

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

N547030144

<b>FACILITY:</b> BARYAMES CLEANERS INC	<b>SRN / ID:</b> N5470
<b>LOCATION:</b> 2423 S CEDAR ST, LANSING	<b>DISTRICT:</b> Lansing
<b>CITY:</b> LANSING	<b>COUNTY:</b> INGHAM
<b>CONTACT:</b> Cory Bennett , Maintenance Supervisor	<b>ACTIVITY DATE:</b> 07/09/2015
<b>STAFF:</b> Nathaniel Hude	<b>COMPLIANCE STATUS:</b> Compliance
<b>SOURCE CLASS:</b> SM OPT OUT	
<b>SUBJECT:</b> Unannounced inspection serving as initial contact. Found compliant with PTI 471-96 and 40CFR63 M.	
<b>RESOLVED COMPLAINTS:</b>	

**Inspection Report**

N5470- Baryames Cleaners  
2423 S. Cedar St, Lansing, Michigan

**Inspection Date:**

7/9/15

**Facility Contacts:**

Cory Bennett- Maintenance Manager, 517-484-8900, [corybennett777@yahoo.com](mailto:corybennett777@yahoo.com)  
Art Baryames – Owner, 517-484-8900 ext. 205, [art@baryamescleaners.com](mailto:art@baryamescleaners.com)

**MDEQ AQD Personnel:**

Nathan Hude – 517-284-6779, [huden@michigan.gov](mailto:huden@michigan.gov)

**Facility Description:**

Air use Permit to Install #471-96 was issue to Baryames for the installation of three 80 pound and two 120 pound dry-to-dry cleaning machines using perchloroethylene (perc), a Hazardous Air Pollutant (HAP). When the permit was issued, the potential to emit perc was determined to exceed the single HAP threshold of 10 tons per year. The issued permit included an enforceable restriction on the use of perc of no greater than 9.0 tons in a 12-month rolling time period by restricting usage to 1,890 gallons. The restriction changed the status of the source to a synthetic minor of Hazardous Air Pollutants, allowing Baryames to opt-out of the CAA Title 5 Renewable Operating Permit program.

Baryames is also an "Area Source" as defined by the MACT NESHAP subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities. Baryames is subject because they use perchloroethylene.

**Applicable Regulations:**

1. MI-PTI-471-96
2. 40CFR63, Subpart M- National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities

**Previous Inspections:**

4/15/2011- Brian Culham, no violations noted  
6/03/2009- Michael McClellan, no violations noted

**This Inspection Key Concerns:**

1. Leak identified on machine 5 (120lbs machine) leading to carbon filter. Informed Cory he has 24 hrs. to fix IAW 40CFR 63.322 (m).
2. Weekly inspections for machine 5 missed 2 weeks of inspections via records check for weeks of 5/24/15 and 5/31/15.
3. Weekly inspections for machine 6 missed 6 weeks of inspections via records check for weeks of 5/17/15, 5/24/15, 5/31/15, 6/7/2015, 6/14/15, 6/21/2015, yet Cory stated they were done and he thought he only needed to record on one sheet (that of machine 5). Thus they were only missing 2 weeks of inspections for the weeks of 5/24/15 and 5/31/15.

**Emission Unit Summary Table**

None.

**Inspection Summary**

I arrived onsite at 0900 for an unscheduled and unannounced inspection. This was also an initial contact as the facilities new Air Inspector. I did not notice any odors or visual environmental concerns around or while entering the facility.

An individual at the front desk paged Cory Bennett for me as they told me Dan Trickey was no longer with the company. Cory met me and we went into the conference room. I provided him with the inspection brochure and a copy of the boiler MACT brochure while explaining the purpose of my visit. Cory informed me that they do have a boiler onsite and I informed him that we would look at it as part of the inspection. We discussed the permit and subpart and how I planned to perform the inspection by checking for compliance with the conditions listed.

Our first stop was the boiler. The natural gas boiler data plate listed Johnston Boiler Company with a manufacture date of 1987. It had a maximum but of 8,370,000 btu's and a minimum of 2,510,000 btu's. An inspection sticker was located near the data plate stating it was inspected on 5/30/15 by Hartford Steam Boiler and the next required inspection was 5/30/16. I informed Cory that I was not that familiar with 40CFR60 Subpart JJJJJJ, but I would check once arriving back at the office to see if it applied to their boiler. Once arriving back at the office, I found their boiler is not subject to 40CFR63 Subpart JJJJJJ- Industrial, Commercial, and Institutional Boilers Area Sources, due to being a "gas fired boiler", 63.11195(e).

We then went to the 120 lbs. machines. The two Columbia "dry-to-dry" machines, #5 and #6 were in operation during the inspection. I asked how the system worked and Cory brought over a worker named Jenn. They both informed me that the machine uses perc with no water for cleaning. The machine is an all-inclusive washer and dryer. The perc is drained like a normal washer and after the drying cycle a cooling cycle is completed. The machine then cools the contents to below 45 °F before the door can be opened (record checks indicated the temp averaged to be about 35°F). The only time the door can be opened otherwise is if the cycle is stopped, this is usually only done if a leak in the door seal is found. The perc goes bad after some time and is treated as hazardous waste once it begins to become colored (based on a visual color test).

While walking around the machines, we found a leak on machine 5 in the piping leading to carbon filter. Cory went to get some pipe wrenches and the leak detector. He attempted to tighten the fitting, but we could still see a leak visually and the detector was picking up a reading. I informed him that by regulation, he has 24 hours to fix it, to which he replied was not a problem.

All other machines located onsite were either exempt (Rule 285(f)) or were new machines that use DF-2000 solvent which is a synthetic aliphatic hydrocarbon and currently not regulated.

Art Baryames met us while we were around the machines and informed me that they planned to install 2 more machines that use DF-2000 and slowly phase out the perc machines. One machine is planned to be installed in October and the other machine is planned to be installed in March of 2016. I informed Art that I would check what and how it would affect his permit. If he phased perc out entirely, a permit may not be required unless the DF-2000 fluid is treated like a VOC, then the permit may change.

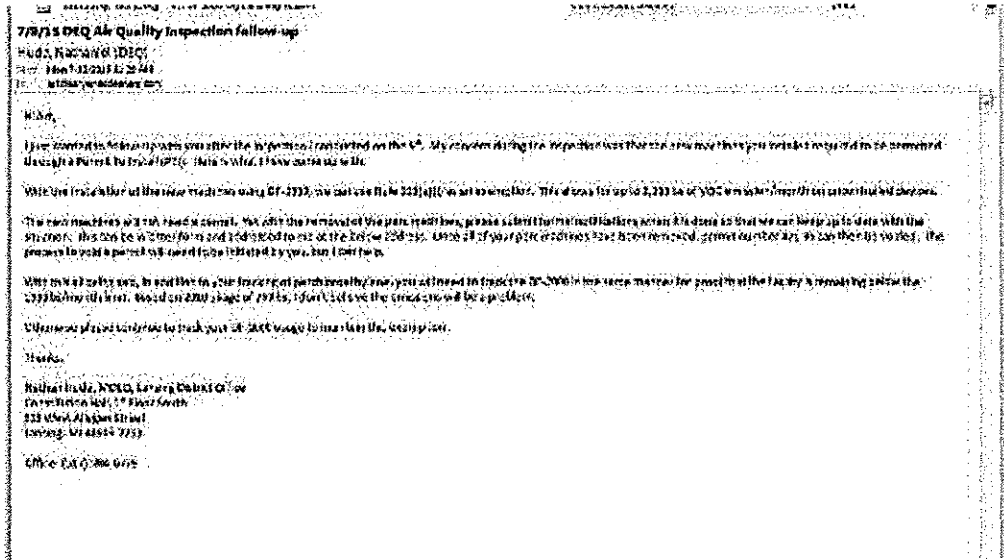
The permit restricts perchloroethylene purchases to 1,890 gallons in a 12 month time period which then keeps them under the 9 ton/year emission limit. Jennifer from the front office provided me with the order sheets from their distributor, EJ Thomas Company, for the two dry-to-dry machines. In 2014, a total of 450 gallons were used equaling 3.04 tons of perc lost. From June 2014 to June 2015, 540 gallons have been used.

Cory and I then went to the conference room where we discussed the maintenance checks by reviewing the requirements in 40CFR63, Subpart M. The MACT requires weekly checks for leaks and at least one of the weekly checks to be conducted while the machines are operating. Cory stated that all of the checks were performed while the machines were operating. A review of the inspection logs found data missing for machine 5 for the weeks of 5/24/15 and 5/31/15. Cory informed me that it was during the time that Dan had left and he had taken over. For machine 6, 6 weeks of inspections were not documented for the weeks of 5/17/15, 5/24/15, 5/31/15, 6/7/2015, 6/14/15, 6/21/2015, yet Cory stated they were done and he thought he only needed to record on one sheet (that of machine 5). Thus they were only missing 2 weeks of inspections for the weeks of 5/24/15 and 5/31/15 for the same reason as earlier stated.

Before leaving, I provided Cory with a copy of the MACT and permit 471-96. I found the site to be in compliance with the permit yet with deviations with 40CFR63 Subpart M for the inspection records for 63.322(k). I do not plan to write a violation due to our visual inspection of the units and the circumstances of the maintenance supervisor changes. I departed the site at approx. 1045.

On 7/11/15, I called Baryames and spoke with Cory Bennett, he stated that the leak identified on machine 5 was not complete yet due to the need of ordering a coupling. Since the part was needed to be ordered, this allowed for an extended repair timeframe per 63.322(m) of 2 days to order and 5 days to install once received. I asked Cory to call me once the leak was repaired.

On 7/13/15, I received a voicemail from Cory stating that the leak had been fixed on Friday the 10<sup>th</sup>. I also did some additional research and found that Baryames can use Rule 290(a)(i) as an exemption to the use of DF-2000. Although a VOC, it is non-carcinogenic and fits the exemption. I sent Art Baryames the attached email for future installations of DF-2000 machines and the removal of perc machines.



**Image 1 (Email) :** Email to Art Baryames regarding permit and exemption for new and old machines

NAME Art Baryames

DATE 8/11/15

SUPERVISOR \_\_\_\_\_

