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FLORIDA
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PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) RE-INSPECTION (FUI)	COMPLAINT/DISCOVERY (CI) 🛛 ARMS COMPLAINT NO:		
	ARRIVE: <u>1:10 PM</u> DEPART: <u>2:40 PM</u>		
FACILITY NAME: Best Dry Cleaners FACILITY LOCATION: 1144 W. 9 Mile Rd, Pensacola, FL 32534			
RESPONSIBLE OFFICIAL: Steve Litton PHONE: (850)477-0411			
CONTACT NAME: Steve Litton and Stacy Litton REMITTANCE YEAR: ENTITLEN	PHONE: (850)477-0411 MENT PERIOD: none / (effective date) /		
PART I: INSPECTION COMPLIANCE STATUS (check I 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. <u>New small area source</u> 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, $140 \le x \le 2,100$ gal/yr transfer only, $200 \le x \le 1,800$ gal/yr both types, $140 \le x \le 1,800$ gal/yr (constructed before 12/9/91)	4. New large area source dry-to-dry only, $140 \le x \le 2,100$ gal/yr transfer only, $200 \le x \le 1,800$ gal/yr both types, $140 \le x \le 1,800$ 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 			
b. The total quantity of perchloroeinylene (perc) purchased within the preceding 12 months by this dry cleaning facility was at least 95.2 gallons.			

PART III: <u>GENERAL CONTROL REQUIREMENTS</u> – Rule 62-213.300 FAC	(check 🗹 only one box
Does the responsible official of the dry cleaning facility:	for each question)
1. Store perc, and wastes containing perc, in tightly sealed & impervious containers?	\bigvee Yes \square No \square N/A
2. Examine the containers for leakage?	\bigvee Yes \square No \square 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: <u>PROCESS VENT CONTROLS</u> – Rule 62-213.300 FAC (Refer to Part II-A.14. Classification: page <u>1</u> of <u>4</u> , 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 <u>New small area source</u> , 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. <i>Carbon adsorber must have been installed prior to September 22, 1993</i>			
	4. If the facility classification is a <u>New large area source</u> , the machine should be equipped with a refrigerated condenser. Complete both sections A and B below.			
A.	Has the responsible official of all <u>existing large area & new sources</u> :		☑ only each ques	one box for stion)
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	

PA	PART IV: <u>PROCESS VENT CONTROLS</u> – Rule 62-213.300 FAC (continued)				
B.	Does the responsible official of an existing large or new large area source also:	(check ☑ only c each quest			
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 N	lo		
2.	Measure and record the washer exhaust temperature at the condenser inlet and outlet weekly?	- Yes I			
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: <u>RECORDKEEPING REQUIREMENTS</u> – Rule 62-213.300(3) FAC				
Does the responsible official:	(check ☑ only one box for each question)			
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: <u>LEAK DETECTION AND REPAIRS</u> – Rule 62-213.300 FAC

1. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak

(check ☑ only one box for each question)

detection and repair inspection?	Yes 🛛 No	
2. Does the facility maintain a leak log?	🗌 Yes 🖾 No	
 3. Does the responsible official check the following areas for leaf a) Hose connections, fittings, couplings, and valves Yes No N/A g b) Door gaskets and seating Yes No N/A h c) Filter gaskets and seating Yes No N/A i) d) Pumps Yes No N/A j e) Solvent tanks and containers Yes No N/A k f) Water separators Yes No N/A 	Muck cookers Yes No N/A Stills Yes No N/A Exhaust dampers Yes No N/A Diverter valves Yes No N/A	
4. Which method(s) of detection (is/are) used by the responsible official?		
 a) Visual examination (condensed solvent on exterior surfaces) a) b) Physical detection (airflow felt through gaskets) b) c) Odor (noticeable perc odor) c) d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) d) e) Halogen leak detector e) 		
**If using direct-reading instrumentation, is the equipment: ** N/A		
 Capable of detecting perc vapor concentrations in a range of Calibrated against a standard gas prior to and after each use Inspected for leaks and obvious signs of wear on a weekly 	e (PID/FID only)? 2) Yes No	
4) Kept in a clean and secure area when not in use? 4) Yes No		
5) Verified for accuracy by use of duplicate samples (calorime	etric only)? 5) Yes No	
Carol Melton	June 8, 2007	
Inspector's Name (Please Print)	Date of Inspection	

/s/

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: On June 8, 2007, the Department's Hazardous Waste Section (HW) notified the Department's Air Program of the subject unpermitted dry cleaner. That afternoon, I met our HW inspector at the facility located at 1144 West Nine Mile Road in Pensacola. The owners of the dry cleaner facility, Steve and Stacy Litton, indicated they had been operating the dry cleaning machine for approximately two years. The owners indicated they did not know they needed a permit.

Department inspectors explained the requirements for dry cleaners and gave the owners a copy of the dry cleaner registration form, a copy of the "Notice of Intent to Use an Air General Permit", and an Air Program "Dry Cleaner Calendar". I also gave them a print-out of our web page listing links for obtaining these forms electronically, and a copy of our dry cleaner general permit inspection form.

The owners indicated they would submit a registration form and "Notice of Intent to Use an Air General Permit", and would update the dry cleaner calendar rolling total calculations.

It was explained to the owners, that the Department would probably issue a warning letter asking the owners to arrange for a meeting to help clarify potential violations noted.

The dry cleaner machine was a 2-year-old Firbimatic SPA Vortex 40 Plus Chill. Receipts indicated 95.2 gallons of perchloroethylene (perc) had been purchased since June 2006. Facility operations included the appropriate collection of perccontaining waste in labelled hazardous waste containers with lids, and contracting with a hazrdous waste hauler to properly dispose of the waste on a regular basis.