PERCHLOROETHYLENE DRY CLEANERS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0910088 **DATE:** 2/29/08 **ARRIVE:** 10:40 **DEPART:** 12:00

FACILITY NAME: HIGHTECH CLEANERS

FACILITY LOCATION: 304 NE Eglin Parkway

FT WALTON BEACH 32547-2860

OWNER/AUTHORIZED REPRESENTATIVE: MICHELLE YOO **PHONE:** (850)862-1480

CONTACT NAME: Jay C Yoo **PHONE:** (850)862-1480

ENTITLEMENT PERIOD: 4/21/2005 (effective date) / 4/21/2010 (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 ≤ 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)

4. New large area source ☐
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)

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 108 gallons.

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC

Does the responsible official of the dry cleaning facility:

(check ☑ only one box for each question)

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^{o} 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^{o} 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

(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	g) Muck cookers ----------	☒Yes	☐No	☐N/A
b) Door gaskets and seating ------	☒Yes	☐No	☐N/A	h) Stills ----------	☒Yes	☐No	☐N/A
c) Filter gaskets and seating------	☒Yes	☐No	☐N/A	i) Exhaust dampers -------	☒Yes	☐No	☐N/A
d) Pumps ----------	☒Yes	☐No	☐N/A	j) Diverter valves ---------	☒Yes	☐No	☐N/A
e) Solvent tanks and containers--	☒Yes	☐No	☐N/A	k) Cartridge filter housings	☒Yes	☐No	☐N/A
f) Water separators ----------	☒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 — Inspector's Name (Please Print)

2/29/2008 — Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: The condenser temperature and rolling monthly totals of yearly perc consumption were being logged weekly on the 2008 calendar. However, the leak checks were not. Invoices for perc purchased in late 2007 and in 2008 were made available. However, invoices for perc purchased in most of 2007 could not be found. During the site visit Mr. Yoo obtained a fax listing his 2007 perc purchases from his perc supplier Phenix. Mr. Yoo had already sent us a list of his 2006 perc purchases, which he obtained from Phenix. With Mr. Yoo's permission I re-calculated the facilty's rolling monthly total of yearly perc consumption for 2006, 2007, and 2008. The corrected rolling monthly totals of yearly perc consumption were noted on the respective calendars and the corresponding perc purchase list and/or purchase invoices were stapled onto the respective calendar pages. Mr. Yoo indicated he understood the requirement to keep his perc purchase receipts on file. Mr. Yoo also indicated he agreed with stapling his perc purchase invoices to the calendar page representing the month the perc was purchased.

The requirement to perform leak checks and record the condenser temperature were discussed. Mr. Yoo indicated that he has hired "Cesar", the local perc machine maintenance man to check his machine and record the condenser temperature on a weekly basis. Mr. Yoo also explained that he checks his machine on a regular basis for leaks. I showed him how to record on the calendar that he has performed a leak check. During the inspection, I observed him perform a leak check and record it on the calendar. Mr. Yoo indicated that he would ensure a leak check is recorded each week. The corrections made at the site appeared to bring the facility into compliance.