

# Air Pollution Control Division

## Canton City Health Department

420 Market Avenue North • Canton, Ohio • 44702-1544  
(330) 489-3385 • Fax: (330) 489-3335

James M. Adams, R.S., MPH  
Health Commissioner  
Daniel J. Aleman, M.S., PE  
APCD Administrator

**OhioEPA**

APC Contractual Representative  
Serving All of Stark County

COPY

CERTIFIED MAIL

Monday, March 10, 2008

Mr. John P. Foradas  
Blair's Cleaners  
1913 Cleveland Ave. NW  
Canton, OH 44709

**Re: Facility inspection, Monday, March 3, 2008 at Blair's Cleaners: 3775 Cleveland Ave. NW;  
Ohio EPA, DAPC Premise No. 1576051343.**

Dear Mr. Foradas:

On Monday, March 3, 2008, I conducted an inspection of your Blair's operation in Canton. The purpose of the inspection was to observe the operation (D001) for compliance with: 1) Ohio EPA regulations 2) permit to install (PTI) and permit to operate (PTO) terms and conditions and 3) MACT standards for perc dry cleaning operations as established by the USEPA. This letter is to inform you of the violations which were noted during the inspection, of the corresponding action that may be taken by this Agency, and of the action that will need to be taken by Blair's Cleaners in order to rectify such problem areas.

This Agency's records indicate that the Firbimatic 380 was installed in August 1993. The Firbimatic 380 unit was to be installed in accordance with PTI #15-1121 issued June 22, 1994. The noted machine (under Emissions Unit ID D001) is of the closed loop design and currently utilizes a refrigerated condenser as a control device. The Cleveland Ave. NW facility is classified as a large facility based on past perc purchases/usages at that location.

### **Blair's Cleaners, 1913 CLEVELAND AVE. NW 44709, ID # 1576051343 (D001)**

**Finding #1:** Firbimatic 380 – Record keeping  
The facility inspection of March 3, 2008 showed that accurate weekly inspection records for leaking components on the Firbimatic 380 system were not maintained. Likewise, the weekly refrigerated condenser outlet temperature checks on the system ceased to be recorded. Monthly perc purchase records and the 12 month total perc usage records were not maintained. It was found that no records were available to show dates as to when repairs were made or parts were ordered and therefore, if leaks had been repaired within 24 hours, or parts were ordered within 2 working days and installed within 5 working days of receipt. Additionally, it was found that records for the amount of fabrics dry cleaned daily (to determine annual amounts) were not maintained.

**Violation #1:** PTI #15-1121 issued June 22, 1994 for the Firbimatic 380 installation states that 40 CFR, Part 63, Subpart M is an applicable Federal Rule and the MACT record

keeping requirements were spelled out in the Additional Special Terms and Conditions portion of that permit (#1, #2, #4, and #5). The deficiencies noted represent a violation of the MACT standards for dry cleaners established by 40 CFR, Part 63 subpart M. Likewise, since such MACT requirements were included in the Firbimatic 380's PTI #15-1197, failure to comply with such MACT standards and associated permit terms & conditions, would also constitute a violation of OAC rule 3745-35-02(D).

Finding #2: Firbimatic 380 - Work Practice - The facility was found to be operating the collection of still wastes in such a manner that resulted in perc being evaporated into the ambient air in an inappropriate manner. The practice noted consisted of still wastes being collected within an open catch basin and not being emptied into an appropriate waste container with a properly sealed lid.

Violation #2: PTI #15-1121 issued June 22, 1994 for the Firbimatic 380 installation states that the source is to be maintained in accordance with good engineering practices and the recommendations of the respective manufacturer in order to minimize air contaminant emissions. Therefore, failure to comply with such permit T & C's would again constitute a violation of OAC rule 3745-31-05 with regard to the PTI and a violation of OAC rule 3745-35-02 with regard to the PTO.

Finding #3: The Permit to Operate an air contaminant source for the dry cleaning source ID 1576051343, received by this Agency, would have expired in May, 2003.

Violation #3: Operating a source of air contaminants without a PTO is a violation of OAC 3745-35-02. Within 30 days of receipt of this letter, please submit the enclosed PTO for this source to this agency.

Actions: The Blair's operation at the Cleveland Ave. NW location needs to come into compliance with all MACT and permit requirements including all record keeping specifications which are to be kept accurate as well as current. Please note that a PTO renewal application and accompanying emission unit form #3846 is to be filed with this Agency for the cited operation and will be processed as time allows by this Agency's permit processors. However, please also note that permit renewals cannot be issued to a facility not in compliance with applicable regulations.

This letter also serves as notices that by July 28, 2008, remove any transfer machines from service and by **July 28, 2008**, begin using a halogenated hydrocarbon detector or perc gas analyzer to check all equipment **monthly** for leaks for machines installed prior to December 21, 2005. This is in addition to the weekly perceptible leak checks above. Leak checks performed with a halogenated hydrocarbon detector or a perc gas analyzer can count as a perceptible leak check. If the machine was installed after December 21, 2005, this monitoring must begin by **July 27, 2006**, or upon start up.

After 45 days of your receipt of this letter, a member from this Agency may complete another follow-up inspection at the Cleveland Ave. NW Blair's Cleaners location to verify compliance with this Agency's requests, based on OAC regulations and MACT standards.

<u>Requested BC Action and Compliance Milestone:</u>	<u>Completion Date:</u>
1. Review dry cleaner MACT and facility permit requirements by:	Upon receipt of this letter.
2. Implement and maintain proper records regarding: a) weekly inspections of leaking components, b) repairs and maintenance, c) weekly refrigerated condenser outlet temperatures, d) monthly perc purchase records, including zeros and e) annual amount of fabric dry cleaned (as required) for dry-to-dry machines by:	Upon receipt of this letter.
3. Implement and maintain proper still waste handling procedures that would minimize emissions of perc into the ambient air by:	Upon receipt of this letter.
4. A summary of facility records must be submitted to this Agency on a yearly basis regarding: a) Leak inspection summary, b) perc usage (in gallons), c) annual amount of fabric dry cleaned (in pounds), d) dates of all non-compliant test results, e) authorized signature and date. (Form enclosed)	Must be received by this agency no later than January 31, 2009.
5. Remove any transfer machines from service:	By July 28, 2008.
6. Begin using a halogenated hydrocarbon detector or perc gas analyzer to check all equipment for leaks for machines installed prior to December 21, 2005.	By July 28, 2008.

Please note that immediate action on your part to bring the Cleveland Ave. NW Blair's Cleaners into compliance with the cited regulations and requirements does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the Ohio Revised Code ("ORC") 3704.06. The determination to pursue or to decline to pursue such penalties in this matter will be made at a later date.

Thank you for your time and cooperation in this matter. Should you have any questions concerning this letter, please call me at (330) 489-3385.

Sincerely,



Denny Tan

Staff Field Inspector II  
Air Pollution Control Division  
Canton City Health Department

Enc:

1. PTI issued, June 22, 1994
2. Dry cleaner's annual report;
3. PTO instructions and PTO form

Pc:

1. Addressee via certified mail
2. Facility file
3. March 2008 Correspondence file

7006 0810 0004 5529 3417

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)  
 For delivery information, visit our website at www.usps.com®  
 CANTON OH 44709

Postage	\$ 1.14	0702
Certified Fee	\$2.65	08
Return Receipt Fee (Endorsement Required)	\$2.15	Postmark Here: 
Restricted Delivery Fee (Endorsement Required)	\$0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 5.94</b>	

Sent To: **BLAIR'S CLEANERS**  
 ATTN: JOHN P. FORADAS  
 Street, Apt. No., or PO Box No.: **1913 CLEVELAND AVE NW**  
 City, State, ZIP+4: **CANTON OH 44709**

PS Form 3800, June 2002. See Reverse for Instructions.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature    <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)  <b>ELAINE HOFFMAN</b></p> <p>C. Date of Delivery  <b>3/10/08</b></p> <p><input type="checkbox"/> Is delivery address different from item 1? <input type="checkbox"/> Yes      if YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p><b>BLAIR'S CLEANERS</b>  <b>ATTN: JOHN P. FORADAS</b>  <b>1913 CLEVELAND AVE NW</b>  <b>CANTON OH 44709</b></p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail    <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered    <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail    <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number        (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee)    <input type="checkbox"/> Yes</p>
<p><b>7006 0810 0004 5529 3417</b></p>	