period stated above:
	to	
Action(s) taken to achieve compliance:		
Method used to demonstrate compliance:		
#2. Term or condition of the general permit that ha	is not been in continuous compliance during the rep	porting 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 o in this notification are true, accurate and complete. purchase receipts, does not exceed 2,100 gallons pecombination facilities.	. Further, my annual consumption of perchloroethy	ylene solvent, based upon
RESPONSIBLE OFFICIAL:	Signature	Data
Name (Ple	ease Print) Signature	Date

<sup>\*</sup>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.



### **IMPORTANT**

## NOTIFICATION OF EXPIRING AIR GENERAL PEMIT REGISTRATION

If you wish to continue your Air General Permit (AGP) entitlement to operate, please submit a new, completed registration form to the following address:

Air General Permit Program
Bureau of Air Monitoring and Mobile Sources, MS 5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

	I am a new OWNER or AUTHOR	RIZED REPRESENTATIVE for t	his facility.				
	My business has moved to a new	location.					
	If you have checked any of the a AGP registration form.	-	form with your				
* and sub- sub- sub-							
SURRENDERING YOUR  AIR GENERAL PERMIT REGISTRATION							
By checking this box, I wish to surrender my AGP entitlement to operate and I are notifying the Department of the pending action by signing and dating this form below and returning it to the mail address above.							
My ARMS ID number is: <u>AG</u>							
Date:	/						
	(mm/dd/yyyy)	(SIGN YC	UR NAME HERE)				