

PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE:	ANNUAL (INS1, INS2)	\boxtimes	COMPLAINT/DISCOV
	RE-INSPECTION (FUI)		ARMS COMPLAINT N

COMPLAINT/DISCOVERY (CI)

ARMS COMPLAINT NO: [
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AIRS ID#: 103 0318	Date: 1/24/2012 Time In: 11:00AM Time Out: 11:30AM		
Facility Name:	Fashion Cleaners & Shirt Laundry, Inc.		
Facility Location:	1152 Court Street		
	Clearwater, FL, 33756		
Responsible Official:	Michael Song Phone No: 727-461-1137		
	New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union		
Emis. Unit Description:	2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is	S	
	on-site.		
Permit Number:	1030318-004-AG Exp. Date: 8/21/2016		
Facility Contact:	Michael Song Phone: 727-461-1137		
Compliance Status:	\square IN \square MNC \square SNC		
PART I: NOTIFICATIO	N (Check appropriate box)		
1. Existing facility notified	d DARM by 9/1/96		
2. New facility notified DA	ARM 30 days prior to startup		
3. Facility failed to notify	DARM to use general permit		
PART II: CLASSIFICAT	ΓΙΟΝ		
Facility indicated on notification form that it is: No Notification Form Drop-Off Store Out of business Petroleum Solvent Only A. 1. Existing small area source 2. New small area source 			
Dry-to-dry only, x <140 gal/yr			
Dry-to-dry only, $140 > x < 2,100$ gal/yrDry-to-dry only, $140 > x < 2,100$ gal/yrTransfer only, $200 > x < 1,800$ gal/yrTransfer only, $200 > x < 1,800$ gal/yrBoth types, $140 > x < 1,800$ gal/yrBoth types, $140 > x < 1,800$ gal/yr(Constructed before 12/9/91)(Constructed on or after 12/9/91)			
 This is a correct facility classification			

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?	$\boxtimes \mathbf{Y}$	\Box N	\Box NA	
2. Examining the containers for leakage?	$\boxtimes \mathbf{Y}$	\Box N	□ NA	
 Closing and securing machine doors except during loading/unloading? Draining cartridge filters in their housing or in sealed containers for at 	$\boxtimes Y$	\Box N	□ NA	
least 24 hours prior to disposal?	$\boxtimes \mathbf{Y}$	\Box N	□ NA	
5. Maintaining solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications?	□ Y	□N	🖂 NA	

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). A Carbon adsorber must have been installed prior to September 22, 1993.

If classification (4) has been checked, 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 are	ea sources: (check appropriate boxes)
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1. Equipped all machines with the appropriate vent controls?	$\boxtimes \mathbf{Y}$	□ N	\Box NA
2. Equipped dry-to-dry machines with a closed-loop vapor venting system?	⊠ Y	□N	□ NA
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door?	⊠ Y	□N	□NA
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis?	⊠ Y	□ N	□ NA
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F?	□ Y	□N	⊠ NA
6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged?	⊠ Y	□ N	□ NA

B.	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 terr weekly? Is the temperature differential equal to on $^{\circ}F$?	□Y □N □NA □Y □N □NA		
3.	Measured and recorded the concentration received with a carbon art for received are equipped or less the ppm? Assured that the source or less the ppm?	□Y □N □NA □Y □N □NA		

	concentrations is at least 8 duct diameters downstream of any bend, contraction, or expansion; is at least 2 dust diameters upstream from any bend contraction, or expansion; and downstream from no other inlet?	□y □n □na
5.	Equipped transfer machines (dryers, reclaimers, and washers) with individual condenser coils?	□y □n □na
6.	Routed airflow to the carbon adsorber (if used) at all times?	□Y □N □NA

PART V: RECORDKEEPING REQUIREMENTS			
Has the responsible official: (Check appropriate boxes)			
1.	Maintained receipts for perc purchased?	$\square Y \square N$	
2.	Maintained rolling monthly averages of perc consumption?	$\boxtimes Y \square N$	
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?	$ \begin{array}{c c} \Box Y & \Box N & \boxtimes NA \\ \Box Y & \Box N & \boxtimes NA \end{array} $	
4.	Maintained calibration data? (direct reading instruments only)	$\Box Y \Box N \boxtimes NA$	
5.	Maintained exhaust duct monitoring data on perc concentrations?	$\Box Y \Box N \boxtimes NA$	
6.	Maintained startup/shutdown/malfunction plan?	$\boxtimes Y \square N$	
7.	Maintained deviation reports? Problem corrected?	$ \begin{array}{c c} \Box Y & \Box N & \boxtimes NA \\ \Box Y & \Box N & \boxtimes NA \end{array} $	
8.	Maintained compliance plan, if applicable?	$\Box Y \Box N \boxtimes NA$	

PART VI: LEAK DETECTION AND REPAIRS

1.	Does the responsible official conduct weekly le	ak det	tection	and repair inspection?	$\boxtimes \mathbf{Y}$	□N
2.	Which method of detection does the responsible	le offic	cial use	?	$\boxtimes \mathbf{Y}$	□N
	Visual examination (condensed solvent of	exteri	or surfa	aces)	$\boxtimes \mathbf{Y}$	□N
	Physical detection (airflow felt through ga	skets)			$\boxtimes \mathbf{Y}$	□N
	Odor (noticeable perc odor)			$\boxtimes \mathbf{Y}$	□N	
	Use of direct-reading instrumentation (FII	D/PID/	calorin	netric tubes)	$\Box Y$	$\boxtimes N$
	If using direct-reading instrumentation, is the	equip	ment:		ΠY	$\Box N$
	a. Capable of detecting perc vapor concen	tration	s in a r	ange of 0-500 ppm	ΠY	$\Box N$
	b. Calibrated against a standard gas prior t	to and	after ea	ach use (PID/FID only).	ΠY	$\Box N$
	c. Inspected for leaks and obvious signs of wear on a weekly basis?			ΠY	$\Box N$	
	d. Kept in a clean and secure area when not in use.			ΠY	$\Box N$	
	e. Verified for accuracy by use of duplicat	e samp	ples (ca	lorimetric only)?	ΠY	ΠN
3.	Has the facility maintained a leak log?				$\boxtimes \mathbf{Y}$	□N
4.	The following area should be checked for leaks	s by th	e oper	ator:	$\boxtimes \mathbf{Y}$	□N
	Hose connections, fitting couplings, and valves	$\boxtimes \mathbf{Y}$	□N	Muck cookers	$\Box Y$	$\boxtimes N$
	Door gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Stills	$\boxtimes \mathbf{Y}$	□N
	Filter gaskets and seating	$\boxtimes \mathbf{Y}$	□N	Exhaust dampers	$\boxtimes \mathbf{Y}$	□N
	Pumps	$\boxtimes \mathbf{Y}$	□N	Diverter valves	ΠY	$\boxtimes N$
	Solvent tanks and containers	$\boxtimes \mathbf{Y}$	□N	Cartridge Filter housing	$\boxtimes \mathbf{Y}$	$\Box N$
	Water separators	$\boxtimes \mathbf{Y}$	□N			

Shea Jackson	January 24, 2012
Inspector's Name (Please Print)	Date of Inspection
	Within one year of this inspection
Inspector's Signature	Date of Next Inspection

System Inspection and Leak Detection

Are the following dry cleaning system components inspected weekly for perceptible leaks (sight, smell or touch) while the system is in operation (§63.322(k))? (Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspection of perceptible leaks.) \boxtimes Y \square N \square NA

Are the following dry cleaning system components inspected monthly for vapor leaks using a halogenated hydrocarbon detector or PCE gas analyzer while the system is in operation? (Any inspection conducted according to this paragraph shall satisfy the requirements to conduct an inspection for perceptible leaks under §63.322(k) or (l). \boxtimes Y \square N \square NA

- (1) Hose and pipe connections, fittings, couplings, and valves;
- (2) Door gaskets and seatings;
- (3) Filter gaskets and seatings;
- (4) Pumps;
- (5) Solvent tanks and containers;
- (6) Water separators;
- (7) Muck cookers;
- (8) Stills;
- (9) Exhaust dampers;
- (10) Diverter valves; and
- (11) All Filter housings

Is the halogenated hydrocarbon detector or PCE gas analyzer operated according to the manufacturer's instructions? \boxtimes Y \square N \square NA

Is the vapor leak inspection conducted by placing the probe inlet at the surface of each component interface where leakage could occur and moving it slowly along the interface periphery? $\boxtimes Y \quad \Box N \quad \Box NA$

Is the PCE gas analyzer a flame ionization detector, photo ionization detector, or infrared analyzer capable of detecting vapor concentrations of PCE of 25 parts per million by volume? $\Box Y \quad \Box N \quad \boxtimes NA$

Is the halogenated hydrocarbon detector capable of detecting vapor concentrations of PCE of 25 parts per million by volume and indicating a concentration of 25 parts per million by volume or greater by emitting an audible or visual signal that varies as the concentration changes? $\boxtimes Y \quad \Box N \quad \Box NA$

ADDITIONAL SITE INFORMATION

Facility Name:Fashion Cleaners & Shirt Laundry, Inc.ARMS #:103 0318

Inspection Comments:

- I met with the facility responsible official, Mr. Song, for this inspection.
- I observed the Union L8602000 dryer in operation at time of inspection. Clothes were removed and another cycle was started. There were no Perc odors detected during the observations of the machine during operations.
- There is a second dry to dry machine, a Fluomatic- BT37. This machine has been permanently shutdown. It does not contain Perc and has not been operational since October 2005 due to the condenser leaks. The machine's perchloroethylene reservoir is empty. Mr. Song stated he will be having it removed when economically possible. Note this is stated every year.
- Mr. Song is using the Phoenix Perchloroethylene vendor's record calendar for keeping the temperature and leak observation checks. I reviewed the 2011 and 2012 calendar records they were up to date with last observation of January 23, 2012.
- Mr. Song is recording temperatures and leak check observations and the perchloroethylene usage of the Union 2002 dry cleaning machine only.
- Mr. Song's observations of the cool down cycle temperatures readings ranged from 31°F 36°F for the 2011 and 2012 year.
- The highest Perc monthly total was 33.29 gallons for month of January 2012.
- The most recent P.O. purchase was dated 2/21/2011 for 19.30 gallons. (See photos)
- The hazardous waste invoice showed the most recent disposal to be on 1/4/2012 for 150 lbs of Perc waste. The hazardous waste receptacle was in place on secondary containment receptacle next to the Union dry to dry machine. (See photos)
- The additional waste receptacles were observed as in secondary containment in the outside boiler room area. (See photo)
- The Fulton 30 HP boiler is located in adjacent room on the north side of the facility. (See photo)
- Mr. Songs uses a Tif XL 1A Halogen detector to check the equipment for leaks. The detector was located at the rear of the dry to dry machine. Mr. Song turned on and showed was functional. There were no Perc leaks detected during inspection of equipment.
- I left Mr. Song copies of the P2 pamphlet, and discussed the use of Drysolv and Fabrisolv for alternative for Perc usage. Mr. Song stated he is considering the use of the Hydrocarbon solvents.
- I gave Mr. Song the inspection summary. This facility is considered to be in compliance at this time.

ADDITIONAL SITE INFORMATION

Facility Name:Fashion Cleaners & Shirt Laundry, Inc.ARMS #:103 0318

Machine #1:					
Manufacturer Union 2000 Capacity	lbs				
Model# Serial#	Mfg yr	2002			
L8602000					
Machine #2: Fluomatic BT37					
Manufacturer Capacity	lbs				
Model# Serial#	Mfg yr	1996			
Notification (unpermitted sources only):					
1. Was the facility assisted in filling out the notification by the inspector?	ΠY	⊠N			
2. Did the facility insist on filling out its own notification, and will send it to FDEP?	ΠY	⊠N			
Record keeping :					
1. Does facility have statement/specs as to the design accuracy of the temperature sensor?	⊠Y	□N			
(Temperature of 45° F w/accuracy +/- 2° F, or 7.2EC w/accuracy of +/- 1.1°C)					
Hazardous Waste:					
1. Is all perc. contaminated wastewater either treated or disposed of properly?	⊠Y				
2. If wastewater is evaporated, is it an approved system, and using carbon filtration?	⊠Y				
3. Does the facility have secondary containment for the dry-dry machine?	⊠Y				
4. Does the facility have secondary containment for any perc. waste containers? \square N					
Boiler:					
Manufacturer Fulton	Нр				
Model # F8-030-A Serial # 1030668	Mfg yr	2007			
Fuel Type: Natural gas? ⊠ Propane? □ Fuel oil? □					
Comments: Boiler is Exempt					
	I				

1152 Court Street, Clearwater



Project Id:	<u>80736</u>	Permit No: 1030318-004-AG	Arms Number:	
Inspector:	Shea Jackson	Inspection Date / Time: <u>1/24/</u>	2012 /	
Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union				
2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler				
	is on-site.			

Description: [The union dry to dry machine was in operation at this time.]

1152 Court Street, Clearwater



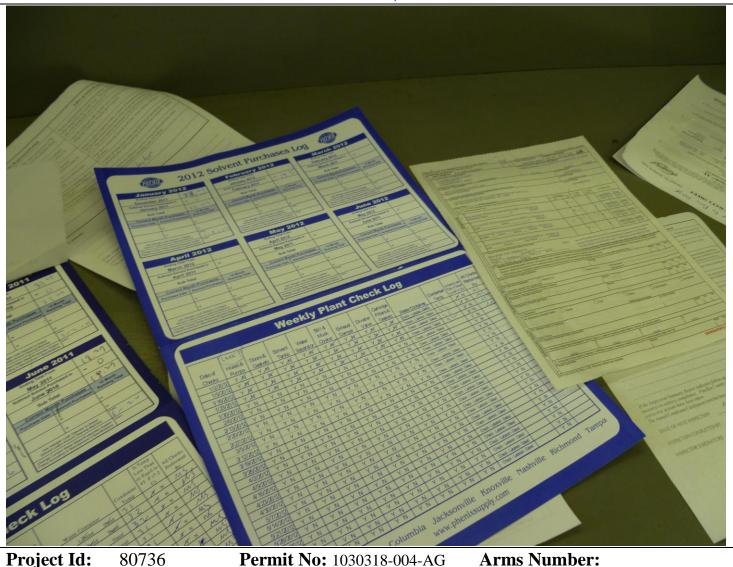
 Project Id:
 80736
 Permit No: 1030318-004-AG
 Arms Number:

 Inspector:
 Shea Jackson
 Inspection Date / Time: 1/24/2012 / _____

 Source (EU):
 New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.

Description: [The rear of machine, no Perc odors or leaks detected. Containers are closed and lined for easy clean up and Hazardous waste disposal.]

1152 Court Street, Clearwater



Inspector: <u>Shea Jackson</u> Inspection Date / Time: <u>1/24/2012</u> / _____

Source (EU): New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.

Description: [The 2011 and 2012 records for leak and temperature observations, with purchase orders and hazardous waste invoices.]

1152 Court Street, Clearwater



 Project Id:
 80736
 Permit No: 1030318-004-AG
 Arms Number:

 Inspector:
 Shea Jackson
 Inspection Date / Time: 1/24/2012 / _____

 Source (EU):
 New, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (Union 2002) with a refrigerated condenser. An exempt 30 HP natural gas fired boiler is on-site.

Description: [The hazardous waste drums in secondary containment located in outside storage area.]