



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

March 28, 2012

Franklin County  
Mint Dry Cleaners  
Facility ID: 0125042048  
Notice of Violation

Mr. Choon Kwon  
Mint Dry Cleaners  
7434 Sawmill Road  
Columbus, OH 43235

Re: **Notice of Violation**  
**2012 Compliance Inspection**

Dear Mr. Kwon:

On March 14, 2012 and March 19, 2012, Ohio EPA Central District Office (CDO) conducted a Full Compliance Evaluation (FCE) of Mint Dry Cleaners, in Columbus, Ohio. The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's air permits along with state and federal rules and regulations.

The compliance evaluation of your facility comprised of emissions unit D001: a 40 pound capacity dry-to-dry cleaning machine with a refrigerated condenser. On June 9, 2010, Mint Dry Cleaners was issued a permit to install and operate (P0083127) for emissions unit D001.

Compliance was assessed based upon an examination of the emissions unit at the facility, an examination of monitoring and recordkeeping files maintained at the facility and a review of compliance reports and fee emissions reports maintained at CDO. Below is a summary of the inspection findings, violations (if any), and action items that need to be addressed.

1. **Finding**

During the review of records maintained at the facility, CDO staff observed that monitoring and recordkeeping were not being conducted in accordance with the requirements of PTIO P0083127, OAC rule 3745-21-09(AA) and 40 CFR Part 63, Subpart M as follows.

Section C.d) of PTIO P0083127 contains monitoring and recordkeeping requirements of OAC rule 3745-21-09(AA) and 40 CFR Part 63, Subpart M and states:

- "(2) *The temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser shall be measured weekly with a temperature sensor. The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to*

*measure a temperature of 45 degrees Fahrenheit to an accuracy of plus or minus 2 degrees Fahrenheit. If the outlet temperature is higher than 45 degrees Fahrenheit, adjustments or repairs shall be made to meet that value. Repair parts shall be ordered within 2 working days after detecting a violation that needs repair parts. Repair parts shall be installed within 5 working days after they are received.*

- (3) *The following records shall be kept on site in a log for a period of not less than 5 years, and shall be made available upon request:*
  - a. *Receipts of all perchloroethylene purchases.*
  - b. *The volume of perchloroethylene purchased each month as recorded from perchloroethylene purchases. If no perchloroethylene is purchased during a given month, then the entry in to the log shall be zero gallons.*
  - c. *The calculation and result of the yearly perchloroethylene consumption (12-month rolling summation), to be determined on the first day of each month.*
  - d. *The results of all visual inspections, including the dates when the dry cleaning system components are inspected for leaks and the name or location of dry cleaning system components where leaks are detected.*
  - e. *The dates of repair and records of written or verbal orders for repair parts.*
  - f. *The results and dates of all equipment monitoring required by this permit.*
- (4) *The following records shall be kept for a period of not less than three years:*
  - a. *Control equipment maintenance.*
  - b. *The amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds."*

Mint Dry Cleaners is required to monitor for leaks while the dry cleaning system is operating pursuant to 40 CFR 63.322(k) and (o)(1) that state:

- “(k) The owner or operator of a dry cleaning system shall inspect the system weekly for perceptible leaks while the dry cleaning system is operating. Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspection for perceptible leaks. The following components shall be inspected:*
- (1) Hose and pipe connections, fittings, couplings, and valves;*
  - (2) Door gaskets and seatings;*
  - (3) Filter gaskets and seatings;*
  - (4) Pumps;*
  - (5) Solvent tanks and containers;*
  - (6) Water separators;*
  - (7) Muck cookers;*
  - (8) Stills;*
  - (9) Exhaust dampers;*
  - (10) Diverter valves; and*
  - (11) All Filter housings.”*
- “(o) Additional requirements:*
- (1) The owner or operator of a dry cleaning system shall inspect the components listed in paragraph (k) of this section for vapor leaks monthly while the component is in operation.”*

The following table outlines the results of CDO's inspection of the monitoring and recordkeeping at Mint Dry Cleaners.

Monitoring/Record-keeping Requirement	Monitoring/Recordkeeping Maintained at Mint Dry Cleaners	Monitoring/Recordkeeping Not Maintained at Mint Dry Cleaners
PTIO Term C.d)(3)a.	One receipt of a perchloroethylene purchase dated June 27, 2011	Receipts of perchloroethylene purchased within the past 5 years, prior to June 27, 2011
PTIO Term C.d)(3)b. 40 CFR 63.324(d)(1)	15 gallons of perchloroethylene was purchased in June 2011	Except as noted in the previous column, the volume of perchloroethylene purchased each month during the past 5 years
PTIO Term C.d)(3)c. 40 CFR 63.324(d)(2)	None	Monthly calculations of the 12-month rolling summation of perchloroethylene consumed for the past 5 years
PTIO Term C.d)(3)d. OAC 3745-21-09(AA)(4)(b) 40 CFR 63.322(k) 40 CFR 63.324(d)(3)	Results of perceptible leak inspections conducted during the period of March 26, 2007 to July 2, 2007 as well as one conducted in March 2012	Except as noted in the previous column, weekly perceptible leak inspections from the past 5 years
PTIO Term C.d)(3)e. 40 CFR 63.324(d)(4)	None	The dates of repair and records of written or verbal orders for repair parts from the past 5 years
PTIO Term C.d)(3)f. 40 CFR 63.323(a)(1) 40 CFR 63.324(d)(5)	Temperature readings of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser from March 26, 2007 to July 2, 2007	Except as noted in the previous column, weekly results and dates of the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser from the past 5 years
PTIO Term C.d)(4)a. OAC 3745-21-09(AA)(4)(a)	None	Control equipment maintenance from the past 3 years
PTIO Term C.d)(4)b. OAC 3745-21-09(AA)(4)(d)	The pounds of fabric dry cleaned from March 26, 2007 to July 2, 2007 and from February 28, 2012 to March 8, 2012	The pounds of fabric dry cleaned with perchloroethylene from January 1 to December 31 during each of the past 3 years
40 CFR 63.322(o)(1) 40 CFR 63.324(d)(3)	One vapor leak inspection conducted in March 2012	Except as noted in the previous column, monthly vapor leak inspections since July 28, 2008

**Violation**

Failure to conduct monitoring and maintain records as outlined in the table above is considered a violation of the terms and conditions of PTIO P0083127, OAC rule 3745-21-09(AA) and 40 CFR Part 63, Subpart M. Violations of the terms and conditions of an issued PTIO are also considered violations of Ohio Revised Code (ORC) 3704.05(C), which states:

*"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

**Requested Action**

Mint Dry Cleaners should immediately begin to conduct monitoring and maintain records in accordance with the terms and conditions of PTIO P0083127 and the requirements of OAC rule 3745-21-09(AA) and 40 CFR Part 63, Subpart M. EPA requests that Mint Dry Cleaners submit a copy of one month of records to CDO, Division of Air Pollution Control, within 45 days of receipt of this letter.

**2. Finding**

During the review of compliance reports submitted to Ohio EPA, CDO staff observed that reporting was not being conducted in accordance with the requirements of PTIO P0083127. Mint Dry Cleaners failed to submit annual permit evaluation reports for reporting years 2010 and 2011.

Section C.e)(3) of PTIO P0083127 contains the requirements of OAC rule 3745-15-03(D) and states:

*"Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit."*

The due date of Mint Dry Cleaners' annual PER is February 15.

**Violation**

Failure to submit PERs for reporting years 2010 and 2011 is considered a violation of the terms and conditions of PTIO P0083127, OAC rule 3745-15-03(D) and ORC 3704.05(C).

**Requested Action**

Ohio EPA requests that Mint Dry Cleaners submit their reporting years 2010 and 2011 PERs to CDO, Division of Air Pollution Control, within 45 days of receipt of this letter.

**3. Finding**

During the site inspection on March 14, 2012, CDO staff smelled perchloroethylene vapors leaking from the dry cleaning system while it was in operation. Additionally, CDO staff detected perchloroethylene vapor leaks using Mint Dry Cleaner's Inficon Tek-Mate perchloroethylene detector. Using Ohio EPA's photoionization detector, CDO staff recorded vapor leaks as high as 16 ppm around the dry cleaning system while it was in operation.

Section C.d)(1) of PTIO P0083127 contains the requirements of 40 CFR 63.322(m) and states:

*"Leaks are to be repaired within 24 hours after being found, or repair parts ordered within 2 working days after detecting a leak that needs repair parts. Repair parts shall be installed within 5 working days after they are received."*

**Requested Action**

CDO requests Mint Dry Cleaners provide a description of the steps taken to repair the vapor leaks in accordance with the timeframe established by 40 CFR 63.322(m) and PTIO P0083127. Please include a description of all the problems that were found upon inspection of the dry cleaning system and the parts and repairs that were required to fix them. This information should be submitted within 45 days of receipt of this letter

**4. Finding**

On March 14, 2012, CDO staff recorded 50 degrees Fahrenheit as the lowest observed temperature reading at the condenser outlet before the end of the drying cycle.

Section C.d)(2) of PTIO P0083127 contains the requirements of 40 CFR 63.322(n) and states:

*"If the outlet temperature is higher than 45 degrees Fahrenheit, adjustments or repairs shall be made to meet that value. Repair parts shall be ordered within 2 working days after detecting a*

*violation that needs repair parts. Repair parts shall be installed within 5 working days after they are received."*

**Requested Action**

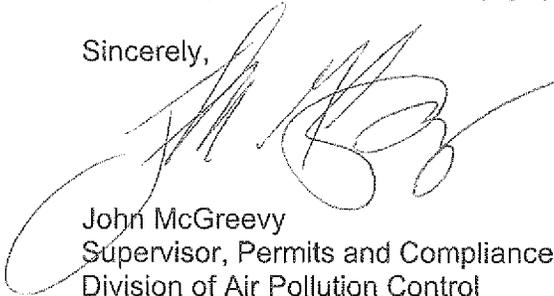
CDO requests Mint Dry Cleaners provide a description of the steps taken to address the elevated temperature at the condenser outlet in accordance with the timeframe established by 40 CFR 63.322(n) and PTIO P0083127. This information should be submitted within 45 days of receipt of this letter

Additionally, CDO staff are concerned that the location of a shelving unit next to the temperature gauge may obstruct and compromise the integrity of temperature readings. Access to the temperature gauge should be free of obstructions.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the ORC Section 3704.06. Submittal of the above requested information, including records and reports, does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC Section 3704.06. The determination to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions, please do not hesitate to contact Pam McCoy by phone at (614) 728-3810 or by e-mail at [pam.mccoy@epa.ohio.gov](mailto:pam.mccoy@epa.ohio.gov).

Sincerely,



John McGreevy  
Supervisor, Permits and Compliance  
Division of Air Pollution Control  
Central District Office

c: Adam Ward, Manager, DAPC/CDO  
John Paulian, Supervisor, DAPC/CO

e: John McGreevy, Supervisor, DAPC/CDO