



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties  
117 South Main Street, Dayton, Ohio 45422-3280  
(937) 225-4435 – Fax: (937) 225-3486

[www.rapca.org](http://www.rapca.org)

May 16, 2013

### Certified Mail

Boyd Cleaners, Inc.  
Mr. Chris Boyd  
501 East Main Street  
Greenville, Ohio 45331

### Warning Letter

Re: Ohio EPA Premise No. 0819070229  
Emissions Unit –D001-Forenta Model M-245

Dear Mr. Boyd:

On April 25, 2013, the Regional Air Pollution Control Agency (RAPCA) conducted an inspection at Boyd Cleaners, Inc. located at 501 East Main Street, Greenville, Ohio. At this location, Boyd Cleaners operates a Forenta M-245 dry cleaning machine which uses perchloroethylene (perc). National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart M requirements are incorporated into the Permit to Install and Operate (PTIO) P0111454 issued January 14, 2013. During the inspection on April 25, RAPCA provided Boyd Cleaners with information on how to use the Ohio EPA Dry Cleaning Compliance Calendar.

RAPCA documented that Boyd Cleaners was not performing all of the required recordkeeping as found in PTIO P0111454, on a consistent basis. Term and Condition 1.d) Monitoring and /or Recordkeeping Requirements; (1) Lists several components that shall be visually **inspected each week** for perceptible leaks while the dry cleaning system is operating. (2) These same components are to be **inspected monthly** for vapor leaks using a halogenated hydrocarbon detector or PCE gas analyzer while the dry cleaning system is operating. You may use the hydrocarbon detector to perform all inspections, both the weekly and the monthly. (3) b. Requires you to ensure the condenser outlet side is operating at or below 45 degrees F prior to the end of the cool-down or drying cycle **on a weekly basis**. (4) Requires you to record and keep records of weekly inspections, temperature readings, repairs, yearly perchloroethylene consumption, and to keep these records for a period of five years. The records found missing

were weekly checks for leaks, what parameters were checked by facility staff, the amount of fabric dry-cleaned in pounds, and no repair records were found. The failures properly keep records, on a consistent and accurate basis is a violation of 40 CFR Part 63 Subpart M and PTIO P0111454.

Boyd Cleaners was verbally notified of these issues and that they would be receiving this Warning Letter during the inspection. In approximately one month, RAPCA will visit this facility again to ensure that the proper monitoring and recordkeeping has been instituted.

Boyd Cleaners is required to submit a written statement to RAPCA before **May 31, 2013**, containing your commitment to check the dry-cleaning equipment for leaks, record the weekly leak checks, maintenance, refrigerated condenser cooling temperature, as well as, all other monitoring, recordkeeping and recordkeeping required by PTIO P0111454, and to do so at the intervals required.

Thank you for your continued cooperation. If you have any questions regarding this matter, please feel free to contact me at (937)496-3153.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert D. Wade". The signature is fluid and cursive, with a long horizontal stroke at the end.

A. Dean Wade, APCS-II  
Air Pollution Control Specialist  
Abatement Unit

CC: Jefferis R. Canan, RAPCA (via E-mail)  
Bruce Weinberg, Ohio EPA (via E-mail)  
Brian Dickens, U. S. EPA (via E-mail)