



# 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

February 26, 2010

Walter Smallwood  
Mirror Cleaners  
21 North Pat Thomas Parkway  
Quincy, Florida 32351-2200

Dear Mr. Smallwood:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is **0390037**. The entitlement period **expires on June 14, 2012**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the inspection results, the Tallahassee Branch Office reported a status of **In Compliance** for your facility. However, the following issue may require your attention:

Refrigerator condenser system monitoring is required under 40 CFR Part 63 Subpart M and Rule 62-213.300 F.A.C. Weekly temperature checks and recordkeeping are required. Please monitor the system and repair/maintain monitoring equipment as required. Failure to properly monitor the refrigeration system could result in a non compliant facility status.

Also, 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 March 12, 2009. Please check your compliance status box, sign and date the bottom of the form, and return or mail the form back to this office. You may keep the yellow copy for your records.

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



Environmental  
Compliance

## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0390037 **DATE:** 2/18/2010 **ARRIVE:** 1:10 **DEPART:** \_\_\_\_\_

**FACILITY NAME:** MIRROR CLEANERS III

**FACILITY LOCATION:** 21 N PAT THOMAS PKWY  
 QUINCY 32351-2200

**OWNER/AUTHORIZED REPRESENTATIVE:** WALTER SMALLWOOD **PHONE:** (850)627-3750

**CONTACT NAME:** \_\_\_\_\_ **PHONE:** \_\_\_\_\_

**ENTITLEMENT PERIOD:** 6/14/2007 / 6/14/2012  
 (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)

<p><b>A. 1. Existing small area source</b> <input type="checkbox"/>          dry-to-dry only, <math>x &lt; 140</math> gal/yr          transfer only, <math>x &lt; 200</math> gal/yr          both types, <math>x &lt; 140</math> gal/yr          (constructed before 12/9/91)</p>	<p><b>2. New small area source</b> <input type="checkbox"/>          dry-to-dry only, <math>x &lt; 140</math> gal/yr          transfer only, <math>x &lt; 200</math> gal/yr          both types, <math>x &lt; 140</math> gal/yr          (constructed on or after 12/9/91)</p>
<p><b>3. Existing large area source</b> <input checked="" type="checkbox"/>          dry-to-dry only, <math>140 \leq x \leq 2,100</math> gal/yr          transfer only, <math>200 \leq x \leq 1,800</math> gal/yr          both types, <math>140 \leq x \leq 1,800</math> gal/yr          (constructed before 12/9/91)</p>	<p><b>4. New large area source</b> <input type="checkbox"/>          dry-to-dry only, <math>140 \leq x \leq 2,100</math> gal/yr          transfer only, <math>200 \leq x \leq 1,800</math> gal/yr          both types, <math>140 \leq x \leq 1,800</math> gal/yr          (constructed on or after 12/9/91)</p>
<p><b>5. Ineligible for General Permit</b> <input type="checkbox"/>          drop store/out of business/petroleum          facility exceeds above limits</p>	

**B. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 165 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**

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

(check  only one box for each question)

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 -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	g) Muck cookers -----	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
b) Door gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	h) Stills -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
c) Filter gaskets and seating -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	i) Exhaust dampers -----	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
d) Pumps -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	j) Diverter valves -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
e) Solvent tanks and containers--	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	k) Cartridge filter housings	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
f) Water separators -----	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A				

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

a) Visual examination (condensed solvent on exterior surfaces) -----	a) <input checked="" type="checkbox"/>
b) Physical detection (airflow felt through gaskets) -----	b) <input checked="" type="checkbox"/>
c) Odor (noticeable perc odor) -----	c) <input checked="" type="checkbox"/>
d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) -----	d) <input type="checkbox"/> ** (see below)
e) Halogen leak detector -----	e) <input checked="" type="checkbox"/>

**\*\*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) <input type="checkbox"/> Yes	<input type="checkbox"/> No
2) Calibrated against a standard gas prior to and after each use (PID/FID only)? -----	2) <input type="checkbox"/> Yes	<input type="checkbox"/> No
3) Inspected for leaks and obvious signs of wear on a weekly basis? -----	3) <input type="checkbox"/> Yes	<input type="checkbox"/> No
4) Kept in a clean and secure area when not in use? -----	4) <input type="checkbox"/> Yes	<input type="checkbox"/> No
5) Verified for accuracy by use of duplicate samples (calorimetric only)? -----	5) <input type="checkbox"/> Yes	<input type="checkbox"/> No

Tracy White

2/18/2010

Inspector's Name (Please Print)

Date of Inspection

*Tracy White*

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:**

2/18/2010, 1:10 P.M.

I met with Walter Smallwood. Mr. Smallwood provided the 2009 records. Records were maintained. He provided the 2010 records, however the last recorded date of entry for temperature checks was on 1/25/2010.

Mr. Smallwood explained that the temperature probe was broken "sometime last week," He displayed the replacement part he had ordered to repair it.

The drycleaning machine appeared to have gauges for compressor low and high side pressure. Mr. Smallwood requested the rules for using condenser pressure checks in lieu of temperature checks. I told him that I would send him the information (attached to this report).

However he also indicated he would repair the temperature probe immediately.

A leak detector device was on-site. I informed Mr. Smallwood that he should make a note in his records for the once/month check that requires use of the device.

Perc rolling total for January 2010 was at 165 gallons.

**Recommendations:**

The temperature probe that is necessary for recording the exhaust stream temperature of the condenser exhaust appears to be broken. However if the device is not repaired, the facility staff may use high and low pressure during the drying phase monitored. The range specified in the Manufacturer's operating instructions should be used.

The pressure check information should be recorded if this method is used or until the temperature probe is repaired. If the condenser stream temperature method is used, the unit should be repaired immediately and weekly recordkeeping should resume. Failure to maintain required records may result in a status of non compliance.

Source: 40 CFR Sec. 63.323; 324.

§ 63.323 Test methods and monitoring.

- (a) (1) The owner or operator shall monitor on a weekly basis the parameters in either paragraph (a)(1)(i) or (ii) of this section.
- (i) The refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions.
- ii) The temperature of the air perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaimer with a temperature sensor to determine if it is equal to or less than 7.2 °C (45 °F) before the end of the cool-down or drying cycle while the gas-vapor stream is flowing through the condenser. The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2 °C (45 °F) to an accuracy of  $\pm 1.1$  °C ( $\pm 2$  °F).

§ 63.324 Reporting and recordkeeping requirements.

- (d) (5) The date and monitoring results (temperature sensor or pressure gauge) as specified in § 63.323 if a refrigerated condenser is used to comply with § 63.322(a), (b), or (o); and



# NEW EPA REGULATIONS FOR PERCHLOROETHYLENE DRY CLEANER FACT SHEET



## FLORIDA SMALL BUSINESS ENVIRONMENTAL ASSISTANCE

*On July 27, 2006, the Environmental Protection Agency (EPA) strengthened air toxics requirements for all dry cleaners that use the chemical perchloroethylene (PERC).*

*The rule affects three types of dry cleaners that use PERC: large industrial and commercial dry cleaners; small area source dry cleaners (found in strip malls or stand-alone); and small dry cleaners located in residential buildings. The majority of dry cleaners in Florida are small area source dry cleaners.*

### SMALL AREA SOURCE DRY CLEANERS

Requirements for existing area source dry cleaners (machines installed prior to December 21, 2005)

- Eliminate all transfer machines by July 27, 2008.
- Begin using a halogen leak detector<sup>1</sup> monthly by July 27, 2008 to detect PERC leaks and maintain records.

Requirements for new area source dry cleaners (machines installed after December 21, 2005)

- Eliminate all transfer machines by July 27, 2006.
- Add carbon adsorbers to the closed-loop machines with refrigerated condensers that are required under the 1993 rule.
- Use a halogen leak detector<sup>1</sup> monthly to detect PERC leaks and maintain records.

*(Note: Both new and existing dry cleaners must still perform weekly or bi-weekly leak checks on each machine. All leak detection checks and findings should be recorded on your dry cleaning compliance calendar)*

### SMALL CO-RESIDENTIAL DRY CLEANERS

The final rule eliminates PERC emission risks for small dry cleaners co-located in residential buildings:

Requirements for existing co-residential dry cleaners

- Eliminate all transfer machines by July 27, 2008.
- Begin using a halogen leak detector monthly by July 27, 2008, to detect PERC leaks, and maintain records.
- Phase-out PERC machines as the units wear out. All existing PERC machines must be removed from residential buildings by December 21, 2020. These dry cleaners may replace worn-out PERC machines with newer available non-PERC technology.

Requirements for new co-residential dry cleaning machines

- PERC use will not be allowed.
- Any new PERC dry cleaning machine in a residential building that began operations between December 21, 2005 and July 27, 2006 must eliminate PERC use by July 27, 2009. *(During the three (3) year interim PERC elimination period (July 27, 2006 to July 27, 2009), new PERC co-residential sources will be required to use refrigerated condensers, and secondary carbon adsorbers, with equipment housed inside a vapor barrier enclosure<sup>2</sup> with general ventilation<sup>3</sup> to the outside air.)*
- Must conduct weekly leak inspections using a leak detection device such as a halogenated hydrocarbon detector<sup>4</sup> or PERC gas analyzer<sup>5</sup>

**FREE CONFIDENTIAL HOTLINE**



**1-800-722-7457**

## EPA TECHNICAL CORRECTION

### Alternative monitoring requirements

- Refrigerated condenser monitoring - Owners and operators have two options: #1. monitor the high and low pressure of the refrigeration system, or #2. monitor the temperature sensors of the gas-vapor outlet stream.
- Both new and existing dry cleaners must still perform weekly or bi-weekly leak checks on each machine. All leak detection checks and findings should be recorded on your dry cleaning compliance calendar.

### Definitions:

**Halogenated leak detector<sup>1</sup>**—A portable device capable of detecting halogen vapor concentration of 25 ppm by volume

**Vapor Barrier Enclosure<sup>2</sup>**—A room that encloses a dry cleaning system and is constructed of vapor barrier material that is impermeable to perchloroethylene.

**General ventilation<sup>3</sup>**—The vapor barrier enclosure shall be equipped with a ventilation system that exhausts outside the building and is completely separate from the ventilation system for any other area of the building.

**Halogenated hydrocarbon detector<sup>4</sup>**— A portable device capable of detecting PERC vapor concentrations of 25 ppm by volume.

**PERC gas analyzer<sup>5</sup>**—A flame ionization, photoionization, or infrared analyzer capable of detecting PERC vapor concentrations of 25 ppm.

Please refer to 40 Code of Federal Regulations Part 63 National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities for complete rules and regulations.

Visit us at: <http://www.dep.state.fl.us/air/programs/sbeap.htm>

The SBEAP is part of the Florida Department of Environmental Protection's Division of Air Resource Management

**FREE CONFIDENTIAL HOTLINE**



**1-800-722-7457**



**DRY CLEANER AIR QUALITY GENERAL PERMIT  
ANNUAL COMPLIANCE CERTIFICATION FORM**

<b>FACILITY NAME:</b> _____	<b>DATE:</b> _____
<b>FACILITY LOCATION:</b> _____	
_____	

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: \_\_\_\_\_

<i>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.</i>			
<b>RESPONSIBLE OFFICIAL:</b> _____			
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.