



Florida Department of Environmental Protection

Northwest District Branch Office
630-3 Capital Circle NE
Tallahassee, Florida 32301

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 7, 2010

Phil Gorgas
Concord Custom Cleaners #019
Post Office Box 55910
Lexington, Kentucky 40555

Dear Mr. Gorgas:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The permit **expires August 10, 2011**. The program identification number for this facility is **0730084**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the inspection results, the Tallahassee Branch Office reported a facility status of In Compliance. Note that your compliance status may be subject to further review by the District Program Office.

In order to complete the yearly inspection process, the enclosed "Annual Compliance Certification Form" will also have to be submitted. Please fill out your relevant sections of the form, including the Annual Reporting Period. The last recorded end date on your previously submitted form appears to be 12/31/2009.

The assistance you provided is appreciated. The inspection checklist and its comments section are enclosed. If you have any questions, your local contact is Tracy White at (850) 488-3704 or tracy.a.white@dep.state.fl.us.

Sincerely,

Marlane Castellanos
Branch Manager

MC/tw
Enclosures

cc: Rick Bradburn; Mary Beth Curle; Erica Mitchell (FDEP, Pensacola)



PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST



INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐
RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0730084 DATE: 3/30/2010

ARRIVE: 2:00 P.M.

DEPART: _____

FACILITY NAME: CONCORD CUSTOM CLEANERS #019

FACILITY LOCATION: 2910 Kerry Forest Pkwy

TALLAHASSEE 32309-6892

OWNER/AUTHORIZED REPRESENTATIVE: PHIL GORGAS

PHONE: (859)422-4800

CONTACT NAME:

PHONE:

ENTITLEMENT PERIOD: 8/10/2006 / 8/10/2011
(effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check ☒ only one box)

☒ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE

PART II: FACILITY CLASSIFICATION - Rule 62-213.300 FAC

(check ☒ only one box in A)

A. 1. Existing small area source ☐

dry-to-dry only, $x < 140$ gal/yr
transfer only, $x < 200$ gal/yr
both types, $x < 140$ gal/yr
(constructed before 12/9/91)

2. 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)

3. Existing large area source ☒

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 ☐

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. Ineligible for General Permit ☐

drop store/out of business/petroleum
facility exceeds above limits

B. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 150 gallons.

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC

(check ☒ only one box
for each question)

Does the responsible official of the dry cleaning facility:

1. Store perc, and wastes containing perc, in tightly sealed & impervious containers? ☒ Yes ☐ No ☐ N/A
2. Examine the containers for leakage? ----- ☒ Yes ☐ No ☐ N/A
3. Close and secure machine doors except during loading/unloading? ----- ☒ Yes ☐ No
4. Drain cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? ----- ☐ Yes ☐ No ☒ N/A
5. Maintain solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? ----- ☐ Yes ☐ No ☒ N/A

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC

(Refer to Part II-A.1.-4. Classification: page 1 of 4, this form)

1. If the facility classification is a Existing small area source, no controls are required. **Proceed to Part V.**
2. If the facility classification is a New small area source, the machine should be equipped with a refrigerated condenser. **Complete section A. below.**
3. If the facility classification is a Existing large area source, the machine should be equipped with either a refrigerated condenser or a carbon adsorber. **Complete both sections A and B below.** *Carbon adsorber must have been installed prior to September 22, 1993*
4. If the facility classification is a New large area source, the machine should be equipped with a refrigerated condenser. **Complete both sections A and B below.**

A. Has the responsible official of all existing large area & new sources:

(check ☒ only one box for
each question)

1. Equipped all machines with the appropriate vent controls? ----- ☒ Yes ☐ No
2. Equipped dry-to-dry machines with a closed-loop vapor venting system? ----- ☒ Yes ☐ No ☐ N/A
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? ----- ☒ Yes ☐ No ☐ N/A
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? ----- ☒ Yes ☐ No
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F? ----- ☐ Yes ☐ No ☒ N/A
6. Conducted all temperature monitoring after an appropriate cool-down period and after verifying that the coolant had been completely charged? ----- ☒ Yes ☐ No

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)

B. Does the responsible official of an existing large or new large area source also:

(check ☒ only one box for each question)

1. Measure and record the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis? ----- ☒ Yes ☐ No
2. Measure and record the washer exhaust temperature at the condenser inlet and outlet weekly? ----- ☐ Yes ☐ No ☒ N/A
 - a) Is the temperature differential equal to, or greater than 20° F? ----- ☐ Yes ☐ No ☒ N/A
3. Measure and record the perc concentration in the exhaust stream weekly at the end of the final drying cycle while the machine is venting to the adsorber, if machines are equipped exclusively with a carbon adsorber? ----- ☐ Yes ☐ No ☒ N/A
 - a) Is the perc concentration equal to, or less than 100 ppm? ----- ☐ Yes ☐ No ☒ N/A
4. Assure that the sampling port on the carbon adsorber exhaust for measuring perc concentrations is at least 8 duct diameters downstream of any bend, contraction, or expansion; is at least 2 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet? ----- ☐ Yes ☐ No ☒ N/A
5. Equip transfer machines (dryers, reclaimers, and washers) with individual condenser coils? ----- ☐ Yes ☐ No ☒ N/A
6. Route airflow to the carbon adsorber (if used) at all times? ----- ☐ Yes ☐ No ☒ N/A

PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC

Does the responsible official:

(check ☒ only one box for each question)

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

PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC

(check ☒ only one box for each question)

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

detection and repair inspection? -----

☒ Yes ☐ No

2. Does the facility maintain a leak log? -----

☒ Yes ☐ No

3. Does the responsible official check the following areas for leaks?

a) Hose connections, fittings,

couplings, and valves -----

☒ Yes ☐ No ☐ N/A

g) Muck cookers -----

☐ Yes ☐ No ☒ N/A

b) Door gaskets and seating -----

☒ Yes ☐ No ☐ N/A

h) Stills -----

☒ Yes ☐ No ☐ N/A

c) Filter gaskets and seating -----

☒ Yes ☐ No ☐ N/A

i) Exhaust dampers -----

☐ Yes ☐ No ☒ N/A

d) Pumps -----

☒ Yes ☐ No ☐ N/A

j) Diverter valves -----

☒ Yes ☐ No ☐ N/A

e) Solvent tanks and containers --

☒ Yes ☐ No ☐ N/A

k) Cartridge filter housings

☒ Yes ☐ No ☐ N/A

f) Water separators -----

☒ Yes ☐ No ☐ N/A

4. Which method(s) of detection (is/are) used by the responsible official?

a) Visual examination (condensed solvent on exterior surfaces) -----

a) ☒

b) Physical detection (airflow felt through gaskets) -----

b) ☒

c) Odor (noticeable perc odor) -----

c) ☒

d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) -----

d) ☐ ** (see below)

e) Halogen leak detector -----

e) ☒

**If using direct-reading instrumentation, is the equipment: -----

** ☒ N/A

1) Capable of detecting perc vapor concentrations in a range of 0-500 ppm? -----

1) ☐ Yes ☐ No

2) Calibrated against a standard gas prior to and after each use (PID/FID only)? -----

2) ☐ Yes ☐ No

3) Inspected for leaks and obvious signs of wear on a weekly basis? -----

3) ☐ Yes ☐ No

4) Kept in a clean and secure area when not in use? -----

4) ☐ Yes ☐ No

5) Verified for accuracy by use of duplicate samples (calorimetric only)? -----

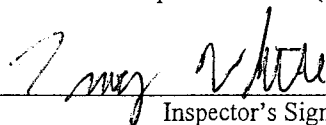
5) ☐ Yes ☐ No

Tracy White

3/30/2010

Inspector's Name (Please Print)

Date of Inspection



Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: I met with Pam Murray, Assistant Store Manager. Year 2009-10 records and Perc receipts were available for inspection. Leak checks w/ the PCE leak detector were also recorded. No problems were noted. The machine (VIC 1250 F/S) was in operation. No problems were noted.

**DRY CLEANER AIR QUALITY GENERAL PERMIT
ANNUAL COMPLIANCE CERTIFICATION FORM****FACILITY NAME:** _____ **DATE:** _____**FACILITY LOCATION:** _____

Annual Reporting Period: _____ 20____ TO _____ 20____

Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement. ☐ YES ☐ NO

If NO, complete the following:

#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from _____ to _____

Action(s) taken to achieve compliance: _____

Method used to demonstrate compliance: _____

#2. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from _____ to _____

Action(s) taken to achieve compliance: _____

Method used to demonstrate compliance: _____

As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, my annual consumption of perchloroethylene solvent, based upon purchase receipts, does not exceed 2,100 gallons per year for dry-to dry facilities or 1,800 gallons per year for transfer or combination facilities.

RESPONSIBLE OFFICIAL: _____

Name (Please Print)

Signature

Date

*This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.