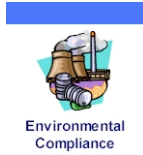




# PERCHLOROETHYLENE DRY CLEANERS



## COMPLIANCE INSPECTION CHECKLIST

**INSPECTION TYPE:** ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   
 RE-INSPECTION (FUI)  ARMS COMPLAINT NO: \_\_\_\_\_

<b>AIRS ID#:</b> 103 0459	<b>Date:</b> 10/27/2008 <b>Time In:</b> 1:20PM <b>Time Out:</b> 2:00PM
<b>Facility Name:</b>	Hi Tech Cleaners & Laundry, Inc.
<b>Facility Location:</b>	5523 Roosevelt Blvd. Clearwater, FL, 33760
<b>Responsible Official:</b>	In Taek Ma <b>Phone No:</b> 727-536-1288
<b>Emis. Unit Description:</b>	New Large Multi Matic L40, Serial No. 40SL-Ri-0807-7572 Dry-to-dry machine (2007)
<b>Permit Number:</b>	1030459-002-AG <b>Exp. Date:</b> 7/18/09
<b>Facility Contact:</b>	In Taek Ma <b>Phone:</b> 727-536-1288
<b>Compliance Status:</b>	<input type="checkbox"/> IN <input checked="" type="checkbox"/> MNC <input type="checkbox"/> SNC

**PART I: NOTIFICATION** (Check appropriate box)

1. Existing facility notified DARM by 9/1/96	<input type="checkbox"/>
2. New facility notified DARM 30 days prior to startup	<input type="checkbox"/>
3. Facility failed to notify DARM to use general permit	<input type="checkbox"/>

**PART II: CLASSIFICATION**

**Facility indicated on notification form that it is:**  
 No Notification Form     Drop-Off Store     Out of business     Petroleum Solvent Only

**A.**

<u>1. Existing small area source</u> Dry-to-dry only, x <140 gal/yr Transfer only, x <200 gal/yr Both types, x <140 gal/yr (Constructed before 12/9/91)	<input type="checkbox"/>	<u>2. New small area source</u> Dry-to-dry only, x <140 gal/yr Transfer only, x <200 gal/yr Both types, x <140 gal/yr (Constructed on or after 12/9/91)	<input type="checkbox"/>
<u>3. Existing large area source</u> 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 type="checkbox"/>	<u>4. New large area source</u> 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 checked="" type="checkbox"/>

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

**B. Highest 12-month consecutive total of perchloroethylene purchased in the preceding 12-month period:** 265 Gallons. *This is the last and Highest Perc total in records as of 12/31/2007*

### 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 checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA            |
| 2. Examining the containers for leakage?  | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA            |
| 3. Closing and securing machine doors except during loading/unloading?  | <input checked="" 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 checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> NA            |
| 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 checked="" type="checkbox"/> 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 area sources:** (check appropriate boxes)

- |  |                                       |                                       |  |
|--|---------------------------------------|---------------------------------------|--|
| 1. Equipped all machines with the appropriate vent controls?   | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N            |  |
| 2. Equipped dry-to-dry machines with a closed-loop vapor venting system?   | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N            | <input type="checkbox"/> NA            |
| 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 checked="" type="checkbox"/> NA |
| 4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis?                       | <input type="checkbox"/> Y            | <input checked="" type="checkbox"/> N |  |
| 5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45o F?                          | <input type="checkbox"/> Y            | <input type="checkbox"/> N            | <input checked="" type="checkbox"/> NA |
| 6. Conducted all temperature monitoring after an appropriate cool down period and after verifying the coolant had been completely charged? | <input checked="" 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. <i>Mr. Taek Ma stated he was checking the temperature weekly and was ranging 20 degrees and lower sometimes 19 degrees F. But he did not make a record of temperature from 1/1/2008 – 10/27 2008.</i> | <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N                             |
| 2. Measured and recorded the washer exhaust temperature at the condenser inlet and outlet weekly? Is the temperature differential equal to or greater than 20° F? ( <b>Transfer Washer Machine only</b> )  | <input type="checkbox"/> Y | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 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? Is the perc concentration equal to or less than 100 ppm?  | <input type="checkbox"/> Y | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 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?   | <input type="checkbox"/> Y | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 5. Equipped <b>transfer machines</b> (dryers, reclaimers, and washers) with individual condenser coils?  | <input type="checkbox"/> Y | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 6. Routed airflow to the carbon adsorber (if used) at all times?   | <input type="checkbox"/> Y | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
|  | <input type="checkbox"/> Y | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |

**PART V: RECORDKEEPING REQUIREMENTS**

**Has the responsible official:**

(Check appropriate boxes)

- |  |                                       |   |
|--|---------------------------------------|---|
| 1. Maintained receipts for perc purchased?   | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N  |
| 2. Maintained rolling monthly averages of perc consumption?  | <input type="checkbox"/> Y            | <input checked="" type="checkbox"/> N                             |
| 3. Maintained leak detection inspection and repair reports for the following:  |                                       |   |
| a. Documentation of leaks repaired w/in 24 hrs? or;  | <input type="checkbox"/> Y            | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| b. Documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? | <input type="checkbox"/> Y            | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 4. Maintained calibration data? ( <i>direct reading instruments only</i> )   | <input type="checkbox"/> Y            | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 5. Maintained exhaust duct monitoring data on perc concentrations?   | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N  |
| 6. Maintained startup/shutdown/malfunction plan?   | <input type="checkbox"/> Y            | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 7. Maintained deviation reports?   | <input type="checkbox"/> Y            | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| Problem corrected?   | <input type="checkbox"/> Y            | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |
| 8. Maintained compliance plan, if applicable?  | <input type="checkbox"/> Y            | <input type="checkbox"/> N <input checked="" type="checkbox"/> NA |

**PART VI: LEAK DETECTION AND REPAIRS**

1. Does the responsible official conduct a weekly leak detection and repair inspection?  Y  N  
*Mr. and Mrs. Taek Ma stated he was performing leak checks with new detector, but had not recorded check performance.*
2. Which method of detection does the responsible official use?  Y  N
- Visual examination (condensed solvent of exterior surfaces)
  - Physical detection (airflow felt through gaskets)
  - Odor (noticeable perc odor)
  - Halogen detector usage - TIF 5050A Halogen Detector.  Y
  - Use of direct-reading instrumentation (FID/PID/calorimetric tubes)  Y
- If using direct-reading instrumentation, is the equipment:**  Y  N
- 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. The following area should be checked for leaks by the inspector:  Y  N
- |   |  |                          |  |
|---|--|--------------------------|--|
| Hose connections, fitting couplings, and valves | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Muck cookers             | <input type="checkbox"/> Y <input checked="" 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 type="checkbox"/> Y <input checked="" type="checkbox"/> N |
| Solvent tanks and containers                    | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Cartridge Filter housing | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| Water separators                                | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |                          |  |

Shea Jackson

10/27/2008

Inspector=s Name (Please Print)

Date of Inspection

Inspector=s Signature

Within one year of this inspection

Date of Next Inspection

## ADDITIONAL SITE INFORMATION

**Facility Name:** Hi Tech Cleaners & Laundry, Inc.  
**ARMS #:** 103 0459

- I performed an annual compliance inspection of this facility, and met with the responsible official, Mr. Taek Ma, and his wife and Mrs. Ma.
- I reviewed the 2007 calendar records, with them. They did not have the calendar records for 2008. She stated she had not received the calendar. I informed them that I had spoken to them last year about the calendar would no longer be issued and would need to record in their own calendar, or down load from the DEP internet site. The last record of Temperature, leak checks and Perc usage were recorded for the last week of December 2007.
- I gave Mr. And Mrs. Ma the handouts for the web site for the calendar. Mrs. Ma stated she had tried to go on the computer and download the calendar for 2008, and had problems. I told her she should have contacted our department or could have kept a blank check off list from her 2007 to use with a regular calendar. I explained they could go to Fed Ex and get copy of calendar made there. I gave them the Fed Ex handout and circled the nearest location to their shop off Ulmerton.
- I asked if there had been any maintenance issues or equipment breakdowns, Mr. Ma stated that they had no problem because is new machine.
- They were able to show one Purchase order #6838 invoice for Perc on 3/12/2008 for the purchase of 10 gallons. Mrs. Taek Ma stated she had ordered a Perc purchase for this Wednesday of another 10 gallons for 10/29/2008. Mr. Ma stated the previous machine had been drained into his new dry to dry, when they purchased the new machine in 2006. He stated that is why they had not had to purchase much Perc this year or last. They also stated the business had been very slow. I informed Mr. and Mrs. Ma, they had to keep the purchases recorded in the monthly records and subtract out the 2007 perc purchases in order to be able to determine what the usage amount is for the rolling 12 month total. The total for December 2007, for 265 gallons may need to be corrected to a lower figure after subtracting the amount of Perc drained from the old machine to the new machine in 2006.
- I asked if they had purchased the new detector as required. He showed the Model - TIF 5050A Halogen Detector. The device states it meets the SSAE J1627 for R134a R12 and R 22. US Patent # 32522428252. It also had directions on side of device, which states turn on, and alarm will sound when a leak is detected. The detector has a steady beep when in use. Mr. Ma stated that no operations manual had come with it. He stated it had cost about \$200.00. I walked and observed around the dry to dry, with Mr. Taek as he used his Halogen detector, and demonstrated how he checked the machine for leaks. (See photos)
- There were no Perchloroethylene odors detected during the observations of the facility.
- All receptacles and containers were closed. The Hazardous waste drum is connected directly to the machine for draining, and was located in secondary containment.
- I informed Mr. Taek of the violations, and that a warning letter was possible with penalties for failure to maintain the records for weekly leaks and temperature checks, and the monthly Perc usage totals from January 2008 – October 2008. I obtained Mr. Taek signature on annual certification, which stated these compliance discrepancies of the general permit conditions.

**ADDITIONAL SITE INFORMATION**

<b>Facility Name:</b>	Hi Tech Cleaners & Laundry, Inc.
<b>ARMS #:</b>	103 0459

<b>Machine #1:</b>	Multi Matic		
Manufacturer	Capacity	lbs	
Model#	L – 40	Serial#	40SL-R1-0807-7572
		Mfg yr	2007

<b>Machine #2:</b>			
Manufacturer	Capacity	lbs	
Model#	Serial#	Mfg yr	

**Notification (unpermitted sources only):**

- 1. Was the facility assisted in filling out the notification by the inspector?  Y  N
- 2. Did the facility insist on filling out its own notification, and will send it to FDEP?  Y  N

**Record keeping :**

- 1. Does facility have statement/specs as to the design accuracy of the temperature sensor?  Y  N  
(Temperature of 45EF w/accuracy  $\nabla$ 2EF, or 7.2EC w/accuracy of  $\nabla$ 1.1EC)

**Hazardous Waste:**

- 1. Is all perc. contaminated wastewater either treated or disposed of properly?  Y  N
- 2. If wastewater is evaporated, is it an approved system, and using carbon filtration?  Y  N
- 3. Does the facility have secondary containment for the dry-dry machine?  Y  N
- 4. Does the facility have secondary containment for any perc. waste containers?  Y  N

**Boiler:**

Manufacturer	Fulton	Hp	15
Model #	FB025A	Serial #	RM7895A
		Mfg yr	2005

Fuel Type:    Natural gas?                          Propane?                        Fuel oil?           

**Comments:**    Exempt from permitting

## ENFORCEMENT SUMMARY

<b>Facility Name:</b>	Hi Tech Cleaners & Laundry, Inc.
<b>ARMS #:</b>	103 0459

Viol#	Violation Description	Frequency	From	To
per00	Failure to notify and obtain a permit			
per01	No purchase records	Monthly		
per02	No perc. purchase rolling totals	Monthly	1/1/08	10/27/08
per03	No leak log	<input checked="" type="checkbox"/> Weekly <input type="checkbox"/> Bi-weekly	1/1/08	10/27/08
per04	No temp. log	Weekly	1/108	10/27/08
per05	No SSM plan			
per06	Temp. sensor accuracy verification			
per07	No leak checks	<input type="checkbox"/> Weekly <input type="checkbox"/> Bi-weekly		
per08	No temp. checks	Weekly		
per09	Perceptible leaks			
per10	No carbon absorber			
per11	No carbon absorber test	Weekly		
per12	No leak tight containers			
per13	No separator pre-filter			
per14	Leaks not repaired within 24hrs.			
per15	Repair refrig. cond./carbon abs. within 2 days			

Viol#	Comments
per02	Mr. Taek Ma showed a Perc purchase invoice, but had not recorded the amount into a record to calculate the 12 month rolling totals for Perc usage.
per03	Mr. Taek Ma did not obtain a 2008 calendar so did not keep records for leak checks
per04	Mr. Taek Ma because did not obtain a 2008 calendar so did not keep records for temperature reading.

# Hi Tech Cleaners & Laundry, Inc.

5523 Roosevelt Blvd., Clearwater



**Project Id:** 66854      **Permit No:** 1030459-002-AG      **Arms Number:**  
**Inspector:** Shea Jackson      **Inspection Date:** 10/27/08  
**Source (EU):** Existing Large, Multi Matic L40, Serial No. 40SL-Ri-0807-7572 Dry-to-dry machine (2007)  
**Description:** -The instructions for use were on the side panel of the detector.

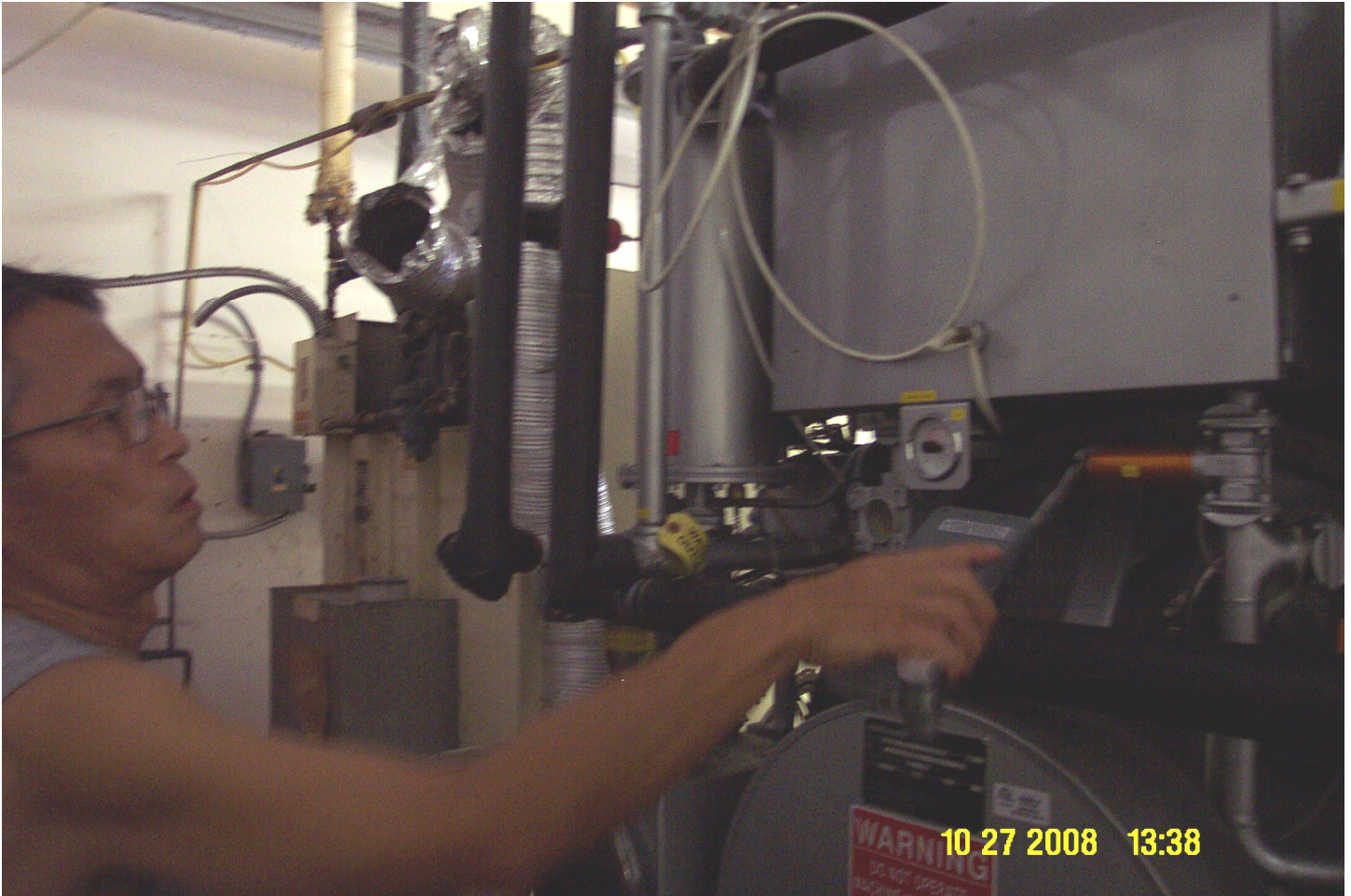


**Hi Tech Cleaners & Laundry, Inc.**  
5523 Roosevelt Blvd., Clearwater



**Project Id:** 66854      **Permit No:** 1030459-002-AG      **Arms Number:**  
**Inspector:** Shea Jackson      **Inspection Date:** 10/27/08  
**Source (EU):** Existing Large, Multi Matic L40, Serial No. 40SL-Ri-0807-7572 Dry-to-dry machine (2007)  
**Description:**      -The model information was on the end panel of the detector.

**Hi Tech Cleaners & Laundry, Inc.**  
5523 Roosevelt Blvd., Clearwater



**Project Id:** 66854      **Permit No:** 1030459-002-AG      **Arms Number:**  
**Inspector:** Shea Jackson      **Inspection Date:** 10/27/08  
**Source (EU):** Existing Large, Multi Matic L40, Serial No. 40SL-Ri-0807-7572 Dry-to-dry machine (2007)  
**Description:**      -Mr. Taek Ma showed how he uses the Halogen detector during his Perc leak checks for the dry to dry machine.