



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 14, 1997

Mr. Heinz Kurth
President
Town Center Cleaners
15306 Pembroke Point, Audubon C.C.
Naples, Florida 34110

Re: Facility No. 0210073

Dear Mr. Kurth:

The Department has received the Title V General Permit Notification Form for the dry cleaning facility that you submitted on February 26, 1997.


Please note that in January 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/jw

cc: Mr. Sherrill Culliver, South District

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

#0210073

P.14

3. new large area
Source should be
marked

P.15

4. new larger r.c.
Should be marked

Perchloroethylene Dry Cleaning Facility Notification **RECEIVED**

Facility Name and Location

FEB 26 1997

1. Facility Owner/Company Name (Name of corporation, agency, or individual owner):	BUREAU OF AIR REGULATION
<i>PRIMA DRY CLEANERS, INC.</i>	RECEIVED
2. Site Name (For example, plant name or number):	FEB 26 1997
<i>TOWN CENTER CLEANERS</i>	
3. Hazardous Waste Generator Identification Number:	Bureau of Air Monitoring & Mobile Sources
<i>FLD 984 187 880</i>	
4. Facility Location: Street Address: City: <i>NAPLES, FL 34112</i> County: <i>COLLIER</i> Zip Code: <i>34112</i>	
5. Facility Identification Number (DEP Use):	<i>0210073</i>

Responsible Official

6. Name and Title of Responsible Official:	<i>HEINZ KURTH, PRES.</i>
7. Responsible Official Mailing Address: Organization/Firm: Street Address: City: <i>NAPLES, FL</i> County: <i>COLLIER</i> Zip Code: <i>34110</i>	<i>15306 PEMBROKE POINT, AUDUBON C.C.</i>
8. Responsible Official Telephone Number: Telephone: <i>(941) 566-7084</i> Fax: <i>(941) 566-7084</i>	

Facility Contact (If different from Responsible Official)

9. Name and Title of Facility Contact (For example, plant manager):	<i>MARIA NINO, MGR.</i>
10. Facility Contact Address: Street Address: City: <i>NAPLES, FL</i> County: <i>COLLIER</i> Zip Code: <i>34112</i>	<i>3803 TAMMIAMI TRAIL EAST</i>
11. Facility Contact Telephone Number: Telephone: <i>(941) 775-4000</i> Fax: <i>(941) 775-4000</i>	

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.

Type of Machine	ID	Date Machine Initially Purchased	Date Control Device Installed	ID	Date Machine Initially Purchased	Date Control Device Installed	ID	Date Machine Initially Purchased	Date Control Device Installed
<i>Example</i>	#1	03-OCT-93	12-NOV-93	#2	08-DEC-91		#3	02-MAR-92	02-MAR-92
Dry-to-Dry Unit									
(1) w/ ref. condenser									
(2) w/ carbon adsorber		1 1988							
(3) w/ no controls	1	1988	1988						
Washer Unit									
(4) w/ ref. condenser									
(5) w/ carbon adsorber									
(6) w/ no controls	2	1995	1995						
Dryer Unit									
(7) w/ ref. condenser									
(8) w/ carbon adsorber									
(9) w/ no controls	3	1995	1995						
Reclaimer Unit <i>ENCL. IN DRY CLEANING MACHINE</i>									
(10) w/ ref. condenser	4	1988	1988						
(11) w/carbon adsorber									
(12) w/ no controls									

- (b) Control devices are required, but not yet installed *NEW EQUIPMENT WILL BE INSTALLED THE WEEK OF 2-24-97.*
- (c) No control devices are required to be installed

2.(a) What was the total quantity of perchloroethylene (perc) purchased in the latest 12 months?
 gallons

- (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 source classification based on the definitions found in section (3) of Part II?
 (Indicate with an "X". Select one classification only.)

- Existing small area source New small area source
- Existing large area source New large area source

Surrender of Existing Air Permit(s)

Please indicate 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) _____

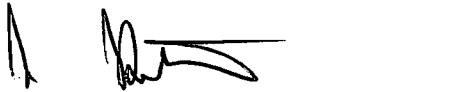
No air permits currently exist for the operation of the facility indicated in this notification form.

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 promptly notify the Department of any changes to the information contained in this notification.

Signature



Date

2/18/97

Z 333 613 504

US Postal Service

Receipt for Certified Mail

AIRS ID# 0210073

TOWN CENTER CLEANERS

HEINZ KURTH

15306 PEMBROKE POINT AUDUBON CC

NAPLES FL 34110

PS Form 3800, April 1995

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

AIRS ID# 0210073
TOWN CENTER CLEANERS
HEINZ KURTH
15306 PEMBROKE POINT AUDUBON CC
NAPLES FL 34110

4a. Article Number

Z 333 613 504

4b. Service Type

- | | |
|---------------------------------------------------------|-----------------------------------------------|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

6-25-98

5. Received By: (Print Name)

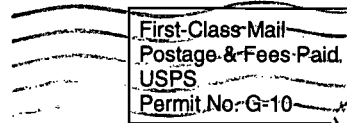
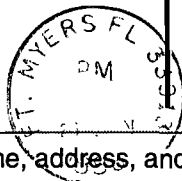
6. Signature: (Addressee or Agent)

X

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class-Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box. •

DARM/MOBILE SOURCE CONTROL PROGRAM
DEPT. OF ENVIRONMENTAL PROTECTION
MAIL STATION 5510
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

Bureau of Air Monitoring
& Mobile Sources

JUN 29 1998

RECEIVED





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

LETTER OF NONCOMPLIANCE

TO:

Our records indicate that you have previously claimed entitlement to use a Title V Air General Permit under Rule 62-213.300, Florida Administrative Code (F.A.C.), as the owner or operator of an eligible facility. However, if one or more of the following events has occurred, you are no longer eligible to operate under the Title V Air General Permit. Department records currently indicate that your facility is not in compliance with the item(s) checked below:

- 1) The facility has a new owner or operator (Rule 62-213.300(3)(a), F.A.C.).
- 2) The annual emissions fee for your facility has not been received by the Department (Rule 62-213.300(3)(b), F.A.C.).
- 3) The annual Compliance Certification for your facility has not been filed with the Department (Rule 62-213.300(3)(n), F.A.C.).

If your facility is to continue to operate under the Title V Air General Permit, the condition(s) referenced above must be corrected. Please call our Division for assistance--either **Sandra Bowman** at 850/921-9583 or **Rick Butler** at 850/921-9586.

The terms and conditions stated in the Title V Air General Permit continue to apply whether or not the facility is still operating. The Responsible Official (RO) is considered to be responsible for the permitted facility until the permit is surrendered, including any violations or payment of fees. If you wish to give up your eligibility to use the Title V Air General Permit, please sign and return this form in the enclosed self-addressed envelope. This will remove your name from our annual billing list used to notify when Title V permit fees are due.

I am the Responsible Official for the facility identified above and hereby notify the Department that I surrender the Title V Air General Permit for that facility.

Name (please print)

Signature

Date

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Facility Owner or Operator
Page Two

Your prompt response to correct or clarify this situation will be greatly appreciated. If you have any questions, please call the Division staff listed above or the Small Business Assistance Program hotline at 800/722-7457.

Sincerely,

A handwritten signature in cursive script that reads "Sandra Bowman".

Sandra Bowman
Title V Air General Permit Program

/SB

cc: District/Local program

PERCHLOROETHYLENE DRY CLEANERS

**TITLE V GENERAL PERMIT
COMPLIANCE INSPECTION CHECKLIST**

TYPE OF INSPECTION: ANNUAL COMPLAINT/DISCOVERY
 RE-INSPECTION

AIRS ID#:	<u>0210073</u>	DATE:	<u>4-29-98</u>	TIME IN:	<u>11:00</u>	TIME OUT:	<u>1:05</u>
FACILITY NAME:	<u>Prima Dry Cleaner (Town Center)</u>						
FACILITY LOCATION:	<u>3803 Tanager Trail</u>						
	<u>Naples, FL 34112</u>						
RESPONSIBLE OFFICIAL:	<u>HEINZ KURTH</u>	PHONE:	<u>Harbor</u>				
CONTACT NAME:	<u>Rose Perry (new owner)</u>	PHONE:	<u>941-775-4000</u>				

RECEIVED
 JUN 12 1998
 Bureau of Air Monitoring
 & Mobile Sources

PART I: NOTIFICATION

- (check appropriate box)
- 1. New facility notified DARM 30 days prior to startup
 - 2. Facility failed to notify DARM to use general permit

PART II: CLASSIFICATION

Facility indicated on notification form that it is:
 (check appropriate box)

<input type="checkbox"/> No notification form
<input checked="" type="checkbox"/> Drop store/out of business/petroleum

A.

1. Existing small area source <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> 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 <input type="checkbox"/> 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. This is a correct facility classification Y N Can not determine

If no, please check the appropriate classification:

- facility qualified for a general permit as number _____ above
- facility exceeds above limits and is not eligible for a general permit

B. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was _____ gallons.

PART III: GENERAL CONTROL REQUIREMENTS

Is the responsible official of the dry cleaning facility:
(check appropriate boxes)

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| 1. Storing perchloroethylene in tightly sealed and impervious containers? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Examining the containers for leakage? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. Closing and securing machine doors except during loading/unloading? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| 4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/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 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)

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| 1. Equipped all machines with the appropriate vent controls? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| 2. Equipped dry-to-dry machines with a closed-loop vapor venting system? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly/bi-weekly basis? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45°F? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 6. Conducted all temperature monitoring after an appropriate cooldown period and after verifying that the coolant had been completely charged? | <input type="checkbox"/> Y <input type="checkbox"/> N |

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? Y N
2. Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly? Y N N/A
Is the temperature differential equal to or greater than 20° F? Y N N/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? Y N N/A
Is the perc concentration equal to or less than 100 ppm? Y N N/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? Y N N/A
5. Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils? Y N N/A
6. Routed airflow to the carbon adsorber (if used) at all times? Y N N/A

PART V: RECORDKEEPING REQUIREMENTS

Has the responsible official:
(check appropriate boxes)

1. Maintained receipts for perc purchased? Y N
2. Maintained rolling monthly averages of perc consumption? Y N
3. Maintained leak detection inspection and repair reports for the following:
 - a. documentation of leaks repaired w/in 24 hrs? or; Y N 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? Y N N/A
4. Maintained calibration data? *(for applicable direct reading instruments)* Y N N/A
5. Maintained exhaust duct monitoring data on perc concentrations? Y N N/A
6. Maintained startup/shutdown/malfunction plan? Y N
7. Maintained deviation reports? Y N N/A
Problem corrected? Y N N/A
8. Maintained compliance plan, if applicable? Y N N/A

PART VI: LEAK DETECTION AND REPAIRS

1. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak detection and repair inspection? Y N
2. Has the facility maintained a leak log? Y N
3. Does the responsible official check the following areas for leaks?

Hose connections, fittings, couplings, and valves	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Muck cookers	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Door gaskets and seating	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Stills	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Filter gaskets and seating	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Exhaust dampers	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Pumps	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Diverter valves	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Solvent tanks and containers	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Cartridge filter housings	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Water separators	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A		
4. Which method of detection is used by the responsible official?
 - Visual examination (condensed solvent on exterior surfaces)
 - Physical detection (airflow felt through gaskets)
 - Odor (noticeable perc odor)
 - Use of direct-reading instrumentation (FID/PID/calorimetric tubes)
 - Halogen leak detector
 - If using direct-reading instrumentation, is the equipment: N/A
 - a. Capable of detecting perc vapor concentrations in a range of 0-500 ppm? Y N
 - b. Calibrated against a standard gas prior to and after each use (PID/FID only)? Y N
 - c. Inspected for leaks and obvious signs of wear on a weekly basis? Y N
 - d. Kept in a clean and secure area when not in use? Y N
 - e. Verified for accuracy by use of duplicate samples (calorimetric only)? Y N

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

INTEROFFICE MEMORANDUM

Date: 20-Aug-1998 05:12pm
From: Wayne Lewis FTM
LEWIS_W@A1@FTM1
Dept: South District Office
Tel No: 941/332-6975

To: Sandy Bowman

(Bowman_s@A1@DER)

Subject:

Sandy

Had town centre come in I have permit app in hand - will send
Called Paul on your last message Story finally out

Kurt - German guy who owned Prima - had to dump the cleaners
sold to Paul at very low price
Paul turned around and sold to Pavey at marked increase
Pavey is owner

PS Pavey is former owner of professional
welcome to "Wacky DC World"

PSS So far the damage at my Duplex is going to cost
me in excess of \$2500 and I've also received my tax
bill for this year - property value dropped but my taxes
have increased to just over \$3000.
Welcome to "Cape Corruption"

INTEROFFICE MEMORANDUM

Date: 17-Aug-1998 11:09am
From: Sandy Bowman TAL
BOWMAN_S
Dept: Air Resources Management
Tel No: 850/921-9583

To: Wayne Lewis FTM

(LEWIS_W @ A1 @ FTM1)

Subject: Prima Dry Cleaners

Hi Wayne!

We received a note from Mr. Knauerhase that Prima Cleaners was sold to:

Breshne Corp.
Paul Breshne, Pres.
883 Vanderbilt Beach Blvd
Naples, FL 34108

This is getting very confusing. I don't know how Mr. Pavey fits into all of this. Do you have any ideas???

Keep up the good work!!!

Thanks.

Sandy

INTEROFFICE MEMORANDUM

Date: 22-Jul-1998 04:40pm
From: Wayne Lewis FTM
LEWIS_W@A1@FTM1
Dept: South District Office
Tel No: 941/332-6975

To: Sandy Bowman TAL (BOWMAN_S@A1@DER)

Subject: Re: Professional Dry Cleaners

(1) I have a note from Dennis Bamberg saying that he is the new owner of Professional Cleaners (AIRS ID#0210068). I checked the database and we have no record (other than this note) that the facility has changed hands. Do you know the status?

(2) I have another change in ownership for you. Prima Dry Cleaners Inc. at 15306 Pembroke Point Audubon CC in Naples (ID# 0210073) has a new owner, Mr. Knauerhase. I will send the new owner a notification form and copy you.
Sandy,

We went to One Hour Professional Cleaners but Bamberg was not there. I also just finished calling and leaving a message on his machine. Bamberg was there last year for the inspection but I guess every-one assumed he was the contact cause that's what he was listed as. In speaking to the young lady behind their counter, Mr Bamberg took ownership two years ago. If you get the new app. first, let me know but I do plan to keep up on it and I'll send it through interoffice if I get there first.

Don't have any idea who Mr. Knauerhase is unless he's the new owner of the house at Pembroke Point. The plant is on Tamiami Trail East and it is owner by the new owners I contacted you about back in May. I've been waiting for you to get the new number in the system but now I take it, you never got the app. I do remember they wanted the name back to Towne Centre Cleaners instead of Prima Dry Cleaners. However, our trip to Naples wasn't a total waste today and neither was these two interesting messages. The owner of the Towne Centre Cleaners is Rose Pavey. Her husband says he has owned a previous Dry Cleaner but Rose hasn't. I thought it rather interesting that his name is Stan Pavey. If we added a 'ley' to Stan, I'd say we had a remarkable similarity with the previous owner of Professional Dry Cleaner. Be interesting to find out where this leads cause I do believe Haz. Waste is planning on sending them a personal invitation to a "party" here at the office. Karen did a follow-up to the CAV and start-up visit and letters we made late April/ early May. This place was baaaddd. Don't you just love when we spend so much time to help someone and they just blow you off..... I'll stay on it in between everything else.....

*file in
new Nat.
when
Arrives -*



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

LETTER OF NONCOMPLIANCE

AIRS ID# 0210073

TO: TOWN CENTER CLEANERS
HEINZ KURTH
15306 PEMBROKE POINT AUDUBON CC
NAPLES FL 34110

RECEIVED
JUL - 8 1998
Bureau of Air Monitoring
& Mobile Sources

Our records indicate that you have previously claimed entitlement to use a Title V General Permit under Rule 62-213.300, Florida Administrative Code (F.A.C.), as the owner or operator of an eligible facility. However, if one or more of the following events has occurred, you are no longer eligible to operate under the Title V Air General Permit. Department records currently indicate that your facility is not in compliance with the item(s) checked below:

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- 2) The annual emissions fee for your facility has not been received by the Department (Rule 62-213.300(3)(b), F.A.C.).
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If your facility is to continue to operate under the Title V Air General Permit, the condition(s) referenced above must be corrected. Please call our Division for assistance--either **Sandra Bowman at 850/921-9583** or **Rick Butler at 850/921-9586**.

The terms and conditions stated in the Title V Air General Permit continue to apply whether or not the facility is still operating. The Responsible Official (RO) is considered to be responsible for the permitted facility until the permit is surrendered, including any violations or payment of fees. If you wish to give up your eligibility to use the Title V Air General Permit, please sign and return this form in the enclosed self-addressed envelope. This will remove your name from our annual billing list used to notify when Title V permit fees are due.

I am the Responsible Official for the facility identified above and hereby notify the Department that I surrender the Title V Air General Permit for that facility.

PRIMA DAY CLEANERS, INC.

GEROLD KNAUERHASE *[Signature]*
Name (please print) Signature

7-5-98
Date

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Facility Owner or Operator
Page Two

RECEIVED
JUL - 8 1998
Bureau of Air Monitoring
& Mobile Sources

Your prompt response to correct or clarify this situation will be greatly appreciated. If you have any questions, please call the Division staff listed above or the Small Business Assistance Program hotline at 800/722-7457.

Sincerely,



Sandra Bowman
Title V Air General Permit Program

/SB

cc: District/Local program



Department of Environmental Protection

Lawton Chiles
Governor

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

RECEIVED
AUG 10 1998
Bureau of Air Monitoring
& Mobile Sources
Virginia B. Wetherell
Secretary

July 9, 1998

8-6-98

Mr. Gerold Knauerhase
Prima Dry Cleaners Inc.
15306 Pembroke Point Audubon CC
Naples, Florida 34110

*PLEASE BE ADVISED THAT I AM
NOT THE NEW OWNER OF THE
BUSINESS, WHICH WAS SOLD TO:
BRIEHNNE CORP.
PAUL H. BREEHNE, PRES.
883 VANDERBILT BEACH RD.
NAPLES, FL 34108.*

Dear Mr. Knauerhase:

Thank you for informing us that you are the new owner of Prima Dry Cleaners, Inc. We received your note July 8.

In accordance with Rule 62-213.300(3), Florida Administrative Code (F.A.C.), the Title V Air General Permit is not-transferrable and does not follow a change in ownership of the facility. Therefore, I am enclosing a Perchloroethylene Dry Cleaner Air General Permit Notification Form, for your convenience. Please complete this form and submit it to the following address:

General Permits Section
Bureau of Air Monitoring and Mobile Sources, Ms 5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

The terms and conditions for perchloroethylene dry cleaning facilities are listed in Part II of the enclosed notification form. If you have any questions pertaining to the completion of this form or the Title V air general permit program, please contact either Rick Butler at 850/921-9586 or me at 850/921-9583.

Sincerely,

Sandra Bowman
Mobile Source Control Section
Bureau of Air Monitoring and
Mobile Sources

SB/

Enclosure..

cc: Wayne Lewis, South District

Rick Butler "Protect, Conserve and Manage Florida's Environment and Natural Resources"

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):
3. Hazardous Waste Generator Identification Number:
4. Facility Location: Street Address: City: County: Zip Code:
5. Facility Identification Number (DEP Use):

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& Mobile Sources

Responsible Official

6. Name and Title of Responsible Official:
7. Responsible Official Mailing Address: Organization/Firm: Street Address: City: County: Zip Code:
8. Responsible Official Telephone Number: Telephone: () - Fax: () -

Facility Contact (If different from Responsible Official)

9. Name and Title of Facility Contact (For example, plant manager):
10. Facility Contact Address: Street Address: City: County: Zip Code:
11. Facility Contact Telephone Number: Telephone: () - Fax: () -

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.

Type of Machine	ID	Date Machine Initially Purchased	Date Control Device Installed	ID	Date Machine Initially Purchased	Date Control Device Installed	ID	Date Machine Initially Purchased	Date Control Device Installed
<i>Example</i>									
	#1	03-OCT-93	12-NOV-93	#2	08-DEC-91		#3	02-MAR-92	02-MAR-92
Dry-to-Dry Unit									
(1) w/ ref. condenser									
(2) w/ carbon adsorber									
(3) w/ no controls									
Washer Unit									
(4) w/ ref. condenser									
(5) w/ carbon adsorber									
(6) w/ no controls									
Dryer Unit									
(7) w/ ref. condenser									
(8) w/ carbon adsorber									
(9) w/ no controls									
Reclaimer Unit									
(10) w/ ref. condenser									
(11) w/carbon adsorber									
(12) w/ no controls									

(b) Control devices are required, but not yet installed

(c) No control devices are required to be installed

2.(a) What was the total quantity of perchloroethylene (perc) purchased in the latest 12 months?
 gallons

(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 source classification based on the definitions found in section (3) of Part II?
 (Indicate with an "X". Select one classification only.)

Existing small area source New small area source

Existing large area source New large area source

4. What control technology is required on machines pursuant to section (5) of Part II of this notification form?
(Indicate with an "X".)

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 units shall not be eligible to use the general permit pursuant to Rule 62-213.300, F.A.C. Verify that all steam and hot water generating units on-site meet the following exemption criteria or that no such units exist on-site:

All steam and hot water generating units on-site (1) have a total heat input of 10 million BTU/hr or less (298 boiler HP or less), and (2) are fired exclusively by natural gas except for periods of natural gas curtailment during which propane or fuel oil containing no more than one percent sulfur is fired.

All steam and hot water generating units exempt

No such units on-site

Equipment Monitoring and Recordkeeping Information

Check all logs which are required to be kept on-site in accordance with the requirements of this general permit:

(a) Purchase receipts and solvent purchases

(b) Leak detection inspection and repair

(c) Refrigerated condenser temperature monitoring

(d) Carbon adsorber exhaust perc concentration monitoring

(e) Instrument calibration

(f) Start-up, shutdown, malfunction plan

Surrender of Existing Air Permit(s)

Please indicate 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)

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 promptly notify the Department of any changes to the information contained in this notification.

Signature

Date

Part III. Notification

The Perchloroethylene Dry Cleaning Facility Notification, pages 13-16 of this form, shall be completed and submitted to the Division of Air Resources Management **at least 30 days prior to beginning operation, or by September 1, 1996, whichever is later.** Please type or print clearly all information. A copy of this notification form shall be kept on-site and made available for review by Department personnel.

The responsible official of the facility, as defined in Part II of this notification form, is responsible for ensuring that the facility complies with all applicable terms and conditions of this general permit, as set forth in Part II of this form.

Mail the signed and completed pages 13 through 16 of this form to:

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

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Bureau of Air Monitoring
& Mobile Sources

Instructions

Facility Name and Location

1. **Facility Owner/Company Name** - Enter the name of the corporation, agency, or individual that has ownership or control of the dry cleaning facility for which this notification is submitted.
2. **Site Name** - Enter the common name, if any, of the facility site; for example, Plant A, Metropolis plant, etc. If more than one facility is owned, a notification form must be completed for each.
3. **Hazardous Waste Generator Identification Number** - Enter the hazardous waste generator identification number, if known, assigned by the Department to the facility.
4. **Facility Location** - Enter the street address and zip code of the facility and the city and county in which it is located.
5. **Facility Identification Number (DEP Use)** - Enter the facility identification number assigned by ARMS.

Responsible Official

6. **Name and Title of Responsible Official** - Enter the name and title of the designated responsible official for the facility who, by signing this form, is certifying that the facility is eligible for a general permit pursuant to the requirements of Part II of this notification form and Rule 62-213.300, F.A.C.
7. **Responsible Official Mailing Address** - Enter the mailing address for the responsible official if different than the address entered in No. 4 above.
8. **Responsible Official Telephone Number** - Enter the telephone number and facsimile number, if available, at which the responsible official can be contacted.

Facility Contact

9. **Name and Title of Facility Contact** - Enter the name of the facility contact, if other than the responsible official. For example, a plant manager could be designated as the facility contact for Department inspections.

10. **Facility Contact Address** - Enter the mailing address for the facility contact, if different than the address entered in No. 4 above.
11. **Facility Contact Telephone Number** - Enter the telephone number and facsimile number, if available, at which this person can be contacted.

Facility Information

1. For each machine located at the facility, select the appropriate machine type and subheading corresponding to the type of air pollution control device installed on the machine (e.g., dry-to-dry unit (1) w/ ref. condenser). Enter its identification (e.g., #1) in column 1. Enter the date the machine was initially purchased from the manufacturer in column 2 in the dd-mon-yy format. If you do not know the exact date of purchase, but can confirm it was prior to December 9, 1991, enter 08-DEC-91. If control equipment has been installed on that machine, enter the date of installation in column 3. If control equipment is required, but has not yet been installed, indicate with an "X" in 1(b). If no control devices are required to be installed, indicate this with an "X" in 1(c). Up to three machines of each type and control configuration may be entered across this table. Complete the table for all machines located at the facility. If more than three machines are located on-site, submit additional copies of this page of the form as needed to characterize all equipment.
2. Enter the total amount, in gallons, of perchloroethylene purchased during the preceding twelve months. If this amount represents a period of less than twelve months, indicate the actual time period used to determine solvent purchases and the reason for this discrepancy (e.g., new store). New owners should attempt to obtain solvent purchase records from the previous owner.
3. Using the amount entered in No. 2 above, enter the facility's classification (e.g., existing small area source). The classification is based on the definitions found in section (3) of Part II of this notification form.
4. Indicate which control technology is required on machines pursuant to section (5) of Part II of this notification form, based upon the selection in No. 3 above. Existing small area sources are not required to install any additional control equipment.
5. Indicate with an "X" that all steam and hot water generating units on-site are exempt from permitting pursuant to Rule 62-210.300(3), F.A.C., or that the facility has no such units on-site.

Equipment Monitoring and Recordkeeping Information

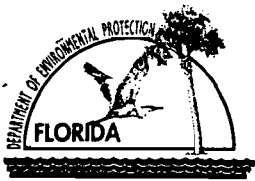
Indicate all logs which are required to be kept on-site in accordance with the requirements of this notification form with an "X".

Surrender of Existing Air Permit(s)

Rule 62-213.300(2)(a)2., F.A.C., makes the surrender of all existing air permits authorizing the operation of a facility a condition precedent for the entitlement to a general permit. Indicate whether the responsible official surrenders such permit(s) or whether no such permit(s) exist with an "X".

Responsible Official Certification

This statement must be signed by the person named on page 13, Field 6, of this form.



Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

PERCHLOROETHYLENE DRY CLEANER AIR GENERAL PERMIT NOTIFICATION FORM

Part I. Procedures For Use of General Permit

- (1) Eligibility Determination.** The responsible official of the facility shall determine its eligibility for a Title V air general permit pursuant to the applicability criteria of Rule 62-213.300(1), F.A.C., set forth in Part II, section (1), of this notification form.
- (a) No facility which contains a non-exempt emissions unit, other than a unit described in this Title V air general permit, shall be eligible to use any air general permit in Rule 62-213.300, F.A.C. No facility is eligible to use more than one air general permit. An emissions unit or activity is exempt from permitting if all of the following criteria are met:
1. The emissions unit or activity would qualify for an exemption from permitting pursuant to the criteria of Rule 62-210.300(3)(a), F.A.C.;
 2. The emissions unit or activity would be subject to no unit-specific applicable requirement;
 3. The emissions unit or activity would not emit or have the potential to emit:
 - a. 500 pounds per year or more of lead and lead compounds expressed as lead;
 - b. 1,000 pounds per year or more of any hazardous air pollutant;
 - c. 2,500 pounds per year or more of total hazardous air pollutants; or
 - d. 5.0 tons per year or more of any other regulated pollutant; and
 4. The emissions unit or activity, in combination with other units and activities at the facility, would not cause the facility to emit or have the potential to emit:
 - a. 100 tons per year or more of carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, or volatile organic compounds;
 - b. 5 tons per year or more of lead and lead compounds expressed as lead;
 - c. 10 tons per year or more of any hazardous air pollutant;
 - d. 25 tons per year or more of total hazardous air pollutants; or
 - e. 100 tons per year or more of any other regulated pollutant.
- (b) Any facility that would use a Title V air general permit under Rule 62-213.300, F.A.C., must surrender all existing air permits authorizing the operation of the facility.
- (c) If a facility at any time becomes ineligible for the use of the Title V air general permit and is subject to the Title V air operation permit requirements of Chapter 62-213, F.A.C., it shall be subject to enforcement action for operating without an air operation permit.
- (d) Notwithstanding the shield provisions of Rule 62-213.460, F.A.C., any facility utilizing a Title V air general permit will be subject to enforcement action for operation without a permit under Chapter 62-213, F.A.C., if it is determined to be initially ineligible for the air general permit which is being utilized.
- (2) Notification.** For each facility intending to operate under the provisions of this Title V air general permit, the responsible official must complete and submit Part III of this Perchloroethylene Dry Cleaner Air General Permit Notification Form (DEP Form No. 62-213.900(2)) to give notice to the Department of intent to use such permit.

- (3) **Administrative Corrections.** Within 30 days of any changes requiring corrections to information contained in this notification form, the responsible official shall notify the Department in writing. Such changes shall include:
- (a) Any change in name of the responsible official or facility address or phone number, or
 - (b) A change in facility status requiring more frequent monitoring or reporting by the responsible official from that noted on the most recent notification form.
- (4) **Violation of Permit.** This Title V air general permit is valid only for the specific activity indicated. Any deviation from the specified activity and the conditions for undertaking that activity is a violation of the permit. The responsible official is placed on notice that violation of the permit constitutes grounds for revocation and suspension pursuant to Rules 62-4.100 and 62-4.530(4), F.A.C., and initiation of enforcement action pursuant to s. 403.141 through 403.161, F.S. No revocation shall become effective except after notice is served by personal service, certified mail, or newspaper notice pursuant to Section 120.60(7), F.S., upon the person or persons named therein and a hearing held, if requested within the time specified in the notice. The notice shall specify the provision of the law or rule alleged to be violated, or the permit condition or Department order alleged to be violated, and the facts alleged to constitute a violation thereof.
- (5) **Nullification of Eligibility.** Eligibility for use of a Title V air general permit is automatically nullified by:
- (a) Submission of false or inaccurate information in the notification form for use of the Title V air general permit or in the required reports;
 - (b) Refusal of lawful inspection by Department staff;
 - (c) Failure to submit operational reports or other information required by the general permit; or
 - (d) Failure to timely pay the required annual emissions fee, penalty, or interest.

Part II. Permit Terms and Conditions

- (1) Applicability.** This part of the Perchloroethylene Dry Cleaner Air General Permit Notification Form (DEP Form No. 62-213.900(2)) establishes the terms and conditions of this Title V air general permit. Perchloroethylene dry cleaning facilities are eligible to operate under the terms and conditions of this air general permit provided the responsible official submits a completed Part III of this notification form to the Department at least 30 days prior to beginning operation or by September 1, 1996, whichever is later, and throughout the term of the general permit, all of the following conditions are met:
- (a) The facility operates no emissions units other than perchloroethylene dry cleaning systems and emissions units which are exempt from permitting pursuant to the criteria of Rule 62-213.300(2)(a)1, F.A.C., set forth in Part I, section(1)(a), of this notification form.
 - (b) The facility is classified as a Title V source pursuant to paragraph (f), only, of the definition of "major source of air pollution" at Rule 62-210.200, F.A.C.; that is, the facility is a Title V source by virtue of being subject to 40 CFR Part 63, Subpart M, but does not emit any pollutant in a major amount as set forth in paragraphs (a) through (e) of the definition of "major source of air pollution;" and
 - (c) The facility complies with all general conditions of Rule 62-213.300(3), F.A.C., set forth below, all requirements of Rule 62-296.412, F.A.C., as applicable, and all requirements of 40 CFR Part 63, Subpart M, as applicable, also set forth in this part of the notification form.
- (2) General Conditions.** All terms, conditions, requirements, limitations, and restrictions set forth in Rule 62-213.300, F.A.C., and listed below are "general permit conditions" and are binding upon the owner or operator and upon the responsible official of the facility utilizing this Title V air general permit.
- (a) The duration of this general permit is five years. No later than 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.
 - (b) The owner or operator of the facility must, upon written notice from the Department, submit payment of an annual operation fee in the amount of \$50.00. This fee is due and payable between January 15 and March 1 of each year for which the facility is in operation and subject to the requirements of this general permit.
 - (c) This general permit is valid only for the specific activity indicated. Any deviation from the specified activity and the conditions for undertaking that activity shall constitute a violation of the permit.
 - (d) This general permit does not convey any vested rights or any exclusive privileges, nor does it authorize any injury to public or private property nor any invasion of personal rights. It does not authorize any infringement of federal, state, or local laws or regulations.
 - (e) This general permit does not relieve the responsible official or the owner or operator of the facility from liability and penalties when the operation of the permitted activity causes harm or injury to human health or welfare; causes harm or injury to animal, plant or aquatic life; or causes harm or injury to property. It does not allow the responsible official, owner, or operator to cause pollution in contravention of Florida law.
 - (f) This general permit conveys no title to land or water, nor does it constitute state recognition or acknowledgment of title.
 - (g) The responsible official shall make every reasonable effort to conduct the specific activity authorized by this permit in a manner that will minimize any adverse effects on adjacent property or on public use of the adjacent property, where applicable, and on the environment, including fish, wildlife, natural resources, water quality, or air quality.
 - (h) The responsible official shall allow a duly authorized representative of the Department access to the permitted facility or activity at reasonable times to inspect and test, upon presentation of credentials or other documents as may be required by law, to determine compliance with this general permit and Department rules.
 - (i) The responsible official shall maintain any permitted facility or activity in good condition.
 - (j) This general permit shall be effective until suspended, revoked, surrendered, expired, or nullified pursuant to Rule 62-213.300, F.A.C.

(k) Recordkeeping and Reporting Requirements.

1. The responsible official shall maintain records of monitoring information that specify the date, place, time, and operating conditions of measurement; the methodology used; the company or entity which performed the monitoring; and the analytical results. These shall include all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
2. The responsible official shall retain records of all monitoring data and supporting information for a period of at least five years from the date of collection.
3. The responsible official shall submit semi-annual monitoring reports in which all occurrences of deviations from the general permit conditions shall be clearly identified. The responsible official shall certify each report as true, accurate, and complete.
4. The responsible official shall submit reports on all deviations from permit conditions, including those attributable to malfunctions, to the Department on a semi-annual basis. Such reports shall identify the probable cause of such deviations, and any corrective actions or preventative measures taken. The responsible official shall certify each report as true, accurate, and complete.

(l) Operation and Maintenance Requirements.

1. The responsible official shall maintain on-site a start-up, shutdown, and malfunction plan for the facility that describes in detail procedures for operating and maintaining the equipment during periods of start-up, shutdown, and malfunction. The plan shall also specify corrective action for malfunctioning process and air pollution control equipment.
2. During periods of start-up, shutdown, or malfunction, the responsible official shall operate and maintain equipment in accordance with the procedures specified in the plan. Records of the plan implementation of best operational practices shall be kept on-site for a minimum of five years.
3. The responsible official shall submit a start-up, shutdown, and malfunction report to the Department on a semi-annual basis. The report shall state whether any start-ups, shutdowns, or malfunctions occurred during the period covered and, if so, what actions were taken. The responsible official shall certify that such report is true, accurate, and complete and that actions reported were consistent with those specified in the plan.
4. If any action is taken which is inconsistent with the plan, the responsible official shall submit written notification to the Department within seven working days that such actions have been taken. Taking actions inconsistent with those in the plan constitutes a violation of a permit condition and shall be subject to the provisions of Rule 62-213.300, F.A.C.

(m) Compliance Plan Requirements.

1. For each applicable permit condition with which one or more emissions units within a facility is not in compliance at the time of giving notice to the Department of intent to use this general permit and for which that unit has not come into compliance within 30 days after the giving of such notice, the responsible official shall submit to the Department a compliance plan for each such emissions unit. The compliance plan shall contain measurable and enforceable milestones, including specific dates for completion of each milestone. The responsible official shall certify to the Department on a semi-annual basis the progress made achieving compliance.
2. The responsible official shall notify the Department in writing, within 15 days after the date for completion of each milestone, detailing the achievement of compliance, of progress achieved, requirements met or unmet, corrective measures adopted, and an explanation of any measures not met by the completion date for the compliance milestone. The responsible official shall certify that such notice is complete and accurate. Any deviation from the compliance plan shall constitute a violation of the permit condition and shall be subject to the provisions of Rule 62-213.300, F.A.C.

(n) Compliance Certification.

1. For each applicable requirement with which one or more emissions units within a facility is in compliance, the responsible official shall submit a statement certifying such compliance to the Department during the initial notification period of January 15 through March 1, and annually thereafter. The responsible official shall certify each statement as true, accurate, and complete.

2. The statement of compliance shall identify each term or condition of the permit with which the facility has remained in compliance during the period covered by the statement and shall specify the method used to demonstrate compliance. It shall identify each term or condition of the permit with which the facility has not been in continuous compliance during that reporting period.
 3. For those terms or conditions which the facility has not been in continuous compliance during any reporting period, the statement shall include the exact period of non-compliance, actions taken to achieve compliance, and the method used to demonstrate compliance.
- (o) This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C.
- (p) Refrigerant Requirements. Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A, Appendices A and B, which are adopted and incorporated by reference in Rule 62-204.800, F.A.C., shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F, adopted and incorporated in Rule 62-204.800, F.A.C.
1. No person shall knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82, Subpart F.
 2. The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA as required.
- (q) This permit does not authorize any open burning nor does it constitute any waiver of the requirements of Chapter 62-256, F.A.C.
- (r) No person shall circumvent any air pollution control device or allow the emission of air pollutants without the proper operation of all applicable air pollution control devices.
- (s) All reports and notices submitted by the responsible official shall certify that the documentation being submitted is true, accurate, and complete, based upon the information submitted and belief formed after reasonable inquiry.

(3) Definitions. The following words and phrases, when used in this notification form, shall have the following meanings:

- (a) "Ancillary Equipment" - The equipment used with a dry cleaning machine in a dry cleaning system, including emission control devices, pumps, filters, muck cookers, stills, solvent tanks, solvent containers, water separators, exhaust dampers, diverter valves, interconnecting piping, hoses, and ducts.
- (b) "Articles" - Any clothing, garments, textiles, fabrics, and leather goods that are dry cleaned.
- (c) "Area Source" - A perchloroethylene dry cleaning facility which consumes an amount of perchloroethylene less than or equal to 2,100 gallons per year for dry-to-dry machines only, or consumes less than or equal to 1,800 gallons per year and utilizes both dry-to-dry and transfer machines on-site, where the amount of perchloroethylene consumed is determined by purchase receipts in accordance with the requirements of section (6) of this part of the notification form.
- (d) "Biweekly" - Any consecutive 14-day period of time.
- (e) "Carbon Adsorber" - A bed of activated carbon into which an air-perchloroethylene gas-vapor stream is routed and which adsorbs the perchloroethylene.
- (f) "Coin-operated Dry Cleaning Machine" - A dry cleaning machine that is operated solely by the customer.
- (g) "Colorimetric Detector Tube" - A glass tube containing material impregnated with a chemical which visibly reacts to the perchloroethylene in order to allow measurement of the concentration of perchloroethylene in air.

- (h) "Desorption" - The regeneration of a carbon adsorber by removal of the perchloroethylene adsorbed onto the carbon.
- (i) "Diverter Valve" - A flow control device that prevents the flow of air through a refrigerated condenser when the door of the dry cleaning machine is opened.
- (j) "Dry Cleaning" - The process of cleaning articles using petroleum-based or synthetic solvents.
- (k) "Dry Cleaning Cycle" - The washing and drying of articles in a dry-to-dry or transfer machine system.
- (l) "Dry Cleaning Facility" - An establishment with one or more dry cleaning systems.
- (m) "Dry Cleaning Machine" - A dry-to-dry machine or each machine of a transfer machine system.
- (n) "Dry Cleaning Machine Drum" - The perforated container inside the dry cleaning machine that holds articles during the cleaning process.
- (o) "Dry Cleaning System" - A dry-to-dry machine and its ancillary equipment or a transfer machine and its ancillary equipment.
- (p) "Dryer" - A machine used to remove perchloroethylene from articles by tumbling them in a heated air stream (see reclaimer).
- (q) "Dry-to-dry Machine" - A one-machine dry cleaning operation in which washing and drying are performed in the same machine.
- (r) "Exhaust Damper" - A flow control device that prevents the air-perchloroethylene gas-vapor stream from exiting the emission unit into a carbon adsorber before room air is drawn into the dry cleaning machine.
- (s) "Existing" - Dry cleaning facilities or machines which commenced construction or reconstruction or were purchased before December 9, 1991.
- (t) "Filter" - A porous device through which perchloroethylene is passed to remove contaminants in suspension. Examples include lint filter (button trap), cartridge filter, tubular filter, regenerative filter, prefilter, polishing filter, and spin disc filter.
- (u) "Heating Coil" - A device used to heat the air stream recirculated from the dry cleaning machine drum following condensation of perchloroethylene from the air stream and prior to re-entering the dry cleaning machine drum.
- (v) "Large Area Source" - A dry cleaning facility which:
 1. Contains only dry-to-dry machines and consumes between 140 and 2,100 gallons per year of perchloroethylene.
 2. Contains only transfer machines and consumes between 200 and 1,800 gallons per year of perchloroethylene.
 3. Contains both dry-to-dry and transfer machines and consumes between 140 and 1,800 gallons per year of perchloroethylene.
- (w) "Major Source" - A dry cleaning facility which consumes an amount of perchloroethylene exceeding 2,100 gallons per year for dry-to-dry machines only or exceeding 1,800 gallons per year for both dry-to-dry and transfer machines.
- (x) "Muck Cooker" - A device for heating waste material containing perchloroethylene in order to volatilize and recover the perchloroethylene.
- (y) "New" - Dry cleaning facilities or machines which commenced construction or reconstruction or were purchased on or after December 9, 1991.
- (z) "Perceptible Leaks" - Any perchloroethylene vapor or liquid leaks detectable by:
 1. Odor.
 2. Visual observation of pooled liquid or condensation droplets.
 3. Instrument detection of emissions pursuant to the requirements of section (7) of this part.
- (aa) "Perchloroethylene Consumption" - The total volume of perchloroethylene purchased yearly based upon purchase receipts.
- (bb) "Reclaimer" - A machine used to remove perchloroethylene from clothing by tumbling them in a heated air stream.
- (cc) "Reconstruction" - The replacement of a washer, dryer, or reclaimer; or replacement of any components of a dry cleaning system to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new system.

- (dd) "Refrigerated Condenser" - A vapor recovery system into which an air-perchloroethylene gas-vapor stream is routed and the perchloroethylene is condensed by cooling the gas-vapor stream.
- (ee) "Refrigerated Condenser Coil" - The coil containing the chilled liquid used to cool and condense the perchloroethylene.
- (ff) "Responsible Official" - One of the following:
 1. For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.;
 2. For a partnership: a general partner;
 3. For a sole proprietorship: the owner;
 4. For a municipality, state, federal, or other public agency: either a principal executive officer or ranking official.
- (gg) "Room Enclosure" - A stationary structure that encloses a transfer machine system, and is vented to a carbon adsorber or an equivalent control device during operation of the transfer machine system.
- (hh) "Small Area Source" - A dry cleaning facility which:
 1. Contains only dry-to-dry machines and consumes less than 140 gallons per year of perchloroethylene.
 2. Contains only transfer machines and consumes less than 200 gallons per year of perchloroethylene.
 3. Contains both dry-to-dry and transfer machines and consumes less than 140 gallons per year of perchloroethylene.
- (ii) "Source" - Each dry cleaning facility.
- (jj) "Still" - Any device used to volatilize and recover perchloroethylene from contaminated solvent.
- (kk) "Temperature Sensor" - A thermometer or thermocouple used to measure temperature.
- (ll) "Transfer Machine System" - A multiple-machine dry cleaning operation in which washing and drying are performed in different machines. Examples include:
 1. A washer and dryer(s).
 2. A washer and reclaimer(s).
 3. A dry-to-dry machine and reclaimer(s).
- (mm) "Washer" - A machine used to clean articles by immersing them in perchloroethylene. This includes a dry-to-dry machine when used with a reclaimer.
- (nn) "Water Separator" - A device used to recover perchloroethylene from a water-perchloroethylene mixture.
- (oo) "Year or Yearly" - Any consecutive 12-month period of time.

(4) Basic Requirements.

- (a) The responsible official shall determine the eligibility of the facility for this permit and shall submit a completed Part III of this Dry Cleaner Air General Permit Notification Form (DEP Form No. 62-213.900(2)) at least 30 days prior to beginning operation or by September 1, 1996, whichever is later.
- (b) The responsible official shall certify in the initial notification and annually thereafter that the annual consumption of perchloroethylene solvent does not exceed 2,100 gallons per year for dry-to-dry facilities or 1,800 gallons per year for transfer or combination facilities. The annual consumption total shall be based upon purchase receipts and the average shall be recalculated on a monthly basis.
- (c) New facilities shall comply with all applicable requirements upon start-up. Facilities which commenced operation on or before December 9, 1991, shall comply with the control technology requirements listed in section (5) of this part not later than September 22, 1996.
- (d) The operation of transfer cleaning machines purchased after September 22, 1993, is prohibited.
- (e) This permit does not authorize operation of coin-operated dry cleaning units.

(5) Control Technology Requirements. Control technology requirements are based upon the facility's classification as a small or large area source, the type of machine used, and its date of purchase. If the solvent consumption exceeds the source limit for that classification, the facility shall comply with all additional requirements of 40 CFR Part 63, Subpart M, and must apply for a major source permit under Chapter 62-213, F.A.C., within 180 days of that occurrence. The facility shall operate and maintain equipment according to the manufacturer's specifications. The manuals, design specifications, and other instructional materials shall be kept on-site by the responsible official.

(a) General Control Requirements. All facilities shall:

1. Store perchloroethylene in tightly sealed containers which are impervious and chemically unreactive to the solvent.
2. Examine the containers for leakage as required in section (7) of this part of the notification form.
3. Close and secure machine doors except during loading and unloading.
4. Drain cartridge filters in their housing or in sealed containers for a minimum of twenty-four hours.
5. Maintain the solvent-to-carbon ratio and steam pressure for carbon adsorber beds to ensure that stripping occurs according to the manufacturer's specifications.

(b) Process Vent Controls.

1. Existing small area sources do not require process vent controls.
2. New small area sources shall:
 - a. Equip all machines with a refrigerated condenser.
 - b. Equip dry-to-dry machines with a closed-loop vapor venting system.
 - c. Equip the condenser with a diverter valve if airflow will be directed towards the condenser upon opening the door.
 - d. Measure and record the exhaust stream of the outlet on the refrigerated condenser on a weekly basis. The temperature must not exceed 45 degrees Fahrenheit (F).
 - e. Repair or adjust the equipment within twenty-four hours if the exhaust temperature exceeds 45 degrees F. The repair shall be documented as required in section (6) of this part of the notification form.
 - f. Verify the accuracy of the temperature sensor to within plus or minus 2 degrees of the exhaust temperature. The sensor must have a detectable range of at least 32 degrees F to 120 degrees F.
 - g. Conduct all temperature monitoring following an appropriate cooldown period and after verifying that the coolant has been completely charged.
3. Existing large area sources shall:
 - a. Comply with all the requirements listed for new small area sources.
 - b. Equip machines with refrigerated condensers. Machines previously equipped with carbon adsorbers are not required to refit with condensers.
 - c. Measure and record the exhaust temperature on the outlet side of a refrigerated condenser located on dry-to-dry machines, reclaimers, and dryers on a weekly basis as required in section (5)(b)2.d. of this part of the notification form.
 - d. Measure and record the temperature of the washer exhaust at both the inlet and outlet sides of the refrigerated condenser. If the temperature differential is less than 20 degrees F, the equipment shall be repaired or adjusted within twenty-four hours. The repair shall be documented pursuant to section (7) of this part of the notification form.
 - e. Measure and record the concentration of perchloroethylene in the exhaust from the carbon adsorber at a sampling port on a weekly basis using a colorimetric tube and bellows or piston-driven pump or other direct-reading instrumentation. The measurement shall be obtained at the end of the final dry cleaning cycle prior to desorption while the machine is venting to the carbon adsorber. If the concentration of perchloroethylene exceeds 100 parts per million (ppm), the equipment shall be repaired or adjusted within twenty-four hours. The repair shall be documented as required in section (7) of this part of the notification form.

- f. The location of the sampling port for measuring perchloroethylene concentrations in the exhaust duct shall be at least eight duct diameters downstream of any bend, contraction, or expansion, at least two duct diameters upstream from any bend, contraction, or expansion, and no other inlet shall be located downstream from the sampling port.
 - g. Transfer systems shall be equipped with individual condenser coils for dryers, reclaimers, and washers.
 - h. The airflow shall never be routed to bypass the carbon adsorber.
4. New large area sources shall:
- a. Comply with all the requirements listed for existing large area sources.
 - b. Equip all machines with a refrigerated condenser.

(6) Recordkeeping Requirements.

- (a) The responsible official shall maintain the following records in a log kept on-site, for a minimum of five years:
 - 1. All purchase receipts for determination of perchloroethylene solvent consumption.
 - 2. All leak detection inspection and repair reports.
 - 3. All calibration data.
 - 4. All exhaust duct monitoring data on perchloroethylene concentrations.
- (b) On the first business day of the month, the responsible official shall record the total amount of perchloroethylene purchased in the previous month and calculate the total amount purchased in the preceding twelve months, as a measure of perchloroethylene consumption.

(7) Leak Detection Requirements.

- (a) The responsible official must conduct a weekly leak detection and repair inspection of the facility; however, small area sources can conduct the inspection on a biweekly basis. The responsible official shall enter the results of the inspection into the inspection and repair log kept on-site.
- (b) The responsible official shall use one of the following methods to detect leaks:
 - 1. Visual examination of condensed solvent on exterior surfaces.
 - 2. Use of direct-reading instrumentation.
 - 3. Detection of air flow through improperly seated gaskets.
 - 4. Detection of perchloroethylene odors.
- (c) The following items shall be inspected for leaks:
 - 1. Hose and pipe connections, fittings, couplings, and valves.
 - 2. Door gasket seating.
 - 3. Filter gaskets and seating.
 - 4. Pumps.
 - 5. Solvent tanks and containers.
 - 6. Water separators.
 - 7. Muck cookers.
 - 8. Stills.
 - 9. Exhaust dampers.
 - 10. Diverter valves.
 - 11. Cartridge filter housings.
- (d) Leaks shall be repaired within twenty-four hours of detection, unless repair equipment must be ordered.
 - 1. Equipment parts needed to repair the machine shall be ordered within two working days of leak detection.
 - 2. Repair parts shall be installed within five working days of receipt.
- (e) Mechanical direct-reading instrumentation shall be operated as directed by the manufacturer's specifications and must:
 - 1. Detect halogenated hydrocarbon vapor in a concentration range of 0 to 500 ppm.
 - 2. Be calibrated as directed by the manufacturer against a calibrant gas prior to and after each use. Calibration data shall be recorded in the leak detection log.

3. Be inspected for leaks or obvious signs of wear on a weekly basis and kept in a clean and secure area when not in use.
- (f) Colorimetric tubes and bellows or piston-driven pumps shall be operated according to the manufacturer's specifications and shall be verified for accuracy by the use of duplicate samples. The tube should be designed to measure a concentration of 100 parts per million by volume of perchloroethylene in air to an accuracy of +/- 25 parts per million by volume.
- (g) The integrity of all rubber seals on the pump shall be inspected on a weekly basis and all equipment shall be kept in a clean and secure area when not in use.

(8) Local Program Requirements. All facilities located within the borders of Duval County shall comply with the following additional requirements:

- (a) Pursuant to Jacksonville Environmental Board Rule 2.901, no person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor, and
- (b) Pursuant to Jacksonville Ordinance Code Chapter 376, any facility that causes or contributes to the emission of objectionable odors which results in the Air Quality Division (AQD) receiving and validating complaints from five or more different households within a 90-day period may be cited for objectionable odors.

~~FBD 00902~~

X

PERCHLOROETHYLENE DRY CLEANERS

TITLE V GENERAL PERMIT COMPLIANCE INSPECTION CHECKLIST

TYPE OF INSPECTION: ANNUAL COMPLAINT/DISCOVERY
RE-INSPECTION

AIRS ID#: 0210073 DATE: 1-16-97 TIME IN: 10:40 TIME OUT: 11:45

FACILITY NAME: Prima Dry Cleaners

FACILITY LOCATION: 3803 Tamiami Trail E.
NAPLES, FL 33962

PART I: NOTIFICATION

(check appropriate box)

1. Existing facility notified DARM by 9/1/96

2. New facility notified DARM 30 days prior to startup

3. Facility failed to notify DARM to use general permit

PART II: CLASSIFICATION

Facility indicated on notification form that it is:
(check appropriate box)

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) <input type="checkbox"/>	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) <input type="checkbox"/>
3. Existing large area source dry-to-dry only, $140 < x < 2,100$ gal/yr transfer only, $200 < x < 1,800$ gal/yr both types, $140 < x < 1,800$ gal/yr (constructed before 12/9/91) <input checked="" type="checkbox"/>	4. New large area source dry-to-dry only, $140 < x < 2,100$ gal/yr transfer only, $200 < x < 1,800$ gal/yr both types, $140 < x < 1,800$ gal/yr (constructed on or after 12/9/91) <input type="checkbox"/>

This is a correct facility classification Y N

If no, please check the appropriate classification:

facility qualified for a general permit as number _____ above

facility exceeds above limits and is not eligible for a general permit

E. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 350 gallons.

PART III: GENERAL CONTROL REQUIREMENTS

Is the responsible official of the dry cleaning facility:
(check appropriate boxes)

1. Storing perchloroethylene in tightly sealed and impervious containers? *PURPOSE IN* Y N
2. Examining the containers for leakage? Y N
3. Closing and securing machine doors except during loading/unloading? Y N
4. Draining cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? Y N
5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? Y N N/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 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)

1. Equipped all machines with the appropriate vent controls? Y N
2. Equipped dry-to-dry machines with a closed-loop vapor venting system? Y N N/A
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? Y N N/A
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? Y N
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F? Y N
6. Conducted all temperature monitoring after an appropriate cooldown period and after verifying that the coolant had been completely charged? Y N

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? Y N
2. Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly? Y N
Is the temperature differential equal to or greater than 20° F? Y N
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? Y N N/A
Is the perc concentration equal to or less than 100 ppm? Y N
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? Y N N/A
5. Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils? Y N N/A
6. Routed airflow to the carbon adsorber (if used) at all times? Y N N/A

PART V: RECORDKEEPING REQUIREMENTS

Has the responsible official:
(check appropriate boxes)

1. Maintained receipts for perc purchased? Y N
2. Maintained rolling monthly averages of perc consumption? Y N
3. Maintained leak detection inspection and repair reports for the following:
 - a. documentation of leaks repaired w/in 24 hrs? or; Y N
 - b. documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? Y N*no leaks!!*
4. Maintained calibration data? (for direct reading instruments only) Y N N/A
5. Maintained exhaust duct monitoring data on perc concentrations? Y N
6. Maintained startup/shutdown/malfunction plan? Y N
7. Maintained deviation reports? Y N
Problem corrected? Y N
8. Maintained compliance plan, if applicable? Y N N/A

PART VI: LEAK DETECTION AND REPAIRS

1. Does the responsible official conduct a weekly leak detection and repair inspection? Y N

2. Which method of detection is used by the responsible official?

- Visual examination (condensed solvent on exterior surfaces)
- Physical detection (airflow felt through gaskets) *+*
- Odor (noticeable perc odor) *Detector*
- Use of direct-reading instrumentation (FID/PID/calorimetric tubes)

If using direct-reading instrumentation, is the equipment:

- a. Capable of detecting perc vapor concentrations in a range of 0-500 ppm? Y N
- b. Calibrated against a standard gas prior to and after each use (PID/FID only)? Y N
- c. Inspected for leaks and obvious signs of wear on a weekly basis? Y N
- d. Kept in a clean and secure area when not in use? Y N
- e. Verified for accuracy by use of duplicate samples (calorimetric only)? Y N

3. Has the facility maintained a leak log? Y N

4. Does the responsible official check the following areas for leaks? *NOT DOCUMENTED*

- | | | | |
|---------------------------------------------------|------------------------------------------------------------------|---------------------------|------------------------------------------------------------------|
| Hose connections, fittings, couplings, and valves | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Muck cookers | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| Door gaskets and seating | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Stills | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| Filter gaskets and seating | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Exhaust dampers | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| Pumps | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Diverter valves | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| Solvent tanks and containers | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Cartridge filter housings | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| Water separators | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | | |

HEINZ KURTH

Name of Responsible Official

Wayne Lewis

Inspector's Name (Please Print)

Wayne Lewis

Inspector's Signature

1-16-97

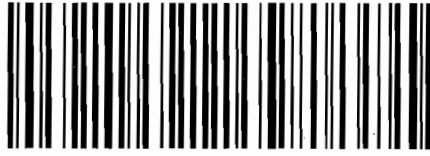
Date of Inspection

? 1-98

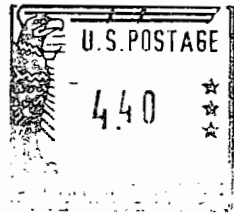
Approximate Date of Next Inspection

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
MS 5510-37550 304000
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-2400

CERTIFIED MAIL



7000 2870 0000 7027 3872



RETURN TO
SENDER
**NOT DELIVERABLE
AS ADDRESSED
UNABLE TO FORWARD**

*For
AD/K
1/4/02*

10 AIRS ID # 0210073001AG
HEINZ KURTH
TOWN CENTER CLEANERS
15306 PEMBROKE POINT AUDUBON CC
NAPLES FL 34110

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by (Please Print Clearly)	B. Date of Delivery
1. Article Addressed to:	C. Signature	
10 AIRS ID # 0210073001AG HEINZ KURTH TOWN CENTER CLEANERS 15306 PEMBROKE POINT AUDUBON CC NAPLES FL 34110	<input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee	
	D. Is delivery address different from item 1? If YES, enter delivery address below:	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	3. Service Type	
	<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Copy from service label)		
70002870 0000 7027 3872		
PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789		

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage \$ Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total	<div style="text-align: center; font-size: 2em; font-family: cursive;">Receipt</div> <div style="text-align: center; font-size: 0.8em;">Postmark Here</div>
Sent 10 AIRS ID # 0210073001AG Street HEINZ KURTH 15306 PEMBROKE POINT AUDUBON CC City, St NAPLES FL 34110	
PS Form 3800, May 2000 See Reverse for Instructions	

THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

0392390

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

TOTAL AMOUNT DUE: \$50.00

Do NOT Remove Label

AIRS ID # 0210078

EAGLE CREEK DRYCLEANERS
JOHN W RODGERS
5580 CYNTHIA LANE
NAPLES FL 34112

FOR GOVERNMENT USE ONLY
Org.: 37550101000 EO: B1
Fund: 20-2-035001
Obj.: 002273

RECEIVED
MAIL ROOM
FEB 21 09

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

AIRS ID 0210073

PRIMA DRY CLEANERS INC
HEINZ KURTH
15306 PEMBROKE POINT AUDUBON CC
NAPLES FL 34110

4a. Article Number

Z 333 660 295

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

2-14-98

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X

[Handwritten Signature]

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

Z 333 660 295

US Postal Service

Receipt for Certified Mail

AIRS ID 0210073

PRIMA DRY CLEANERS INC
HEINZ KURTH
15306 PEMBROKE POINT AUDUBON CC
NAPLES FL 34110

PS Form 3800, April 1995

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
 2. Restricted Delivery
 Consult postmaster for fee.

3. Article Addressed to:
 AIRS ID# 0210073
 PRIMA DRY CLEANERS INC
 HEINZ KURTH
 15306 PEMBROKE POINT AUDUBON CC
 NAPLES, FL 34110

4a. Article Number
 2 333 613 395

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 4-9-98

Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Addressee or Agent)

PS Form 3811, December 1994 102595-97-B-0179 Domestic Return Receipt

Thank you for using Return Receipt Service.

Z 333 613 395

US Postal Service
Receipt for Certified Mail
 AIRS ID# 0210073
 PRIMA DRY CLEANERS INC
 HEINZ KURTH
 15306 PEMBROKE POINT AUDUBON CC
 NAPLES FL 34110

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995