



PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0910088 **DATE:** 7/13/07 **ARRIVE:** 11:31 **DEPART:** 12:26
FACILITY NAME: HIGHTECH CLEANERS
FACILITY LOCATION: 304 NE Eglin Parkway
 FT WALTON BEACH 32548
RESPONSIBLE OFFICIAL: MICHELLE YOO **PHONE:** (850)862-1480
CONTACT NAME: Jay Yoo **PHONE:** (850)862-1480
REMITTANCE YEAR: 2007 **ENTITLEMENT PERIOD:** 4/21/2005 / 4/21/2010
(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 unknown due to lack of record-keeping - unknown 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, reclaimers, 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

(check only one box for each question)

Does the responsible official:

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

Carol Melton

7/13/07

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Mr. Jay Yoo indicated that he was the owner, and has not been maintaining the record keeping requirements explained in his permit.

Mr. Yoo indicated that he was aware that he was cited for a minor non-compliance during our September 21, 2006 inspection, for incomplete record keeping. Mr. Yoo indicated that he has not taken the time to get his records in order.

Mr. Yoo showed me a copy of his drycleaner calendar. The only markings in his calendar were in January 2007 for leak detection. The amount of perc used and rolling monthly total of yearly perc consumed had not been determined for any of the months since Mr. Yoo obtained the drycleaner. Mr. Yoo indicated that he obtained the drycleaner in February 2005, and all records previous to his ownership had been lost.

Mr. Yoo did find some perc purchase receipts from the supplier PHENIX, which indicated the following:

Date perc purchased	Quantity perc purchased
3/8/06	5 Gallons of sizing containing perc
1/10/07	5 "
3/8/07	5 "
3/21/07	15 Gallons perc
4/18/07	15 Gallons perc
5/16/07	15 Gallons perc
7/11/07	15 Gallons perc

Mr. Yoo indicated that his machine holds 90 gallons perc, but could not produce a manual or any paperwork supporting this.

Mr. Yoo indicated that his employee, Gasper Luna, used to work for Walton Cleaners and knows how to maintain the required record keeping. Mr. Luna indicated that he used to do this for Walton Cleaners, and would help Mr. Yoo with his paperwork if he is assigned the task.

I explained to Mr. Yoo that his store was out of compliance with our rules and that I plan to send him a warning letter.

Mr. Yoo signed his annual compliance certification form indicating that he is out of compliance.

I explained that it would be to Mr. Yoo's advantage to fill out his dry cleaner calendars for the time he has owned the dry cleaner and send us copies of the completed paperwork. I also explained that he needs to determine and provide confirmation of the amount of perc he currently has on the site. Mr. Yoo indicated that he would contact his perc supplier for help in determining how much perc he has on site, and would begin updating his record keeping to show compliance.

Mr. Yoo telephoned on July 19, 2007, and indicated that he has updated all his required paper work and will mail us a copy of it.