HALOGENATED SOLVENT DEGREASERS
TITLE V GENERAL PERMIT
COMPLIANCE INSPECTION CHECKLIST

TYPE OF INSPECTION: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ❑
RE-INSPECTION (FUI) ❑ ARMS COMPLAINT NO._____

AIRS ID#: 1030389 **DATE:** **10/7/2008** **TIME IN:** **1:00 pm** **TIME OUT:** **1:30 p,m**

FACILITY NAME: **F.K. Instrument Co., Inc.**

FACILITY LOCATION: 2134 Sunnydale Blvd.
Clearwater, FL 33765

RESPONSIBLE OFFICIAL : **Erich Klopfer** **PHONE:** 727-461-6060

CONTACT NAME: Erich Klopfer **PHONE:** 727-461-6060

PART I: NOTIFICATION

(check appropriate box) **Facility Compliance Status**: IN ☒

1. New facility notified DARM 30 days prior to startup ❑ (ARMS Data) MNC ❑
2. Facility failed to notify DARM to use general permit ❑ SNC ❑
3. Halogenated solvent used at facility: ***NO LONGER IN USE, SUBSTITUTED SIMSOLV 218 NON HAP***

perchlorethylene	❑	methylene chloride	❑
trichloroethylene	☒	1,1,1-trichloroethane	❑
carbon tetrachloride	❑	chloroform	❑

4. Facility indicated on notification form that it has the following machine type(s). Check more than one box if applicable:

Batch Vapor, x $\leq$ 1.21 m^2	☒	New In-line	❑	Batch Cold	❑
Batch Vapor, x > 1.21 m^2	❑	Existing In-line	❑		

PART II: CLASSIFICATION

1. Indicate the machine type(s) observed at the facility:

Batch Vapor, x $\leq$ 1.21 m^2	☒	New In-line	❑	Batch Cold (immersion)	❑
Batch Vapor, x > 1.21 m^2	❑	Existing In-line	❑	Batch Cold (remote reservoir)	❑

PART III: GENERAL CONTROL REQUIREMENTS

A. Batch Vapor and In-Line Machines

Does the facility:

1. Maintain an idling and downtime mode cover that is readily opened and closed, that completely covers, has no cracks, holes, or defects; OR maintain a room designed with reduced draft according to Part II, Section (5)(c)6.b of the permit notification? ❑Y ❑N
2. Maintain a freeboard ratio of 0.75 or greater? ❑Y ❑N
3. Utilize a parts basket or parts whose size is less than 50% of the solvent-air interface area; OR introduce parts or parts basket at 0.9 m/min (3 ft/sec) or less? ❑Y ❑N
4. Conduct all spraying operations within the vapor zone or an area not directly exposed to ambient air? ❑Y ❑N
5. Install and maintain an automated parts handling system capable of moving the parts/parts basket at 3.4 m/min. (11ft/min) or less? ❑Y ❑N
6. Install and maintain a carbon adsorber on all machines using a lip exhaust? The exhaust concentration should not exceed 100 ppm halogenated solvent, the carbon adsorber should not be by-passed, the lip exhaust shall be located above the machine cover. ❑Y ❑N ❑N/A
7. Have each machine equipped with --
   a. a device to shut off sump heat if the solvent level drops to the sump heater coils? ❑Y ❑N
   b. a device to shut off sump heat if the vapor level rises above the height of the vapor condenser? ❑Y ❑N
   c. a primary condenser? ❑Y ❑N
8. Store all waste solvent, still bottoms, and sludges in closed containers? ❑Y ❑N

B. Batch Cold Cleaning Machine

Does the facility:

1. Collect and store all waste solvent in closed containers? ❑Y ❑N
2. Use a flexible hose or flushing device only within the freeboard area? ❑Y ❑N
3. Drain cleaned parts for 15 seconds or longer or until dripping ceases, whichever is longer? ❑Y ❑N
4. Maintain the solvent level inside the machine at or below the fill line? ❑Y ❑N
5. Immediately clean up spills during solvent transfer? Store wipe rags in a covered container? ❑Y ❑N
6. Operate the agitator to produce a rolling motion? *(applicable only when air- or pump-agitated solvent bath used)* ❑Y ❑N ❑N/A
7. Ensure that the machine is not exposed to drafts greater than 40 m/min (132 ft/min) when the cover is open? ❑Y ❑N
8. Ensure that sponges, fabrics, wood and paper products are not placed in the machine? ❑Y ❑N

Remote Reservoir Type Only --

9. Employ a tightly fitting cover over the solvent sump? The cover must be closed at all times except during parts cleaning. ❑Y ❑N ❑N/A

Immersion Type Only --

10. Employ a tightly fitting cover and a water layer with a thickness of at least 2.5 cm (1 in.); OR employ a tightly fitting cover and maintain a freeboard ratio of 0.75? Tightly fitting cover must be closed at all times except during parts entry and removal. ❑Y ❑N ❑N/A

PART IV: PROCESS VENT CONTROLS *(not applicable to batch cold cleaning machines)*

Facility chose to meet requirements using:

- ❑ control device combination / work practice standards
- ❑ alternative solvent emission limit *(proceed to Part V)*
- ❑ idling emission limit / work practice standards *(proceed to Part V)*

A. Batch Vapor Machines, x $\leq$ 1.21 m^2

control comb. selected		In use		
❑	working mode cover / 1.0 freeboard ratio / superheated vapor	❑	❑	❑
❑	reduced room draft / 1.0 freeboard ratio / superheated vapor	❑	❑	❑
❑	reduced room draft / 1.0 freeboard ratio / dwell	❑	❑	❑
❑	freeboard refrig. device / superheated vapor	❑	❑	
❑	freeboard refrig. device / working mode cover	❑	❑	
❑	freeboard refrig. device / reduced room draft	❑	❑	
❑	freeboard refrig. device / 1.0 freeboard ratio	❑	❑	
❑	freeboard refrig. device / dwell	❑	❑	
❑	freeboard refrig. device / car[illegible]sorber	❑		
❑	carbon adsorber / 1.0 freeboard[illegible] superheated	❑	❑	❑

B. Batch Vapor Machines, x >

control comb. selected		In use		
❑	freeboard refrig. devi[illegible]erheate[illegible] / 1.0 freeboard ratio	❑	❑	❑
❑	freeboard refrig. device /[illegible]heated vapor / working mode cover	❑	❑	❑
❑	freeboard refrig. device / superheated vapor / reduced room draft	❑	❑	❑
❑	freeboard refrig. device / superheated vapor / carbon adsorber	❑	❑	❑
❑	freeboard refrig. device / reduced room draft / dwell	❑	❑	❑
❑	freeboard refrig. device / reduced room draft / 1.0 freeboard ratio	❑	❑	❑
❑	1.0 freeboard ratio / reduced room draft / superheated vapor	❑	❑	❑

C. Existing In-Line Machines

control comb. selected		In use		
❑	freeboard refrig. device / 1.0 freeboard ratio	❑	❑	❑
❑	superheated vapor / 1.0 freeboard ratio	❑	❑	❑
❑	freeboard refrig. device / dwell	❑	❑	
❑	carbon adsorber / dwell	❑	❑	

D. New In-Line Machines

control comb. selected		In use	
❑	freeboard refrig. device / superheated vapor	❑	❑
❑	freeboard refrig. device / carbon adsorber	❑	❑
❑	superheated vapor / carbon adsorber	❑	❑

PART V: RECORDKEEPING REQUIREMENTS

Has the responsible official maintained the following:

1. Owner's manuals, design specifications, and other instructional materials for cleaning machine and control equipment? ❑Y ❑N
2. Date of installation for cleaning machine and all control devices? If the exact date is unknown, they must have a letter stating installation occurred before or after 11/29/93. ❑Y ❑N
3. Halogenated solvent content for each solvent used? *(exempt if <5% by weight)* ❑Y ❑N
4. Estimates of annual solvent consumption for each machine? ❑Y ❑N
5. Dates of solvent additions and amounts added to each machi *only to those using an alternative emission limit)* ❑Y ❑N ❑N/A
6. Idling emissions limit tests, including val ained during test? *(applicable only to those using an idli sions limit)* ❑Y ❑N ❑N/A
7. All control device and param ing? able only h vapor and in-line machines) ❑Y ❑N ❑N/A
8. Information on remedial actions i vent o ees or other repairs and subsequent monitoring of affected p ers? ❑Y ❑N ❑N/A
9. Monthly emissions calculations *(appli only to those using an alternative or idling emission limit)* ❑Y ❑N ❑N/A
10. 3-month rolling average emissions calculations? *(applicable only to those using an alternative emission limit)* ❑Y ❑N ❑N/A
11. Cleaning capacity calculations? *(applicable only to those using an alternative emission limit without a solvent-air interface)* ❑Y ❑N ❑N/A

PART VI: ADDITIONAL SITE INFORMATION

10/7/2008 - Inspection of the facility requested by GR, prior to 10/31/2008, after facility rescind permit letter was received. I inspected the facility to verify the Trichloroethylene was no longer in use at the facility. I inspected the facility with contact Mr. Uwe Moerseburg. We observed the tank now is in use with substitute solvent Simesolv 218. Mr. Moesrseburg stated the new product was easier to use and no odors. He stated it works as effectively but usually takes twice as much tank time. He stated the solvent may be a little more expensive to purchase and dispose of, but they find it safer to use. The trichloroethylene usage records had been maintained up to July 2008. The monthly 3 month rolling average was 30.5 lbs down to 30.4 lbs by June 2008, and did not exceed the 31.7 lbs emission limitation of the permit. The monthly solvent additions to the tank stopped in June with 84 lbs, no usage in July 2008. The hazardous waste invoice for TCE sludge on July 29, 2007 indicated the last of the toluene had been removed.
(See photos , invoice and records)

Shea Jackson
Inspector's Name

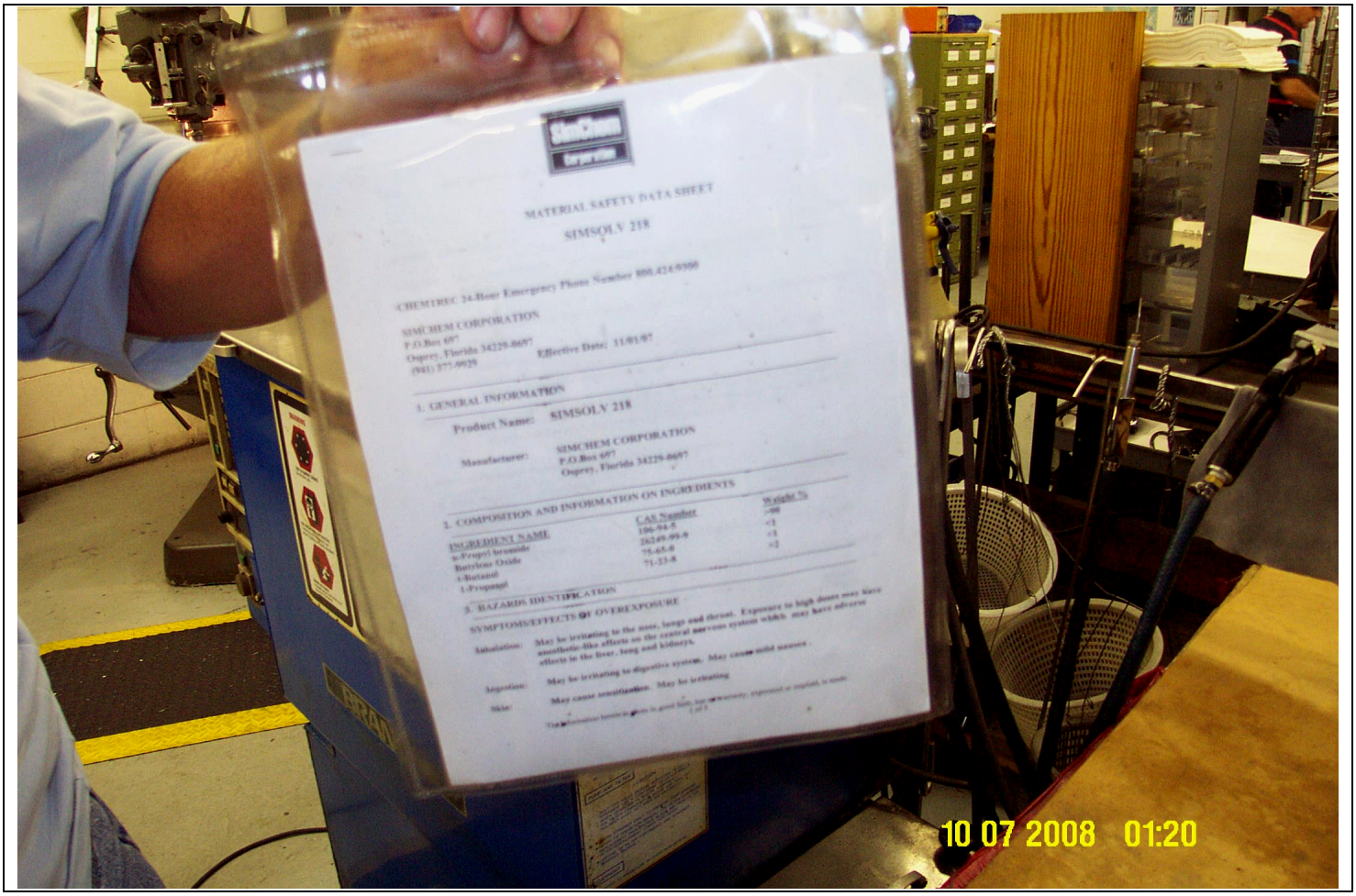
October 7, 2008
Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

F.K. Instrument Co., Inc.

2134 Sunnydale Blvd., Clearwater



Project Id: 66829 **Permit No:** 1030389-003-AG **Arms Number:** 0389

Inspector: Shea Jackson **Inspection Date:** 10/7/08

Source (EU): Existing Halogenated Batch Vapor Degreaser (Branson BSD 1216, 1982) with interface area <1.21 square meter. Facility uses trichloroethylene

Description:	-The tank is now being used for Simsolv 218 (non HAP) Solvent instead of trichloroethylene.

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