PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

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

AIRS ID#: 103 0397	**Date:** 3/26/2009	**Time In:** 12:00AM	**Time Out:** 12:35AM		
Facility Name:	Bay Area Business Cleaners, Inc.				
Facility Location:	945 Huntley Avenue				
	Dunedin, FL, 34698				
Responsible Official:	Kenneth Schumann	**Phone No:**	727-733-0959		
Emis. Unit Description:	Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (12/8/1991) with a 25 HP Hurst No. 4 fuel oil fired boiler				
Permit Number:	1030397-004-AG	**Exp. Date:**	9/12/12		
Facility Contact:	Kenneth Schumann	**Phone:**	727-733-0959		
Compliance Status:	☒**IN** ☐ **MNC** ☐**SNC**				

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:

☐ 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, **x <140** gal/yr	
Transfer only, x <200 gal/yr	☒	Transfer only, x <200 gal/yr	☐
Both types, x <140 gal/yr		Both types, x <140 gal/yr	
(Constructed **before 12/9/91**)		(Constructed on or **after 12/9/91**)	
3. **Existing large** area source		4. **New large** area source	
Dry-to-dry only, **140> x <2,100** gal/yr		Dry-to-dry only, **140> x <2,100** gal/yr	
Transfer only, 200> x <1,800 gal/yr	☐	Transfer only, 200> x <1,800 gal/yr	☐
Both types, 140> x <1,800 gal/yr		Both 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 ☒ Y ☐ N ☐ Can not determine

If no, please check the appropriate classification:

☒facility qualified for a general permit as number 1 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: 108 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?	☒ Y	☐ N	☐ NA
2. Examining the containers for leakage?	☒ Y	☐ N	☐ NA
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	☐ 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 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	☐ 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^{o} 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. 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 ☐ NA
2.	Measured and recorded the washer exhaust temp[illegible]re at the condenser inlet and outlet weekly?	☐Y	☐N ☐NA
	Is the temperature differential equal to o[illegible]e[illegible]° F?	☐Y	☐N ☐NA
3.	Measured and recorded th[illegible] concentration [illegible] weekly at the end of the final drying cycle while the [illegible]e is venting [illegible]rber, [illegible] machines are equipped with a carbon ad[illegible]or?	☐Y	☐N ☐NA
	Is the pe[illegible]n e[illegible] or less tha[illegible] ppm?	☐Y	☐N ☐NA
4.	Assured that the s[illegible]g po[illegible]on adsorber exhaust for measuring perc. concentrations is at [illegible]duct dia[illegible]ers downstream of any bend, contraction, or expansion; is at least [illegible]iameters upstream from any bend contraction, or expansion; and downstream from r[illegible]er 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?	☒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 ☐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?	☒Y	☐N ☐NA
4.	Maintained calibration data? *(direct reading instruments only)*	☐Y	☐N ☒NA
5.	Maintained exhaust duct monitoring data on perc concentrations?	☐Y	☐N ☒NA
6.	Maintained startup/shutdown/malfunction plan?	☒Y	☐N
7.	Maintained deviation reports?	☒Y	☐N ☐NA
	Problem corrected?	☒Y	☐N ☐NA
8.	Maintained compliance plan, if applicable?	☐Y	☐N ☒NA

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 does the responsible official use?**	☒Y	☐N
	Visual examination (condensed solvent of exterior surfaces)	☒	
	Physical detection (airflow felt through gaskets)	☒	
	Odor (noticeable perc odor)	☒	
	Use of direct-reading instrumentation (FID/PID/calorimetric tubes)	☐	
	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	☒Y	☐N	Muck cookers	☐Y ☒N
Door gaskets and seating	☒Y	☐N	Stills	☒Y ☐N
Filter gaskets and seating	☒Y	☐N	Exhaust dampers	☒Y ☐N
Pumps	☒Y	☐N	Diverter valves	☐Y ☒N
Solvent tanks and containers	☒Y	☐N	Cartridge Filter housing	☒Y ☐N
Water separators	☒Y	☐N		

Shea Jackson	3/26/2009
Inspector=s Name (Please Print)	Date of Inspection
	After repair to dry to dry performed
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.) ☒Y ☐N ☐NA

***Comment**: The Facility RO stated he had performed leak checks and had updated the records. When the Facility RO used the halogen detector to demonstrate a leak check, the detector alarm did not detect any leaks around the equipment (See photo).*

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). ☒Y ☐N ☐NA

***Comment:** The Facility RO performed leak checks with the TIFXL 1A detector he had on site during the re-inspection*

(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? ☒Y ☐N ☐NA

***Comment:** Mr. Shumann was operating the detector according to the manufacturers instructions, the detector was used during his demonstration of repair of leaks on the dry to dry. There was no longer a Perc leak detected coming from the dry to dry exhaust fan area.*

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? ☒Y ☐N ☐NA

***Comment:** Mr. Shumann was operating the detector as required, when asked to turn on and demonstrate use, he placed the detector at the surface of each component interface to show the leak had been repaired..*

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? ☐Y ☐N ☒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? ☒Y ☐N ☐NA

***Comment:** The facility halogenated detector is listed on the FDEP approved list, as capable of detecting 25 ppm.*

ADDITIONAL SITE INFORMATION

Facility Name:	Bay Area Business Cleaners, Inc.
ARMS #:	103 0397

- *I returned to perform inspection and determine if leaks had been stopped. I met with the responsible official Mr. Kenneth Schumann, he had repaired the dry to dry. Mr Schumann had also repaired additional parts and had placed a sealant around the gasket areas to prevent leaks.*
- *I reviewed the 2009 calendar Bi weekly leak check records. The calendar record is now being maintained. Mr. Schumann calculated and updated the monthly 12 month consecutive Perc totals*
- *Mr. Schumann is keeping the purchase receipts for the perchloroethylene and Hazardous waste manifest copies. The temperature recording is not required for existing small machines classification.*
- *The gasket and other parts had been noted as repaired*
- *I observed the HP 25 dry to dry machine; was in operation at this time.*
- *Mr. Schumann stated he had used the detector and it did not alarm since he had repaired the dry to dry. Mr. Schumann used the detector to demonstrate the leaks had been repaired by going around all the sealed areas on the dry to dry. (See photos). I also checked with the county halogen detector and no alarm sounded for detection of perc leaks.*
- *The facility was now operating in compliance of the general permit conditions.*

ADDITIONAL SITE INFORMATION

Facility Name:	Bay Area Business Cleaners, Inc.
ARMS #:	103 0397

Machine #1:				
Manufacturer	HP 25	Capacity	lbs	
Model#		Serial#	Mfg yr	1991
Machine #2:				
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? (Temperature of 45EF w/accuracy ∀2EF, or 7.2EC w/accuracy of ∀1.1EC)	☐Y	☒N

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	Hurst		Hp	25
Model #		Serial #	Mfg yr	

Fuel Type: Natural gas? ☐ Propane? ☐ Fuel oil? ☒

Comments: The boiler is same unit as previous inspection, no changes (See photo)

ENFORCEMENT SUMMARY

Facility Name:	Bay Area Business Cleaners, Inc.
ARMS #:	103 0397

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		
per03	No leak log	☐ Weekly ☒ Bi-weekly		
per04	No temp. log	Weekly		
per05	No SSM plan			
per06	Temp. sensor accuracy verification			
per07	No leak checks	☐ Weekly ☒ Bi-weekly		
per08	No temp. checks	Weekly		
per09	Perceptible leaks from containers			
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	*The facility 12 month consecutive Perc totals were updated*
per03	*The facility Bi-weekly leak log were updated*
per07	*The leak check performed during this inspection. by the RO, Mr. Schumann demonstrated he had corrected*
Per14	*During the inspection the RO leak checked with the halogen detector, and when around the exhaust fan the alarm was no longer sounding.*

Bay Area Business Cleaners, Inc. Tabor Cleaners

945 Huntley Avenue, Dunedin

Project Id: 69087 **Permit No:** 1030397-004-AG **Arms Number:** 0397

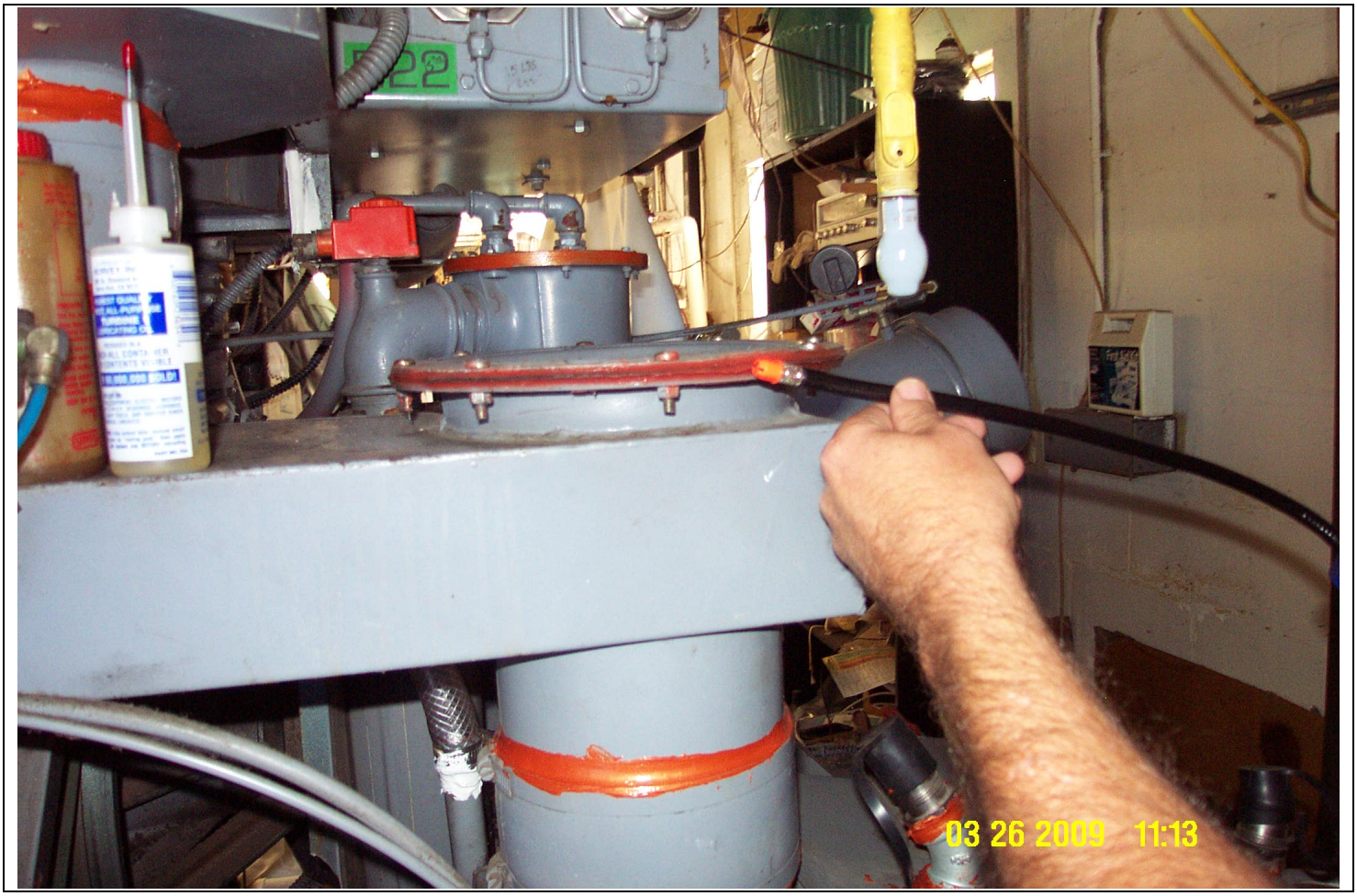
Inspector: Shea Jackson **Inspection Date:** 3/ 26/09

Source (EU): Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (12/8/1991) with a 10 HP No. 4 fuel oil fired boiler

Description: [The facility had replaced the gasket and seal around gaskets and parts to prevent Perc leaks. The R.O. used the new Halogen TIF XL-1A and performed a leak check to demonstrate the repair.]

Bay Area Business Cleaners, Inc. Tabor Cleaners

945 Huntley Avenue, Dunedin



Project Id: 69087 **Permit No:** 1030397-004-AG **Arms Number:** 0397

Inspector: Shea Jackson **Inspection Date:** 3/26/09

Source (EU): Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (12/8/1991) with a 10 HP No. 4 fuel oil fired boiler

Description: [The facility had put additional sealant around parts to prevent Perc leaks. The R.O. used the new Halogen TIF XL-1A and performed a leak check to demonstrate the repair.]

Bay Area Business Cleaners, Inc. Tabor Cleaners

945 Huntley Avenue, Dunedin

Project Id: 69087 **Permit No:** 1030397-004-AG **Arms Number:** 0397

Inspector: Shea Jackson **Inspection Date:** 3/ 26/09

Source (EU): Existing, Small Perchloroethylene Dry Cleaner: One Dry-to-dry machine (12/8/1991) with a 10 HP No. 4 fuel oil fired boiler

Description: [The R.O. used the new Halogen TIF XL-1A and performed a leak check to demonstrate lids tight on Hazardous waste containers.