



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

February 26, 2013

Certified Mail

Perfect Cleaners
Mr. Mark Matejousky
8520 North Dixie Drive
Dayton, Ohio 45414

Warning Letter

Re: Ohio EPA Premise No. 0857703195
Emissions Unit –D001-Union L 760 U 2000

Dear Mr. Matejousky:

On February 15, 2013, the Regional Air Pollution Control Agency (RAPCA) conducted an inspection at Perfect Cleaners located at 8520 North Dixie Drive, Dayton, Ohio. At this location, Perfect Cleaners operates a Union L 760 U 2000 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) P0112305 issued January 25, 2013. During the inspection on February 15, RAPCA provided Perfect Cleaners with a perc hydrocarbon detector because the facility contact informed me that they had no detector at that time.

RAPCA documented that Perfect Cleaners was not performing the required monitoring and recordkeeping requirements found in PTIO P0112305. Term and Condition 1.d) Monitoring and /or Recordkeeping Requirements; (1) list 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 failure to inspect, monitor, and keep records is a violation of 40 CFR Part 63 Subpart M and PTIO P0112305.

During the inspection the temperature of the outlet of the condenser did reach 36 degrees Fahrenheit, which is below the requirement of 45 degrees Fahrenheit, and does demonstrate compliance. In addition, there were no leaks detected during the operation of the machine during the cleaning cycle.

Also upon my review of the Perfect Cleaners facilities files, RAPCA was unable to locate the Initial Notification Report, the Compliance Report for Pollution Prevention, and the Compliance Report for Control Requirements. Each one of these reports should have been submitted after the replacement of any dry cleaning machine or upon initial installation of a machine. If Perfect Cleaners has already submitted these reports, please forward RAPCA a copy of each report so that RAPCA has a complete facility file. In case Perfect Cleaners has not submitted these reports, RAPCA hand delivered a copy of each one during the inspection. If Perfect Cleaners has not submitted a copy of these reports, please complete the forms and submit the original copy to the Region V Dry Cleaner Contact---John Kelly (AR-18J), U. S. EPA Region V, 77 W. Jackson Boulevard, Chicago, Illinois, 60604. Also please provide RAPCA a copy.

Perfect 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.

Perfect Cleaners is required to submit a written statement to RAPCA before **March 26, 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 P0112305. In addition, if Perfect Cleaners is unable to find record of the submittal of the Initial Notification Report, the Compliance Report for Pollution Prevention, and the Compliance Report for Control Requirements please include these documents with your written commitment.

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. 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)