

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
DRY CLEANER INSPECTION**



SOURCE INFORMATION	
<u>SOURCE NAME</u>	Griffland Village Cleaners
<u>SOURCE LOCATION</u>	3911 E. 45 th Street Highland, IN 46322 Lake County
<u>MAILING ADDRESS</u>	3911 E. 45 th Street, Highland, IN 46322
<u>PLANT ID</u>	089-D3084
<u>PERMIT INFORMATION</u>	The source does not have an air permit.
<u>ATTAINMENT STATUS</u>	<input type="checkbox"/> Attainment for all criteria pollutants <input checked="" type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input checked="" type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5}
<u>SOURCE DESCRIPTION</u>	<input type="checkbox"/> Not a dry cleaning facility <input checked="" type="checkbox"/> Dry cleaning facility that: <input checked="" type="checkbox"/> uses PCE <input type="checkbox"/> does not use PCE <input checked="" type="checkbox"/> NESHAP Subpart M* applies <input type="checkbox"/> NESHAP Subpart M* does not apply to this source

*NESHAP Subpart M: National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities incorporated by reference via 326 IAC 20-7-1. The provisions apply to owner/operators of each dry cleaning facility that use PCE.

INSPECTION INFORMATION			
<u>INSPECTED BY</u>	Sasa Dunovic		
<u>INSPECTION DATE AND TIME</u>	12/9/2020	TIME IN: 3:00 p.m.	TIME OUT: 3:45 p.m.
<u>REPORTED BY</u>	Sasa Dunovic <i>MHY</i> 12/17/2020	REPORT DATE: 12/14/2020	
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
<u>INSPECTION OBJECTIVE(S)</u>	<input type="checkbox"/> Commitment <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Other:		
<u>ACES TRACKING NUMBER(S)</u>	Inspection: 253104	Complaint: 252791	Violation/Warning: 253148
<u>RM TRACKING NUMBER(S)</u>	Complaint: 94327		
<u>INSPECTION BACKGROUND</u>	<ul style="list-style-type: none"> On November 28, 2020, the U.S. Environmental Protection Agency (EPA) received an odor complaint indicating that Griffland Village Cleaners does not properly ventilate its chemicals and that there is an extremely strong chemical smell that causes the complainant's chest to hurt and gives him feelings of lightheadedness. The complainant indicated that this is an ongoing problem. The complaint was forwarded to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) on December 1, 2020. The most recent inspection of Griffland Village Cleaners was conducted on November 23, 1999, with no violations determined. 		

SOURCE PERSONNEL INTERVIEWED			
Mr. Jung Park	Owner	(219) 924-9622	jeonjuchicago@yahoo.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)
None.

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)
None.

NESHAP Subpart M: PCE Dry Cleaning Facilities – Area Sources of HAPs & Dry-to-Dry Machines only			
Equipment and Control Devices:			
The facility has dry-to-dry machine(s) only (i.e. washing and drying performed in the same machine), including:			
Dry-to-dry Machine ID(s)	Date(s) commenced construction/reconstruction	Control Device(s)	
Firbimatic Axial 40	2008	Both Refrigerated Condenser and Carbon Adsorber	
All Units			
PCE Consumption			
<ul style="list-style-type: none"> Per §63.323(d)(1-3), source shall calculate total yearly PCE consumption by recording (on the first day of every month) the sum the volume of all PCE purchases in previous 12 months in a log described in §63.324(d)(1). Zero purchases for a given month is considered zero consumption in gallons for that month. (§63.323(d)) If yearly PCE consumption < 2,100 gal/year, source is an owner/operator that is an Area Source If yearly PCE consumption is < 140 gal/year, source may be exempt from parts of the rule 			
Requirements for All Units			
Citation	Requirement	Violation(s) Noted	
§63.323(d)(1-3)	Shall calculate total yearly PCE consumption as required (see above). Total yearly PCE consumption is 40 gal/year.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
§63.322(c)	Always keep door closed	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
§63.322(d)	Operate and maintain the system according to the manufacturers' specifications and recommendations	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
§63.322(i)	Drain all cartridge filters in their housing or other sealed container for a minimum of 24 hours before removal	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
§63.322(j)	Store PCE in tanks or containers with no leaks, except containers for separator water that may be uncovered as necessary for proper operation of the machine and still	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
§63.322(k), §63.322(l)	Inspect the system weekly (or biweekly if PCE consumption is < 140 gal/year) for perceptible leaks during operation, including: (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.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
§63.322(m)	Repair leaks within 24 hours. Parts must be ordered within 2 working days of detection, if necessary, then installed within 5 working days of receipt.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
§63.322(o)(1)(i), §63.322(o)(1)(iii)	Conduct monthly inspections of components in (k) above using a halogenated hydrocarbon detector or PCE gas analyzer by placing the probe inlet at the surface of each component interface where leakage could occur and moving slowly along the interface periphery. These inspections satisfy the requirements of §63.322(k) or (l)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
§63.324(d)	For 5 years, keep PCE records and a log with: (1) Monthly volume purchased (2) Yearly PCE calculations (3) Dates of leak inspections and where leaks detected (4) Dates of repair and records of orders for repair parts (5) Date and monitoring results if a refrigerated condenser is used to comply with §63.322(a), (b), or (o) (6) Date and monitoring results if a carbon adsorber is used to comply with §63.322(a)(2), or (b)(3)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
§63.324(e)	Retain onsite copies of design specifications and operating manuals	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
§63.324(a)	Submit a notification in writing after 6/18/1994 with: (1) Name and address (2) Address (physical location) (3) Description of equipment (4) Yearly PCE consumption or previous year estimate per §63.320	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

NESHAP Subpart M: PCE Dry Cleaning Facilities – Area Sources of HAPs & Dry-to-Dry Machines only			
	(5) Description of the control device(s)		
§63.324(b)	Submit a notification of compliance status within 30 days of startup with: (1) Yearly PCE consumption limit based upon consumption (2) Whether or not they are in compliance with §63.322 (3) Signed by a responsible official who shall certify its truth & accuracy	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.324(f)	Submit a notification of compliance status on or before 7/28/2008 with: (1) Name and address of the owner or operator (2) Address (physical location) of the facility (3) If in a building with a residence(s), even if residence is vacant (4) If in a building with no other tenants, leased space, or owner occupants (5) Whether major or area source (6) Yearly PCE consumption (§63.323(d)) (7) Whether or not they are in compliance with §63.322 (8) Signed by a responsible official who shall certify its truth & accuracy	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Requirements related to Specific Applicability and/or Control Equipment			
<input type="checkbox"/> Source has “Existing” unit(s) (commenced construction/reconstruction before 12/9/1991) <input checked="" type="checkbox"/> Source has “New” unit(s) (commenced construction/reconstruction on or after 12/9/1991)			
Existing Unit(s) Only			
Citation	Requirement	Violation(s) Noted	
§63.322(a)(1,2)	Either route PCE emissions through a refrigerated condenser or equivalent device, or (if installed prior to 9/22/1993) a carbon adsorber.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.323(b), §63.323(b)(1), §63.323(b)(2), §63.323(b)(3), §63.322(g)(2)	If complying with §63.322(a)(2) above using a carbon adsorber, conduct weekly PCE measurements with a colorimetric detector tube or PCE gas analyzer to determine that PCE in the carbon adsorber exhaust is ≤ 100 ppm by volume while machine is venting to the adsorber at the end of the last cleaning cycle prior to desorption or removal of activated carbon. <ul style="list-style-type: none"> Use a colorimetric detector tube or gas analyzer designed to measure PCE in air to concentrations of 100±25ppm by volume Use the colorimetric detector tube or PCE gas analyzer according to the manufacturer's instructions Provide a sampling port for monitoring that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance. 	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
New Unit(s) Only			
§63.322(b)(1)	Route PCE emissions through refrigerated condenser or equivalent device.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
New Unit(s) at all facilities OR Existing Unit(s) at facilities with yearly PCE consumption ≥ 140 gal/year			
§63.322(e)(1)	For unit(s) controlled by a refrigerated condenser, shall not vent or release PCE emissions while drum is rotating	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.322(e)(2), §63.323(a)(1)	For unit(s) controlled by a refrigerated condenser, conduct weekly monitoring of high and low pressure during drying phase OR outlet gas temperature before the end of the drying cycle while gas is flowing through. Monitored pressure shall be in a range specified by the manufacturer and monitored temperature shall be ≤ 7.2°C (45°F). Sensors shall be used according to manufacturer instructions. The temperature sensor shall be designed to measure a temperature of 7.2 ±1.1°C (45 ±2°F).	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.322(e)(3)	Prevent air being drawn in through the door from passing through a refrigerated condenser	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.322(g)(1)	For unit(s) controlled by a carbon adsorber, shall not vent or release PCE at any time	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.322(n)	If monitor parameter values from §63.322(e) or (g) are not met, parts must be ordered within 2 working days of detection, if necessary, then installed within 5 working days of receipt.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.324(c)	If source reaches 2,100 gal/year yearly PCE consumption, submit a notification of compliance status by registered mail signed by a responsible official with a new consumption limit, whether or not in compliance with §63.322, and a statement of truth and accuracy.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

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Unit(s) located in a building with a residence (i.e. dwelling where people reside for 180 or more days)				
Citation	Installed	Requirement	Violation(s) Noted	
§63.322(o)(2), §63.322(o)(5)(ii) (B)	After 12/21/2005	Route emissions through refrigerated condenser and from inside the drum through a non-vented carbon adsorber or equivalent control device immediately before the door is opened. The carbon adsorber must be desorbed in accordance with manufacturer's instructions.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.322(o)(4)	After 12/21/2005	Owner/operator shall eliminate any PCE emissions	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.322(o)(5)(i)	Any Time	Starting on 12/21/2020, all owner/operators shall eliminate any PCE emissions	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.322(o)(5)(ii) (A)	12/21/2005 through 7/12/2006	System shall operate inside vapor barrier enclosure, for which an exhaust system operates during operation and maintenance. Enclosure entry door may only be open when a person is entering or exiting the enclosure.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
§63.322(o)(5)(ii) (C)	12/21/2005 through 7/12/2006	Inspect components in (k) for leaks weekly during operation using a halogenated hydrocarbon detector or PCE gas analyzer by placing the probe inlet at the surface of each component interface where leakage could occur and moving slowly along the interface periphery	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Observations and Comments:				
<p>On November 28, 2020, the U.S. Environmental Protection Agency (EPA) received an odor complaint indicating that Griffland Village Cleaners does not properly ventilate its chemicals. Mr. Spencer Newell, the complainant, indicated that there is an extremely strong chemical smell that causes his chest to hurt and gives him feelings of lightheadedness. Additionally, Mr. Newell indicated that this is an ongoing problem.</p> <p>On December 2, 2020, I initiated a complaint investigation and contacted Mr. Newell through a telephone call to obtain more information on the complaint. During the call, Mr. Newell informed me that he works at Schoop's Hamburgers, which is located in the same building as Griffland Village Cleaners. Mr. Newell indicated that he mostly works midnight shifts and Saturday mornings and that the odor is especially noticeable on Saturday mornings. Additionally, Mr. Newell stated that he detects odor only inside the building and has not detected it outside so far. The building is a small business building with four (4) different businesses located in it. Two businesses are restaurants, one is vacant, and the fourth business is Griffland Village Cleaners. There are no visible physical connections between the businesses (ventilation, etc.).</p> <p>On December 9, 2020, I visited Griffland Village Cleaners. Upon arrival, outside surveillance of the building was conducted from the public right-of-way. No chemical odors were detected outside of the building. Upon entering the Griffland Village Cleaners, I was greeted by Mr. Jung Park, the facility owner. I explained the nature of my visit and asked Mr. Park whether they use perchloroethylene (PCE) for dry cleaning. Mr. Park indicated that they use about forty (40) gallons of this chemical per year. Invoices and yearly PCE calculations supported this claim. While inside the cleaning facility, I did not detect any chemical odors that match the complainant's description.</p> <p>Mr. Park showed me the PCE dry cleaning unit. Griffland Village Cleaners uses one (1) Firbimatic Axial 40 dry cleaning unit. The unit is the fourth generation Dry-to-Dry Enclosed Machine equipped with a refrigerated condenser and a carbon adsorber. The unit looked in good working condition. At the inspection time, the unit was not in operation but still warm from the morning cleaning cycle. The unit door was closed. I did not observe any leaks, liquids, or odors around the unit. Mr. Park indicated that they use this unit almost every day for just one cleaning cycle.</p> <p>I asked Mr. Park how they comply with the requirements of CFR 63, Subpart M. Mr. Park was not aware of this rule, but he explained to me that he inspects the system every morning and every day for perceptible leaks during cleaning. He stated that he also checks the temperature gauge on the refrigerated condenser, but that he does not keep any records of these monitoring activities. Additionally, he indicated that he does not conduct monthly inspections of the dry-cleaning unit's components using a halogenated hydrocarbon detector or PCE gas analyzer.</p> <p>When I asked Mr. Park to describe his Saturday activities and routines at the facility, he indicated that he opens the unit's lint filter door for 5-10 minutes to clean accumulated lint and scoop any liquids inside the filter socket every Saturday, early in the morning, while the unit is not operating. He disposes of this material in one of the closed 30-</p>				

NESHAP Subpart M: PCE Dry Cleaning Facilities – Area Sources of HAPs & Dry-to-Dry Machines only

gallon drums. At the time of the inspection, the facility had one (1) 30-gallon drum of spent PCE and one (1) drum of spent filters. The drums were closed and labeled. When I asked why early in the morning, Mr. Park stated that this is the best time for this activity because there are some unpleasant odors during the cleaning process and that at that time, the facility is closed. I asked if this is a standard work practice for this type of dry-cleaning unit. Mr. Park told me that he inherited this practice from the previous owner. Mr. Park indicated that he owns the shop and has operated the PCE dry cleaning unit since 2014. The unit was installed by the previous owner in 2008.

Since Mr. Park did not have copies of design specifications and operating manuals that could support his unit's cleaning procedure, I contacted the manufacturer's representative and obtained a copy of the use and maintenance handbook. I verified that the manufacturer recommends that the lint filter should be opened, lint removed and cleaned weekly.

Other observed equipment in the shop are: four (4) washing units and one (1) drying unit. Mr. Park indicated that they actively use only one washing and the drying machine. I checked what other chemicals are used in the shop and found that the facility uses only laundry detergents and bleach. None of these chemicals emit the chemical odors that the complainant described.

After the inspection of the cleaning shop, I went to Schoop's Hamburgers to try to detect any chemical odors. While inside the restaurant, I detected no chemical odors.

On December 14, 2020, Mr. Park informed me that he decided to remove the PCE dry cleaning unit from the facility by February 2021. The facility will stop using perchloroethylene (PCE) for dry cleaning. On the same day, I explained my findings and conclusions to Mr. Newell.

I recommend that an Inspection Summary / Violation Letter be issued, the complaint closed, and the Griffland Village Cleaners be inspected again in a year. The subsequent inspection should verify that this facility has removed the PCE dry cleaning unit, verify that the monitoring records are being kept, and stopped using perchloroethylene (PCE) for dry cleaning.

ADDITIONAL SOURCE COMPLIANCE REVIEW:

Compliance assistance was provided during the inspection. Yes No N/A

Additional Information and Comments:

I gave Mr. Park a copy of Drycleaning NESHAP Compliance Summary, which can be found at the Compliance and Technical Assistance web site <https://www.in.gov/idem/ctap/2358.htm>.

INSPECTION FINDINGS

- No violations were observed or determined at the time of the inspection.
- The following violations were determined at the time of the inspection:

Condition/Citation	Description of Violation(s)
§63.322(o)(1)(i), §63.322(o)(1)(iii)	Griffland Village Cleaners failed to conduct monthly inspections of the perchloroethylene dry cleaning unit's components using a halogenated hydrocarbon detector or PCE gas analyzer.
63.324(d)	Griffland Village Cleaners failed to keep inspection logs and monitoring results.
63.324(e)	Griffland Village Cleaners failed to retain onsite copies of design specifications and operating manuals.

RECOMMENDED ACTION Issue inspection summary/violation letter.

EXIT INTERVIEW I explained my findings, recommendations, and conclusions with Mr. Park prior to exiting the facility.



Indiana Department of Environmental Management

RM Record

Description

Incident # 94327

Received By: Dunovic, Sasa

Received Date: 11/28/2020 11:28 am

Incident Description: I work next to Griffland Dry Cleaners and they do not properly ventilate their chemicals. Most mornings there is an extremely strong chemical smell that causes my chest to hurt and gives feelings of lightheadedness. This is an ongoing problem.

Incident Type: Complaint-Air Odor

Occurred Date/Time: 11/28/2020 11:28 pm

End Date: 12/14/2020 10:00 am

Regulatory Program: Air

Incident Status: Closed

Closure Method: Violations/Appropriate Action

Lead Investigator: Dunovic, Sasa

Resolution Desc: Aces IDs: 252791, 253104, 253148

A dry-cleaner facility inspection was conducted on 12/9/2020. It was recommended that an Inspection Summary / Violation Letter be issued, the complaint closed, and the Griffland Village Cleaners be inspected again in a year. The subsequent inspection should verify that this facility has removed the PCE dry cleaning unit and stop using perchloroethylene (PCE) for dry cleaning.

A copy of the Inspection Report will be placed in IDEM's Virtual File Cabinet (VFC) within 14 days and available at <https://vfc.idem.in.gov/DocumentSearch.aspx>. The Inspection Report can be found in VFC by using the following search criteria:

- Program: OAQ
- Document Type: Inspection
- In Alternate Field, choose Air Source ID
- In the ID # field, enter the Source ID (089-D3084)

Location

Location Description: Griffland Cleaners at 3911 45th Street, Highland

County: Lake

Municipality: Highland



Indiana Department of Environmental Management RM Record

Source Entity

Source Type: Agency Interest

Source Entity Name: Griffland Village Cleaners

Address 1: 3911 45th St

Municipality: Highland

County: Lake

State: IN

Zip Code: 46322

Telecom: Business phone number 1 219-924-9622

Reporter

Reporter Type: Private Citizen

Name: Spencer Newell

State: IN

Comments: The complaint was forwarded from the USEPA on 12/1/2020.

Telecom: Cellular phone number 1 219 781-4805
Email address 1 newellspencer@gmail.com

Actions

Task	Staff Assigned	Start Date	Due Date	Completed Date	Hours Spent
Enter Initial Complaint Into	Dunovic, Sasa	12/01/2020		12/01/2020	
Comments: The complaint is entered into RM					
Date Initial Response	Dunovic, Sasa	12/01/2020		12/01/2020	
Comments: I started the complaint investigation.					
Provide Acknowledgement	Dunovic, Sasa	12/01/2020		12/01/2020	
Comments: I have called the complainant to obtain more info on the complaint.					
Investigate Complaint	Dunovic, Sasa	12/09/2020		12/09/2020	
Comments: A dry-cleaner facility inspection was conducted.					
Update & Close Complaint in	Dunovic, Sasa	12/14/2020		12/14/2020	
Comments: The complaint was closed.					