

Department of Environmental Protection

Lawton Chiles Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Virginia B. Wetherell Secretary

September 23, 1996

Mr. Carl Carlson Town and Country Cleaners 2809 Cleveland Avenue Fort Myers, Florida 33901

Dear Mr. Carlson:

The Department has received the Title V General Permit Notification Form for the dry cleaning facility that you submitted on August 28, 1996.

Please note that in November of each year the Department will be mailing fee notices to those facilities using the Title V general permit. This annual operation fee is \$50 and it is due and payable between January 15 and March 1 of each year the facility is in operation and is subject to the requirements of the Title V general permit.

If you have or expect to have any changes in your mailing address, location address, responsible official, or phone number, please notify the Department at the following address:

Title V General Permits Office Bureau of Air Monitoring and Mobile Sources MS 5510 Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Fl 32399-2400

If there are any changes in the facility status, including change of operating parameters or equipment, or if you have any additional questions regarding the Title V General Permit Program, please contact the District or local air program compliance inspector in your area.

Sincerely,

Dotty Diltz, Chief

Bureau of Air Monitoring

and Mobile Sources

/DD

cc: Mr. Sherrill Culliver, South District

0710144

P.14
1. (a) add date control
device installed

P.15 4. mark new Small r.C. (f) Should be marked

Perchloroethylene Dry Cleaning Facility Notification

Facility Name and Location

1.	Facility Owner/Company Name (Name of corporation, agency, or individual owner):							
	2. Site Name (For example, plant name or number):							
2.								
	Town and Country Cleaners Hazardous Waste Generator Identification Number:							
3.	Hazardous Waste Generator Identification Number:							
	Facility Location:							
4.	Facility Location:							
	Street Address: 209 Cleve and Ave,							
	Facility Location: Street Address: 2809 Cleve and Ave, City: FL Myers County: Lee Zip Code: 33901							
5.	Facility Identification Number (DEP Use):							
	0710144							
	Responsible Official							
	Acsponsible Official							
6.	Name and Title of Responsible Official:							
	Carl Carlson Owner							
7.								
′ ·	Organization/Firm:							
	Street Address: 2800 Clevel C. A Ave.							
	City: Ft. Myers County: LEE. Zip Code: 33901 Responsible Official Telephone Number: Telephone: (County) 273(4 (144)							
8.	Responsible Official Telephone Number:							
	Telephone: (941) 334-6406 Fax: () -							
	Facility Contact (If different from Responsible Official)							
	, acting Contact (at animotic to the contact of the							
9.	Name and Title of Facility Contact (For example, plant manager):							
	·							
10.	Facility Contact Address:							
	Street Address:							
	City: Zip Code:							
11.	Facility Contact Telephone Number:							
	Telephone: () - Fax: () -							

RECEIVED

AUG 28 1996

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Bureau of Air Monitoring & Mobile Sources

Facility Information

1.(a) Provide the information below for each machine at the facility. Indicate the type of machine, the date of its purchase, and the date the control device was installed, if applicable.

	1	Date	Date		Date	Date		Date	Date
		Machine	Control		Machine	Control		Machine	Control
		Initially	Device		Initially	Device		Initially	Device
Type of Machine	ID	Purchased	Installed	ID	Purchased	Installed	ID	Purchased	Installed
Example	#1	03-OCT-93	12-NOV-93	#2	08-DEC-91		#3	02-MAR-92	02-MAR-9
Dry-to-Dry Unit			7.						
(1) w/ ref. condenser		21-5219	9U	Ė					
(2) w/ carbon adsorber		21-5807-9	î						
(3) w/ no controls		,,,,,,	f ·						
Washer Unit							·		
(4) w/ ref. condenser			Ī						
(5) w/ carbon adsorber							-		
(6) w/ no controls				 					
Dryer Unit		NJ kassa	14		٠.	:	<u> </u>		
(7) w/ ref. condenser			1	_					
(8) w/ carbon adsorber									-
(9) w/ no controls				_					
Reclaimer Unit						<u> </u>			
(10) w/ ref. condenser		· ·		i –					
(11) w/carbon adsorber				_				<u> </u>	
(12) w/ no controls				_			-		
(b) Control devices are(c) No control devices	_								
2.(a) What was the total of	gallo	ons	·	•	purchased in	the latest 12	2 mor	nths?	
(b) If less than 12 months, how many? [] months Check why it is less than 12 months: New owner: [] New store: [] Did not keep records: []									
3. What is the facility's so (Indicate with an "X".					nitions found	d in section (3	3) of	Part II?	
Existing small ar	ea so	ource []	Ne	w sn	nall area sour	rce [X]		
Existing large are	ea so	urce []	Ne	w la	rge area sour	ce []		

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 What control technology is required on machine (Indicate with an "X".) 	s pursuant to section (5) of Part	t II of this notification form?
Existing large area source Carbon adsorber []	Refrigerated condenser []
New small area source Refrigerated condenser []		
New large area source Refrigerated condenser []		
· .		
5. A facility which contains non-exempt emissions to Rule 62-213.300, F.A.C. Verify that all steam a exemption criteria or that no such units exist on-sit	nd hot water generating units o	
All steam and hot water generating units on-site (1 boiler HP or less), and (2) are fired exclusively by during which propane or fuel oil containing no mo	natural gas except for periods	of natural gas curtailment
All steam and hot water generating units exempt No such units on-site		
Equipment Monitoring	and Recordkeeping Informa	tion
Check all logs which are required to be kept on-site	e in accordance with the require	ements of this general permit:
(a) Purchase receipts and solvent purchases	Ĺ	\nearrow 1
(b) Leak detection inspection and repair	ί	$\boldsymbol{\varkappa}$
(c) Refrigerated condenser temperature monitoring	٠ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ ـ	<u>≯</u> i _Xi
(d) Carbon adsorber exhaust perc concentration mo		X 1
(e) Instrument calibration	[1
(f) Start-up, shutdown, malfunction plan	[]

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Surrender of Existing Air Permit(s)

Please indica	te with an "X" the appropriate selection:						
	I hereby surrender all existing air permits authorizing operation of the facility indicated in this notification form; specifically, permit number(s)						
(X)	No air permits currently exist for the operation of the facility indicated in this notification form.						
	Responsible Official Certification						
I, the undersigned, am the responsible official, as defined in Part II of this form, of the facility addressed in this notification. 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, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described above so as to comply with all terms and conditions of this general permit as set forth in Part II of this notification form.							
I will pro	Imptly notify the Department of any changes to the information contained in this notification. $8/V/96$						

Date

DEP Form No. 62-213.900(2)

Effective: 6-25-96

Facilities with Delinquent Invoice Fees for 1997

2Certifie Receive		ertified eceived	AIRS_ID	County	Reason for Nonpay	Owner	NAME	ADDRESS	ZIP4
			0550041	Highlands	unclaimed	HIGHLANDS CLEANERS &LAUNDRY INC	BILLY DOYLE	101 EAST MAIN STREET	AVON PARK FL 33825
	- 14	4-Feb-98	0710144	Lee		CARLSON CLEANERS INC	CARL CARLSON	2809 CLEVELAND AVE	FT MYERS FL 33901

RECEIVED AND MODILE SOURCES

SHUT DOWN - OCT. 19, 1997

PEACHLOROETHYLENE DRY CLEANERS

TITLE V GENERAL PERMIT COMPLIANCE INSPECTION CHECKLIST

TYPE OF INSPECTION:	ANNUAL	☑	COMPLAINT/DISCOVERY	01 0/1
•	RE-INSPECTION		e Mobile	3/4
		·	100 A	9/2 35
AIRS ID#: <u>055004/</u>	DATE: 10 - 23 - 77	_ TIME I	N: TIME OUT:	Sour Jiton
FACILITY NAME: Hig.	HANDS CLEANERS	& LAUN	ory INC.	
FACILITY LOCATION:	101 BOST MA	N STOP	e , -	
	AUGN PARK FE	3382:	.	
RESPONSIBLE OFFICIAL:	Buy Doyle		PHONE: <u>453 - 445 c</u>	·
CONTACT NAME:		•	PHONE:	·
PART I: NOTIFICATION				
(check appropriate box)				
1. New facility notified DARM	30 days prior to startup			
2. Facility failed to notify DAR	M to use general permit			
PART II: CLASSIFICATION	٧			
Facility indicated on notification (check appropriate box)			☐ No notification form ☐ Drop store out of business	petroleum
Facility indicated on notificat	rce 🗹 2. 'yr dry trai	nsfer only, x h types, $x < 1$	☐ Drop store out of business rea source ☐ x < 140 gal/yr < 200 gal/yr	petroleum
Facility indicated on notificate (check appropriate box) A. 1. Existing small area soundry-to-dry only, x < 140 gal/yr both types, x < 140 gal/yr	ce 2. /yr dry trai bot (co -ce 4. ,100 gal/yr dry gal/yr bot	to-dry only, nsfer only, x h types, x < nstructed on New large a to-dry only, nsfer only, 20 h types, 140	Prop store out of business rea source □ x < 140 gal/yr < 200 gal/yr 140 gal/yr or after 12/9/91)	petroleum
Facility indicated on notificate (check appropriate box) A. 1. Existing small area sound dry-to-dry only, x < 140 gal/yr both types, x < 140 gal/yr (constructed before 12/9/91) 3. Existing large area sound dry-to-dry only, 140 ≤ x ≤ 2 transfer only, 200 ≤ x ≤ 1,80 both types, 140 ≤ x ≤ 1,800	rce	-to-dry only, nsfer only, x h types, x < nstructed on New large a r-to-dry only, nsfer only, 20 h types, 140 nstructed on	Prop store out of business rea source $x < 140 \text{ gal/yr}$ $< 200 \text{ gal/yr}$ 140 gal/yr or after $12/9/91$) rea source $140 \le x \le 2,100 \text{ gal/yr}$ $00 \le x \le 1,800 \text{ gal/yr}$ $00 \le x \le 1,800 \text{ gal/yr}$	petroleum
Facility indicated on notificate (check appropriate box) A. 1. Existing small area sound 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 sound dry-to-dry only, 140 ≤ x ≤ 2 transfer only, 200 ≤ x ≤ 1,80 both types, 140 ≤ x ≤ 1,800 (constructed before 12/9/91) 5. This is a correct facility confidence of the facility of facility of the constructed before 12/9/91)	rce	to-dry only, nsfer only, x h types, x < nstructed on New large a to-dry only, nsfer only, 20 h types, 140 nstructed on \(\sum \sqrt{N}\)	Prop store out of business rea source $x < 140 \text{ gal/yr}$ $< 200 \text{ gal/yr}$ 140 gal/yr or after $12/9/91$) rea source $140 \le x \le 2,100 \text{ gal/yr}$ $00 \le x \le 1,800 \text{ gal/yr}$ $00 \le x \le 1,800 \text{ gal/yr}$ or after $12/9/91$) Can not determine	petroleum



Department of **Environmental Protection**



Lawton Chiles Governor

Mailing Address: Post Office Box 2549 Fort Myers, Florida 33902-2549 Virginia B. Wetherell Secretary

October 19, 1998

Mr. Joseph Sala Cape Cleaners 810 Cape Coral Parkway Cape Coral, Florida 33904

Re: Lee County - AP

PKCK/AK MOOIRE SOURCES Town and Country Cleaners

Dear Mr. Sala:

This inspection, conducted on October 14th, was mainly a compliance inspection conducted by Wayne Lewis and Karen Bayly, but we were also seeking answers for Tallahassee's air administration. This inspection covered both air and hazardous waste regulations which will be addressed by separate letters. The air regulations are in Rule 62 -213.300, Florida Administrative Code (F.A.C.) as well as being listed in your permit application. During the previous visit, on May 8, 1997, we explained the rules to Mr. Lore and assisted him in getting set up. Cited potential violations include problems with documentation and logs, not having a startup/shutdown/malfunction plan (SSM), and some problems with your handling of your hazardous waste.

Requirements:

As mentioned in the instructions for your permit application and discussed during all visits, Rule 62-213.300, F.A.C., has specific requirements related to your Permit. These requirements are mandated by EPA requirements for compliance with the Clean Air Act.

- 1. By definition, a small area source will use under 140 gal/yr. of Perchloroethylene(Perc.) while a large area source can use up to 2100 gal/yr.
- 2. A twelve month rolling average log of Perc. purchases is required along with the purchase receipts.
 - A. All Perc. stored on site must be stored in approved containers and within secondary containment as per 376.3078(7)(a) and (b) F.S.
- 3. A startup/shutdown/malfunction plan generated and maintained at facility. A deviation report is needed for any equipment/status changes or deviation from Standard Operational Procedures.

Mr. Joseph Sala Town and Country Cleaners October 19, 1998 Page Two

- 4. The exhaust stream of the outlet of the refrigerated condenser has some specific temperature monitoring requirements.
- 5. There is a specific leak inspection requirement weekly for large area sources and a minimum of bi-weekly for small area sources. Requirements 4 and 5 also lead into a repair report or tracking log.
- 6. Process controls require a closed loop venting system and a diverter valve(if needed).
- 7. Records are to be kept on site for a minimum of 5 years. (Note: Hazardous Waste only requires 3 years of data on site)
- 8. A copy of the Permit Notification is to be retained on site.

Findings:

Perchloroethylene is delivered and stored in 5 gallon cans (as delivered) and was being stored with the Hazardous Waste. The Perc. is being purchased from Phenix Supplies in Tampa. The receipts show Perc. purchases of 220 gallons over the past 12 month period which places you well into the large area source category and you did not fully maintain the required 12 month rolling average log. The facility was permitted as Town and Country Cleaners, but changed ownership nine months ago. General Permits are never transferable! As such, Town and Country Cleaners has been an unpermitted facility since your purchase. The facility does have an emergency procedure on it's machine but not the SSM plan EPA is wanting. The SSM plan they are talking about will be discussed herein with references made to examples. Your reported leak detection is being logged along with your temperature checks as - 'Date - Temperature - N'. Examples of what EPA wants for these checks will also be discussed herein. There were several hazardous waste violations on site which I'm sure Mrs. Bayly will be discussing in detail in her inspection report.

Potential Violations/Areas of Concern/Recommendations:

62-213.300(1)(a) The Responsible Official(R.O.) must submit a completed Perc. Dry Cleaner Air General Permit Notification Form 30 days prior to beginning operation.

We realize that you assumed the permit would just transfer when you purchased Town and Country Cleaners from Mr. Carlson. A new application has been left for you to complete and send in. Operating without a permit constitutes a major violation and is accumulative from the day you opened your doors under your ownership. As a result, Town and Country Cleaners has been in violation since you took possession. Your application needs to be completed and sent to either Tallahassee or me immediately and a copy needs to be retained at the facility. Once sent in, if you have not heard from Tallahassee or this office within 30 days, your copy becomes your permit.

Mr. Joseph Sala Town and Country Cleaners October 19, 1998 Page Three

40 CFR Part 63 Recordkeeping: Perc. Purchases - Receipts and Log Subpart M

When EPA mandated that a 12 month rolling log be kept along with the purchase receipts, they were talking about a continuous 12 month total that could be seen any time of the year. One of the immediate benefits of this log is that the Responsible Official would know immediately if he or she were about to violate their General Permit, as is this case. The permit Town and Country did have was for a small area source. If that permit were valid, small area sources are permitted under 140 gals of Perc. within a twelve month period. The reports that you are maintaining at your store are the start of what is called for, but in order for it to serve the intended purpose, you would have needed to carry through and kept your 12 month total. This total would have then told you when you were about to violate your permit limit, i.e. exceed 140 gallons. I'll assume this requirement was not understood back in May and will try to give you a running example. Unfortunately, I did not go back far enough so I'll have to fudge some to get started. It will all average out and be all correct by the time we get to the usable portion. The calendar that was left with you has an area for you to keep this log, if you choose to use the calendar, but your system of record keeping is entirely your choice. You can follow this example, inserting your data to build your 12 month average. You might also track through the missing months just to make sure you are doing it correctly. After you have it started, it is very easy to maintain.

•	Receipts			Calculations			
Feb 97 - 25	Mar 97 - 20	Apr 97- 15	Feb 97-25	Mar 97 -20	Apr 97 - 15		
May 97 -20	Jun 97 - 10	Jul 97 - 15	May 97 -20	Jun 97 - 10	Jul 97 - 15		
Aug 97 - 25	Sep 97 - 20	Oct 97 - 30	Aug 97-25	Sep 97 - 20	Oct 97 - 30		
Nov 97 - 20	Dec 97 - 20	Jan 98 - 20	Nov 97 - 20	Dec 97 - 20	Jan 98 - 20		
Feb 98 - 20	Mar 98 - 30	Apr 98 - 20			Total 240		
May 98-30	Jun 98 - 10	Jul 98 - 10					
Aug 98 - 20	Sep 98 - 10	Oct 98 - 10					

Mr. Joseph Sala Town and Country Cleaners October 19, 1998 Page Four

Twelve Month Running Total PERC PURCHASES (for Feb 1998)

<u>·····································</u>							
TOTAL FI							
MO	240						
(Jan							
1	SUBTRACT AMOUNT						
PURCHASED S	_ 25						
LAST	YEAR						
		12 MONTH					
DATE	AMOUNT	RUNNING					
	11.100111						
02/02/98	10 Gallons	225 Gal/Yr					
02/17/98	10 Gallons	235 Gal/Yr					

For May

TOTAL F		
MO	250 Gal/Yr	
Apr	(1998)	
SUBTRACT A	MOUNT	(May 97)
	SAME MONTH	20
LAST YEAR	•	
		12 MONTH
DATE	AMOUNT	RUNNING
	TOTAL	
05-11-98	240	
05-22-98	10 gallons	250
05-29-98	10 gallons	260

For June

1 of Julie							
TOTAL F							
MC	260 Gal/Yr						
May	(1998)						
SUBTRACT A		(June 97)					
	SAME MONTH	10					
LAST YEAR	•						
DATE	AMOUNT	12 MONTH RUNNING					
2	MIGGINI						
06-22-98	260						

For September

For September							
TOTAL FR	TOTAL FROM LAST						
MON	MONTH						
Aug (1	Aug (1998)						
SUBTRACT	SUBTRACT AMOUNT						
	PURCHASED SAME						
MONTH LA	AST YEAR						
		12 MONTH					
DATE	AMOUNT	RUNNING					
	121/20 01(1	TOTAL					
09-21-98	09-21-98 10 gallons						

For October

For October						
TOTAL FI						
MO	240 Gal/Yr					
Jun (Jun (1998)					
SUBTRAC	SUBTRACT AMOUNT					
PURCHASED	30					
LAST	YEAR					
		12 MONTH				
DATE	AMOUNT	RUNNING				
21111		TOTAL				
10-05-98	10-05-98 10 gallons					
Next	Purchase					

Mr. Joseph Sala Town and Country Cleaners October 19, 1998 Page Five

62-213.300(3)(k)1 The (R.O.) shall maintain records of monitoring information that specify the date, time, place, and operating condition of measurement;......; the company or entity which performed the monitoring; and the analytical results.

You are required to document leak inspections of both your equipment and waste drums. Air and hazardous waste regulations required, at minimum, weekly documented leak checks of your machine and containers. Small area sources are allowed bi-weekly machine inspections and the CESOG sources are exempt from the container inspection. These inspection reports must bear the inspectors printed name, the date and time of the inspection, and the condition of the item. Please refer to the calendar I left as an example of what is required. An inspection log was there, showing weekly inspection activity, but not showing what was inspected, when it was, or by whom it was. There was no reference to any leaks or the corrective activity or maintenance in the log, just a simple date, a temperature, and a "N". This also helps you when it comes to identifying problems and patterns. Part of the refrigerated condenser requirement is temperature monitoring. To verify proper operation and ensure maximum recapture of the Perc., the exhaust temperature of the condenser must be maintained below 45°F and the inspection must be documented weekly. Repairs and/or adjustments for exceedances also need to be documented. The problem must be logged, tracked, and corrected within a 24 hour period unless ordering parts is needed. If the parts are ordered, they need to be ordered within two days and installed within five days of receipt. These dates and times also need to be tracked to validate stopping and starting the time clock. Again, your log showed a date and a temperature but nothing else. When NCA printed those sheets, they didn't acknowledge time or signatures requirements.

Examples of the required logs are:

Leak Log

					Cital	Log					
Inspected	Leaking? WL 10/02 2:30	WL 10/09 3:00	ate /I	ime	Date	e/Fime	Date	/Time	Date/Time Ordered	Date/time Received	Date/time Repaired
P							Y	N			1
Pumps	N	N	Y	N	Y	N					
Door	N	N	Y	N	Y	N	Y	_N			
Hoses	N	N	Y	И	Y	N	Y	N _			
Solvent Tank	N	N	Y	N	Y	N	Y	N			
Water Separato	N	N	. Y	N	Y	N	Y	Ν			· ·
Muck Cooker	N	N	Y	N	Y	N	Y	N			
Still	N	N	Y	N	Y	N	Y	N			
Exhaust Damp	N	N	Y	N	Y	N	Y	N			
Diverter Valve	N	Inop.	Y	N	Y	N	Y	N			10/09 5:00
Filter Gasket	N	N	Y	N	Y	N	Ŷ	N			
Cartridge Filter	Ŋ	N	Υ.	N	Y	N	Y	N			

*NOTE: Initials must accompany each entry.

Mr. Joseph Sala Town and Country Cleaners October 19, 1998 Page Six

- 1. Fill out Leak Log if problem is found, document steps in Corrective Action Report
- 2. Fill out Temperature Log if temperature exceeds 45°F, fill out Corrective Action
- 3. Corrective Action is a report on what steps were taken to correct the problem(s).

Temperature Log (Fictitious)

Date	Time	Temperature	Is Temp ≤ 45° F (72°)	Name
02/01/98	12:39	39	Y N	J. Smith
02/15/98	01:15	43	Y N	J. Smith
02/15/98	01:00	48	Y N	L. Byeardd

L. Byeardd documented a temperature above 45°F. His next step should have been to start a corrective action report and to let the responsible official know a problem must be taken care of. In this case it might be a simple thing like getting the repair man to add freon and documenting. While 45°F is not a violation, it is a good signal point to start looking for possible problems. You might also be able to start spotting low freon or dirty coil patterns.

You are required to maintain a startup/shutdown/malfunction plan for your cleaning operation. A good source for developing this plan is your equipment manual. Along with standard startup and shutdown procedures, your plan should contain the steps needed to be taken in the event of a malfunction shutdown, i.e. leak checks, equipment checks, notification of R.O. The posted plan can reference the manual but it must be indicated as such on the plan. This is also where your operational procedures would be found should your unit go down. In your case, you have your other plant and possibly would not be effected too much but your SSM would have to specify what your plan would be. EPA has specified that they want Standard Operating Procedures to be documented in your SSM and if you have to deviate from that plan, a deviation report would be needed. Using the above example of your store breaking down, the SSM for you might already specify that "Cape Cleaners" would do all cleaning while the unit was down. As long as they stayed with that plan, a diviation report would not be needed. A corrective action or maintenance report would be sufficient. An example of a situation that could require this; we respond to a complaint call from an ex-employee who tells us you are short cycling the final cycle to catch up. Or we're told you are doing dry cleaning with a leaking machine while waiting for the part to come in. We arrive at your plant and find the complaint, at least, partially valid, i.e. you are conducting business but your equipment is down. As a complaint inspection, your SSM would have to tell us what was going on and who was doing your cleaning. Your diviation report would tell us if you chose to do something other than what your SSM said. Either report could invalidate the complaint but without it, you could be exposed to anyone, including disgruntle employees, that might be mad at you. Your defense against any charges start with your SSM. All product Perc. should be stored within the secondary containment area The containers, if stored for any length of time, need to be added to your routine inspections. The containers need to be kept sealed except when being poured into the unit.

Mr. Joseph Sala Town and Country Cleaners October 19, 1998 Page Seven

It should be noted that failure to address the following concerns could result in further violations of your Title V General Permit:

- 1. Rolling average and Perc. Receipts
- 2. Leak Inspection
- 3. Temperature monitoring
- 4. Startup/shutdown malfunction

While this was a multi-media inspection, the hazardous waste and dry cleaning program issues will be addressed by the hazardous waste section and discussed in a separate letter. All air related issues need to be addressed immediately.

If there are any questions regarding the above mentioned air issues, please contact Wayne Lewis or Sherrill Culliver at 941/332-6975.

Sincerely,

Wayne B. Lewis

Environmental Specialist

WBL/jw

cc: Karen Bayly, DEP - Fort Myers
Phil Lore, Town and Country Cleaners

PERCHLOROETHYLENE DRY CLEANERS

TITLE V GENERAL PERMIT COMPLIANCE INSPECTION CHECKLIST

TYPE OF INSPECTION:	ANNUAL RE-INSPECTION	G 1	COMPLAINT/DISC	OVERY	
airs id#: <u>07/0/44</u> facility name: <u>Cay</u> (
facility location: <u>28</u> —	09 Clevelan	d Ave, F	set Myens, FL	_ 3390 1	
					1
PART I: NOTIFICATION		· · · · · · · · · · · · · · · · · · ·			
(check appropriate box)					
1. Existing facility notified DA	-				
2. New facility notified DARM		· .			
3. Facility failed to notify DAR	M to use general per	mut 			
PART II: CLASSIFICATION		.,,,,			
Facility indicated on notificat (check appropriate box)	ion form that it is:				
A.	•				•
1. Existing small area soundry-to-dry only, x<140 gal/y transfer only, x<200 gal/yr both types, x<140 gal/yr (constructed before 12/9/91)	T	2. New small dry-to-dry only transfer only, x both types, x (constructed or	, x<140 gal/yr :<200 gal/yr		
3. Existing large area sour dry-to-dry only, 140 <x<2, (constructed="" 1="" 12="" 140<x<1,800="" 200<x<1,800="" 9="" 91)<="" before="" both="" ga="" only,="" td="" transfer="" types,=""><td>00 gal/yr gal/yr Vyr</td><td>transfer only, 2 both types, 140</td><td>area source ; 140<x<2, 100="" gal="" yr<br="">:00<x<1,800 gal="" yr<br="">:<x<1,800 gal="" yr<br="">n or after 12/9/91)</x<1,800></x<1,800></x<2,></td><td></td><td></td></x<2,>	00 gal/yr gal/yr Vyr	transfer only, 2 both types, 140	area source ; 140 <x<2, 100="" gal="" yr<br="">:00<x<1,800 gal="" yr<br="">:<x<1,800 gal="" yr<br="">n or after 12/9/91)</x<1,800></x<1,800></x<2,>		
This is a correct facility classif	īcation	DY ON	•		n de la companya de
If no, please check the appropr	iate classification:				
	ied for a general perr ds above limits and is			÷	
E. The total quantity of perchl facility was <u>/UU</u> gallons	•	rchased within	the preceding 12 month	ns by this dry	cleaning

PART III: GENERAL CONTROL REQUIREMENTS Is the responsible official of the dry cleaning facility: (check appropriate boxes) DAY DN 1. Storing perchloroethylene in tightly sealed and impervious containers? DY DN 2. Examining the containers for leakage? DY DN 3. Closing and securing machine doors except during loading/unloading? 4. Draining cartridge filters in their housing or in sealed containers for at UY UN least 24 hours prior to disposal? 5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? DY DN DN/A 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). Carbon adsorber must have been prior to September 22, 1993 installed If classification 4 has been checked, the 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) 1. Equipped all machines with the appropriate vent controls? DY DN 2. Equipped dry-to-dry machines with a closed-loop vapor venting system? ©Ý ON ON/A

3. Equipped the condenser with a diverter valve so airflow will be directed away from the

4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated

5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the

6. Conducted all temperature monitoring after an appropriate cooldown period and after

verifying that the coolant had been completely charged?

condenser upon opening the door?

condenser on a weekly basis?

condenser exceeded 45°F?

DY DN DN/A

DY ON

OY ON

DY ON

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?	מם עם
Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly?	ПА ПИ
Is the temperature differential equal to or greater than 20° F?	OY ON
3. Measured and recorded 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 with a carbon adsorber?	OY ON ON/A
Is the perc concentration equal to or less than 100 ppm?	DY DN
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 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet?	ים אם .
5. Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?	AVAC ND YC
6. Routed airflow to the carbon adsorber (if used) at all times?	AVAD ND YD
PART V: RECORDKEEPING REQUIREMENTS	
The state of the s	
Has the responsible official: (check appropriate boxes)	
Has the responsible official:	DY ON
Has the responsible official: (check appropriate boxes)	DY ON
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased?	
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption?	
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 3. Maintained leak detection inspection and repair reports for the following:	DY DN.
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 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	DY DN
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 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?	
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 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? 4. Maintained calibration data? (for direct reading instruments only)	OY ON ON/A
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 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? 4. Maintained calibration data? for direct reading instruments only) 5. Maintained exhaust duct monitoring data on perc concentrations?	OY ON OM/A OY OM OY OM OY OM
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 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? 4. Maintained calibration data? Gor direct reading instruments only) 5. Maintained exhaust duct monitoring data on perc concentrations? 6. Maintained startup/shutdown/malfunction plan?	OY ON OY ON OY ON OY ON OY ON
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 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? 4. Maintained calibration data? for direct reading instruments only) 5. Maintained exhaust duct monitoring data on perc concentrations? 6. Maintained startup/shutdown/malfunction plan? 7. Maintained deviation reports?	DY DM DY DM DY DM DY DM DY DM AVA DY DM AVA DY DM
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 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? 4. Maintained calibration data? **Gor direct reading instruments only** 5. Maintained exhaust duct monitoring data on perc concentrations? 6. Maintained startup/shutdown/malfunction plan? 7. Maintained deviation reports? Problem corrected? 8. Maintained compliance plan, if applicable?	DY DN DY DN
Has the responsible official: (check appropriate boxes) 1. Maintained receipts for perc purchased? 2. Maintained rolling monthly averages of perc consumption? 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? 4. Maintained calibration data? for direct reading instruments only) 5. Maintained exhaust duct monitoring data on perc concentrations? 6. Maintained startup/shutdown/malfunction plan? 7. Maintained deviation reports? Problem corrected?	DY DN DY DN

	The second secon					
2.	Which method of detection is used by th	e respon	sible of	ficial?		
	Visual examination (condensed so	lvent on	exterio	r surfaces)	<u>u</u>	
	Physical detection (airflow felt thro	ough gas	kets)	•	<u> </u>	
	Odor (noticeable perc odor)		••		9	
	Use of direct-reading instrumentat	ion (FID	/PID/ca	lorimetric tubes)		
	If using direct-reading instrumen	ntation,	is the e	quipment:		
	a. Capable of detecting p	erc vapo	r conce	ntrations in a range of 0-500 ppm?	DY I	⊐и
	b. Calibrated against a st (PID/FID only)?	andard g	as prio	r to and after each use	□Y (_ □N
	c. Inspected for leaks and	i obvious	signs o	of wear on a weekly basis?	□Y !	ΩN
	d. Kept in a clean and se	cure area	when	not in use?	□Y !	ΩN
	e. Verified for accuracy b	y use of	duplica	ate samples (calorimetric only)?	□Y (□и
3.	Has the facility maintained a leak log?				OY!	ЙN
4.	Does the responsible official check the f	ollowing	areas f	for leaks?		
	Hose connections, fittings, couplings, and valves	ey	ПИ	Muck cookers	Θ X	מם
	Door gaskets and seating	·PT	ПN	Stills	ΘY	ПN
	Filter gaskets and seating	ĎΥ.	ПИ	Exhaust dampers	D Y	ПИ
	Pumps	©Ý	N	Diverter valves	ΩY	□N .
١.	Solvent tanks and containers	ΦY	\square N	Cartridge filter housing	s 🗆Y	ON
	Water separators	ďÝ	ПИ		<u>:</u>	
_	Carl Carlown Name of Responsible Officia	1				

Name of Responsible Official

Sherral Cullivan

Inspector's Name (Please Print)

Sleval Callar

Inspector's Signature

Approximate Date of Next Inspection

PERCHLOROETHYLENE DRY CLEANERS

TITLE V GENERAL PERMIT COMPLIANCE INSPECTION CHECKLIST

TYPE OF INSPECTION:	ANNUAL	₫	COMPLAIN	T/DISCOVERY	
	RE-INSPECTION	. 0			
		·	· .		
AIRS 10#: \(\int \beta \beta \cdot 2\beta \frac{98}{98}\)	DATE: 10-14- 98	TIME II	N: <u>/3;30</u>	TIME OUT:	14:30
FACILITY NAME:	TOWNE & COUNT	Try CLEAN	ers		
FACILITY LOCATION:	2809 CLEAVELA	nd Ave.			<u> </u>
-	FT MYERS, FL	3390/	•		
RESPONSIBLE OFFICIAL	: Jugeph SA	<i>LA</i>	PHONE: _	941 549-1740	
CONTACT NAME:	Mr Lose	· · · · · · · · · · · · · · · · · · ·	PHONE: _	941 334-64	<u>.06</u>
PART I: NOTIFICATION					
(check appropriate box)					
1. New facility notified DARN	A 30 days prior to starti	лb		S. 1	
2. Facility failed to notify DA	RM to use general perm	nit			d
	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·		 	
PART II: CLASSIFICATIO	N				
Facility indicated on notifica	tion form that it is:		☑ No notifi	cation form	
(check appropriate box)			☐ Drop sto	re/out of business/pet	roleum
A. 1. Existing small area sou	irce 🗆 :	2. New small a	rea source	ם	7
dry-to-dry only, x < 140 ga		dry-to-dry only,			
transfer only, x < 200 gal/y	T 1	transfer only, x	< 200 gal/yr		
both types, x < 140 gal/yr		both types, $x < 1$		œ	
(constructed before 12/9/91	.) '	(constructed on	or after 12/9/	91)	12 Of 10 Of
3. Existing large area sou	irce 🗅	4. New large a	rea source		hir Nonitorine
dry-to-dry only, $140 \le x \le 1$		dry-to-dry only,		l00 gal/yr	
transfer only, $200 \le x \le 1.8$		transfer only, 20			Ces to
both types, $140 \le x \le 1,800$ (constructed before 12/9/91		both types, 140		=	<i>a a</i>
(constructed before 12/9/91	·)	(constructed on	of affer 12/9/	91)	
5. This is a correct facility	classification	OY ON	□Can not o	letermine	
☐ faci	e appropriate classifica lity qualified for a gene lity exceeds above limi	eral permit as nu	ımber <u>4</u> gible for a ger	above leral permit	
B. The total quantity of perch facility was 280 gallon		chased within the	he preceding	12 months by this dry	cleaning

PART III: GENERAL CONTROL REQUIREMENTS Is the responsible official of the dry cleaning facility: (check appropriate boxes) MY DN DN/A 1. Storing perchloroethylene in tightly sealed and impervious containers? DY ON DN/A 2. Examining the containers for leakage? MY DN 3. Closing and securing machine doors except during loading/unloading? 4. Draining cartridge filters in their housing or in sealed containers for at DY DN DN/A least 24 hours prior to disposal? 5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber DY DN WN/A beds according to the manufacturer's specifications? 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). Carbon adsorber must have been installed prior to September 22, 1993 If classification 4 has been checked, the 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) MY ON 1. Equipped all machines with the appropriate vent controls? MY DN DN/A 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 MY DN DN/A condenser upon opening the door? 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated DAY DN condenser on a weekly/bi-weekly basis? 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the MY ON MIN/A condenser exceeded 45°F? 6. Conducted all temperature monitoring after an appropriate cooldown period and after verifying that the coolant had been completely charged?

B. Has the responsible official of an existing large or new large area source also:	
Measured and recorded the exhaust temperature on the outlet side of the condenser l on dry-to-dry, reclaimer, and dryer machines on a weekly basis?	ocated
Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly?	OY ON WANA
Is the temperature differential equal to or greater than 20° F?	OY ON WON/A
3. Measured and recorded 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 with a carbon adsorber?	oy on Z n/a
	DY DN DNA
Is the perc concentration equal to or less than 100 ppm?	LI LIN WEN/A
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 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet?	, oy on w n/a
or expansion, and demissions no other mier.	
5. Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?	OY ON ON/A
6. Routed airflow to the carbon adsorber (if used) at all times?	OY'ON ON

PART V: RECORDKEEPING REQUIREMENTS					
Has the responsible official: check appropriate boxes)					
1. Maintained receipts for perc purchased?	d y □n				
2. Maintained rolling monthly averages of perc consumption?	DY W N				
3. Maintained leak detection inspection and repair reports for the following:					
a. documentation of leaks repaired w/in 24 hrs? or;	Y ON ON/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?	OY ON ODNA				
4. Maintained calibration data? (for applicable direct reading instruments)	OY ON BON/A				
5. Maintained exhaust duct monitoring data on perc concentrations?	oy on ⊠ n/a				
6. Maintained startup/sliutdown/malfunction plan?	DY MEN				
7. Maintained deviation reports?	OY ON ZNA				
Problem corrected?	OY ON ON/A				
8. Maintained compliance plan, if applicable?	OY ON MON/A				

PA	RT VI: LEAK DETECTION AND R	EPAIRS		
1.	Does the responsible official conduct a	weekly (for small source	s, bi-weekly) leak detection ar	id repair
	inspection?			a y □n
2.	Has the facility maintained a leak log?	•		⊉ Y □N
3.	Does the responsible official check the f	following areas for leaks	?	
	Hose connections, fittings, couplings, and valves	MY ON ON/A	Muck cookers	ZY ON ON/A
	Door gaskets and seating	AV ON ON/A	Stills	ØY □N □N/A
	Filter gaskets and seating	MY ON ON/A	Exhaust dampers	DY ON ON/A
	Pumps	dy on ona	Diverter valves	DY ON ON/A
	Solvent tanks and containers	AVO NO YA	Cartridge filter housings	ØY □N □N/A
	Water separators	DY ON ON/A		
4.	Which method of detection is used by the	ne responsible official?		
	Visual examination (condensed so	olvent on exterior surface	es)	প্র
	Physical detection (airflow felt thr	rough gaskets)		⊴
	Odor (noticeable perc odor)			□ ′
	Use of direct-reading instrumenta	tion (FID/PID/calorimet	ric tubes)	
	Halogen leak detector			
	If using direct-reading instr	umentation, is the equi	pment:	□N/A
	a. Capable of detecting p	perc vapor concentration	s in a range of 0-500 ppm?	OY ON
	b. Calibrated against a s (PID/FID only)?	tandard gas prior to and	after each use	OY ON
	c. Inspected for leaks an	d obvious signs of wear	on a weekly basis?	DY DN
	d. Kept in a clean and se	ecure area when not in u	se?	OY ON
	e. Verified for accuracy	by use of duplicate samp	oles (calorimetric only)?	NO YO
		4.		
-	The state of the s	· · · · · · · · · · · · · · · · · · ·		
		F _X		
			,	
<u>. </u>	Inspector's Name (Please Prin	·	10-14-98 Date of Inspe	ection
	Warne Lewis		10-99	
	Inspector's Signature		Approximate Date of	Next Inspection

P 262 305 183

US Postal Service Receipt for Certified Mail No Insurance Coverage Provided.

AIRS ID#: 0710144

CARLSON CLEANERS INC CARL CARLSON 2809 CLEVELAND AVE FT MYERS FL 33901

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	Special Delivery Fee	
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1995	Return Receipt Showing to Whom & Date Delivered	
Apri	Return Receipt Showing to Whom, Date, & Addressee's Address	
300,	TOTAL Postage & Fees	\$
PS Form 3800 , April 1995	Postmark or Date 2/14/5	77

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ADDRESS completed	3. Article Addressed to: AIRS ID#: 0710144 CARLSON CLEANERS INC CARL CARLSON 2809 CLEVELAND AVE FT MYERS FL 33901	4b. Service 1 Registere Express t	Type ed Certified Mail Insured ceipt for Merchandise COD
Is your <u>RETURN</u>	5. Received By: (Print Name) 6. Signature: (Addressee of Agent) PS Form 3811, December 1994	8. Addressee and fee is	e's Address (Only if requested

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	Postage	\$
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3. Article Addressed to: CARLSON CLEANERS INC CARL CARLSON 2809 CLEVELAND AVE FT MYERS FL 33901	if space does not learning and the date lear			
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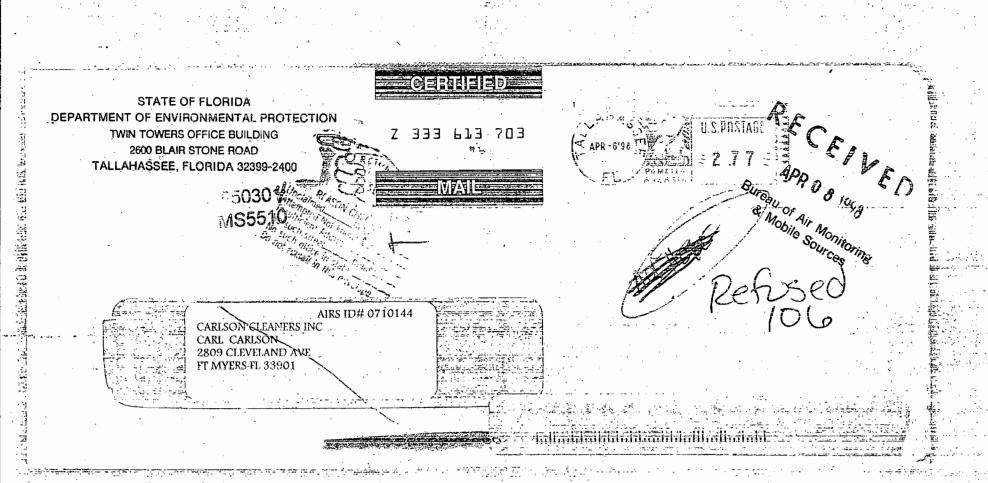
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CARL CARLSON
TOWN AND COUNTRY CLEANERS
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FT MYERS FL 33901

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			J		Special Delivery Fee			•		
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			Sign		Restricted Delivery Fee			<i>.</i>		
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		-	H	36	Return Receipt Showing to			٠,٠		
			1	=	Whom & Date Delivered					
			3	PS Form 3800 , April 1995	Return Receipt Showing to Whom,					
			3	`	Date, & Addressee's Address			Nº .		
		,	2	8	TOTAL Postage & Fees	\$				
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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

55030∜ MS5510

new owners)

TOWN AND COUNTRY CLEANERS
CARL CARESON
2809 CLEVELAND AVE
FT MYERS FL 33901

333 613 536 18:34 06/23/98



Bureau of Air Monitoring & Mobile Sources

Z- 333 613 536

US Postal Service

Receipt for Certified Mail

AÏRS ID# 0710144 TOWN AND COUNTRY CLEANERS CARL CARLSON 2809 CLEVELAND AVE FT MYERS FL 33901

	Postage	\$
PS Form 3800 , April 1995	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt Showing to Whom & Date Delivered	
	Return Receipt Showing to Whom, Date, & Addressee's Address	
800	TOTAL Postage & Fees	\$
PS Form	Postmark or Date	-