



PERCHLOROETHYLENE DRY CLEANERS



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO:

AIRS ID#: 0870068 **DATE:** 08/29/07 **ARRIVE:** 0900 hrs **DEPART:** _____
FACILITY NAME: KEYS CLEANERS
FACILITY LOCATION: 6799 Overseas Hwy
 MARATHON 33050
RESPONSIBLE OFFICIAL: DJ NIELSEN **PHONE:** (305)743-8360
CONTACT NAME: DJ Nielsen **PHONE:** cell (305)0731, fax (305) 743-7527
 Email: erikdjnthn@comcast.net
REMITTANCE YEAR: 2007 **ENTITLEMENT PERIOD:** 10/9/2006 / 10/9/2011
 (effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check only one box)

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: FACILITY CLASSIFICATION - Rule 62-213.300 FAC

(check only one box in A)

- A. 1. **Existing small area source**
 dry-to-dry only, $x < 140$ gal/yr
 transfer only, $x < 200$ gal/yr
 both types, $x < 140$ gal/yr
 (constructed before 12/9/91)
 - 2. **New small area source**
 dry-to-dry only, $x < 140$ gal/yr
 transfer only, $x < 200$ gal/yr
 both types, $x < 140$ gal/yr
 (constructed on or after 12/9/91)
 - 3. **Existing large area source**
 dry-to-dry only, $140 \leq x \leq 2,100$ gal/yr
 transfer only, $200 \leq x \leq 1,800$ gal/yr
 both types, $140 \leq x \leq 1,800$ gal/yr
 (constructed before 12/9/91)
 - 4. **New large area source**
 dry-to-dry only, $140 \leq x \leq 2,100$ gal/yr
 transfer only, $200 \leq x \leq 1,800$ gal/yr
 both types, $140 \leq x \leq 1,800$ gal/yr
 (constructed on or after 12/9/91)
 - 5. **Ineligible for General Permit**
 drop store/out of business/petroleum
 facility exceeds above limits
- B. The total quantity of perchloroethylene (perc) purchased within the preceding 12 months by this dry cleaning facility was 58.1 gallons.

PART III: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC

(check only one box for each question)

Does the responsible official of the dry cleaning facility:

1. Store perc, and wastes containing perc, in tightly sealed & impervious containers? Yes No N/A
2. Examine the containers for leakage? ----- Yes No N/A
3. Close and secure machine doors except during loading/unloading? ----- Yes No
4. Drain cartridge filters in their housing or in sealed containers for at least 24 hours prior to disposal? ----- Yes No N/A
5. Maintain solvent-to-carbon ratios and steam pressure for carbon adsorber beds according to the manufacturer's specifications? ----- Yes No N/A

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC

(Refer to Part II-A.1.-4. Classification: page 1 of 4, this form)

1. If the facility classification is a **Existing small area source**, no controls are required. **Proceed to Part V.**
2. If the facility classification is a **New small area source**, the machine should be equipped with a refrigerated condenser. **Complete section A. below.**
3. If the facility classification is a **Existing large area source**, the machine should be equipped with either a refrigerated condenser or a carbon adsorber. **Complete both sections A and B below.** *Carbon adsorber must have been installed prior to September 22, 1993*
4. If the facility classification is a **New large area source**, the machine should be equipped with a refrigerated condenser. **Complete both sections A and B below.**

A. Has the responsible official of all existing large area & new sources:

(check only one box for each question)

1. Equipped all machines with the appropriate vent controls? ----- Yes No
2. Equipped dry-to-dry machines with a closed-loop vapor venting system? ----- Yes No N/A
3. Equipped the condenser with a diverter valve so airflow will be directed away from the condenser upon opening the door? ----- Yes No N/A
4. Measured and recorded the temperature of the outlet exhaust stream of a refrigerated condenser on a weekly basis? ----- Yes No see comment
5. Repaired or adjusted the equipment within 24 hours if the exhaust temperature of the condenser exceeded 45° F? ----- Yes No N/A
6. Conducted all temperature monitoring after an appropriate cool-down period and after verifying that the coolant had been completely charged? ----- Yes No

PART IV: PROCESS VENT CONTROLS – Rule 62-213.300 FAC (continued)

B. Does the responsible official of an existing large or new large area source also:

(check only one box for each question)

1. Measure and record the exhaust temperature on the outlet side of the condenser located on dry-to-dry, reclaimer, and dryer machines on a weekly basis? ----- Yes No
2. Measure and record the washer exhaust temperature at the condenser inlet and outlet weekly? ----- Yes No N/A
 - a) Is the temperature differential equal to, or greater than 20° F? ----- Yes No N/A
3. Measure and record the perc concentration in the exhaust stream weekly at the end of the final drying cycle while the machine is venting to the adsorber, if machines are equipped exclusively with a carbon adsorber? ----- Yes No N/A
 - a) Is the perc concentration equal to, or less than 100 ppm? ----- Yes No N/A
4. Assure that the sampling port on the carbon adsorber exhaust for measuring perc concentrations is at least 8 duct diameters downstream of any bend, contraction, or expansion; is at least 2 duct diameters upstream from any bend, contraction, or expansion; and downstream from no other inlet? ----- Yes No N/A
5. Equip transfer machines (dryers, reclaimers, and washers) with individual condenser coils? ----- Yes No N/A
6. Route airflow to the carbon adsorber (if used) at all times? ----- Yes No N/A

PART V: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC

(check only one box for each question)

Does the responsible official:

1. Maintain receipts for perc purchased? ----- Yes No
2. Maintain rolling monthly total of yearly perc consumption? ----- Yes No
3. Maintain leak detection inspection and repair reports for the following:
 - a) documentation of leaks repaired w/in 24 hrs? or; ----- Yes No N/A
 - b) documentation of parts ordered to repair leak and leak repaired w/in 2 days and parts installed w/in 5 days of receipt? ----- Yes No N/A
4. Maintain calibration data? (*for applicable direct reading instruments*) ----- Yes No N/A
5. Maintain exhaust duct monitoring data on perc concentrations? ----- Yes No N/A
6. Maintain a startup/shutdown/malfunction plan? ----- Yes No
7. Maintain deviation reports? ----- Yes No N/A
 - a) Problem corrected? ----- Yes No N/A
8. Maintain a compliance plan, if applicable? ----- Yes No N/A

PART VI: LEAK DETECTION AND REPAIRS – Rule 62-213.300 FAC

(check only one box for each question)

1. Does the responsible official conduct a weekly (for small sources, bi-weekly) leak detection and repair inspection? ----- Yes No
2. Does the facility maintain a leak log? ----- Yes No
3. Does the responsible official check the following areas for leaks?
- | | | | | | | | |
|--|---|-----------------------------|------------------------------|------------------------------|---|-----------------------------|---|
| a) Hose connections, fittings, couplings, and valves ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | g) Muck cookers ----- | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| b) Door gaskets and seating ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | h) Stills ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| c) Filter gaskets and seating----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | i) Exhaust dampers ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| d) Pumps ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | j) Diverter valves ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| e) Solvent tanks and containers-- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | k) Cartridge filter housings | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| f) Water separators ----- | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | | | | |

4. Which method(s) of detection (is/are) used by the responsible official?
- | | |
|---|--|
| a) Visual examination (condensed solvent on exterior surfaces) ----- | a) <input checked="" type="checkbox"/> |
| b) Physical detection (airflow felt through gaskets) ----- | b) <input checked="" type="checkbox"/> |
| c) Odor (noticeable perc odor) ----- | c) <input checked="" type="checkbox"/> |
| d) Use of direct-reading instrumentation (FID/PID/calorimetric tubes) ----- | d) <input type="checkbox"/> ** (see below) |
| e) Halogen leak detector ----- | e) <input checked="" type="checkbox"/> |

- **If using direct-reading instrumentation, is the equipment:** ----- ** N/A
- | | | |
|--|---------------------------------|-----------------------------|
| 1) Capable of detecting perc vapor concentrations in a range of 0-500 ppm? ----- | 1) <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2) Calibrated against a standard gas prior to and after each use (PID/FID only)? ----- | 2) <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3) Inspected for leaks and obvious signs of wear on a weekly basis? ----- | 3) <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4) Kept in a clean and secure area when not in use? ----- | 4) <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5) Verified for accuracy by use of duplicate samples (calorimetric only)? ----- | 5) <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Barbara Nevins

Inspector's Name (Please Print)

Barbara Nevins

Inspector's Signature

08/29/2007

Date of Inspection

08/29/2008

Approximate Date of Next Inspection

COMMENTS: This was a joint inspection for Air Resources and Hazardous Waste. Ed Russell, DEP Marathon, performed the Hazardous Waste inspection.

Section A. 4 Ms. Nielsen said that she measures the temperature of the outlet exhaust stream of the refrigerated condenser on a weekly basis. These measurements were not being recorded. Ms. Nielsen will begin keeping this record. All other record keeping requirements were satisfactory. This issue was rated as minor out of compliance since this was the only record keeping deficiency, the machine was relatively new, and Ms. Nielsen said she checks the temperature weekly, but wasn't recording the readings.

Return to compliance without formal enforcement is achieved by Ms. Nielson recording future readings at least every other week.

Part V 1. Documentation indicated that no leaks have occurred over the past year.

Part VI 1 Leak detection is required bi-weekly for this small source. Records revealed that the checks were being performed weekly

A new Aerotech ESP 2100 35 lb unit was installed in 2004. The current general permit for this facility is for this new unit. Machine specs are attached. The unit is serviced for preventative maintenance annually by Aerotech. This routine service call was scheduled for the same day as this inspection though the service tech had not yet arrived on site.

Photos taken during this inspection are attached to this report. Photos are for both Air and Hazardous Waste documentation.

The image shows a maintenance log and PERC purchase record for August 2007. The log includes a table for condenser temperature and a table for various machine components with columns for 'INSPECTED', 'LEAKING?', 'DATE', 'DATE PARTS ORDERED', 'DATE PARTS RECEIVED', and 'DATE REPAIRED'. A red stamp 'AUG 29 2007' is visible at the bottom right of the log.

Date	Temperature	Is Temp less than or equal to 48°F (12°C)?
8/29/07		Y/N
		Y/N
		Y/N
		Y/N

AUGUST 2007		
Total from last month		58.10
Subtract PERC purchased		0
AUGUST 2006		
SUBTOTAL		58.10
Purchase Date	Purchase Amount	12 Month Running Total
	0	58.10

INSPECTED	LEAKING?	DATE	DATE PARTS ORDERED	DATE PARTS RECEIVED	DATE REPAIRED
HOSES	(Y)	8/3			
DOOR	(Y)	8/14			
PUMP	(Y)	8/17			
SOLVENT TANK	(Y)	8/24			
WATER SEPARATOR	(Y)	8/31			
MUCK COOKER	(Y)				
STILL	(Y)				
EXHAUST DAMPER	(Y)				
DIVERTER VALVE	(Y)				
FILTER GASKET	(Y)				
CARTRIDGE FILTER	(Y)				
WASTE CONTAINERS	(Y)				

AUG 29 2007

THE BRIGHTEST STARS IN DRY CLEANING

ENVIRO-STARS

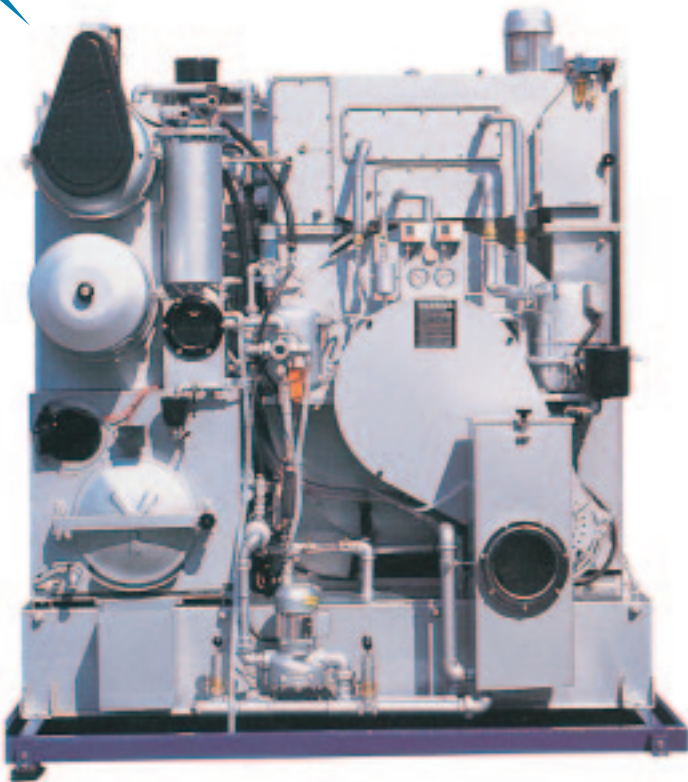
FROM **AERO-TECH**
USA INC.



THE ENVIRONMENTAL LEADER



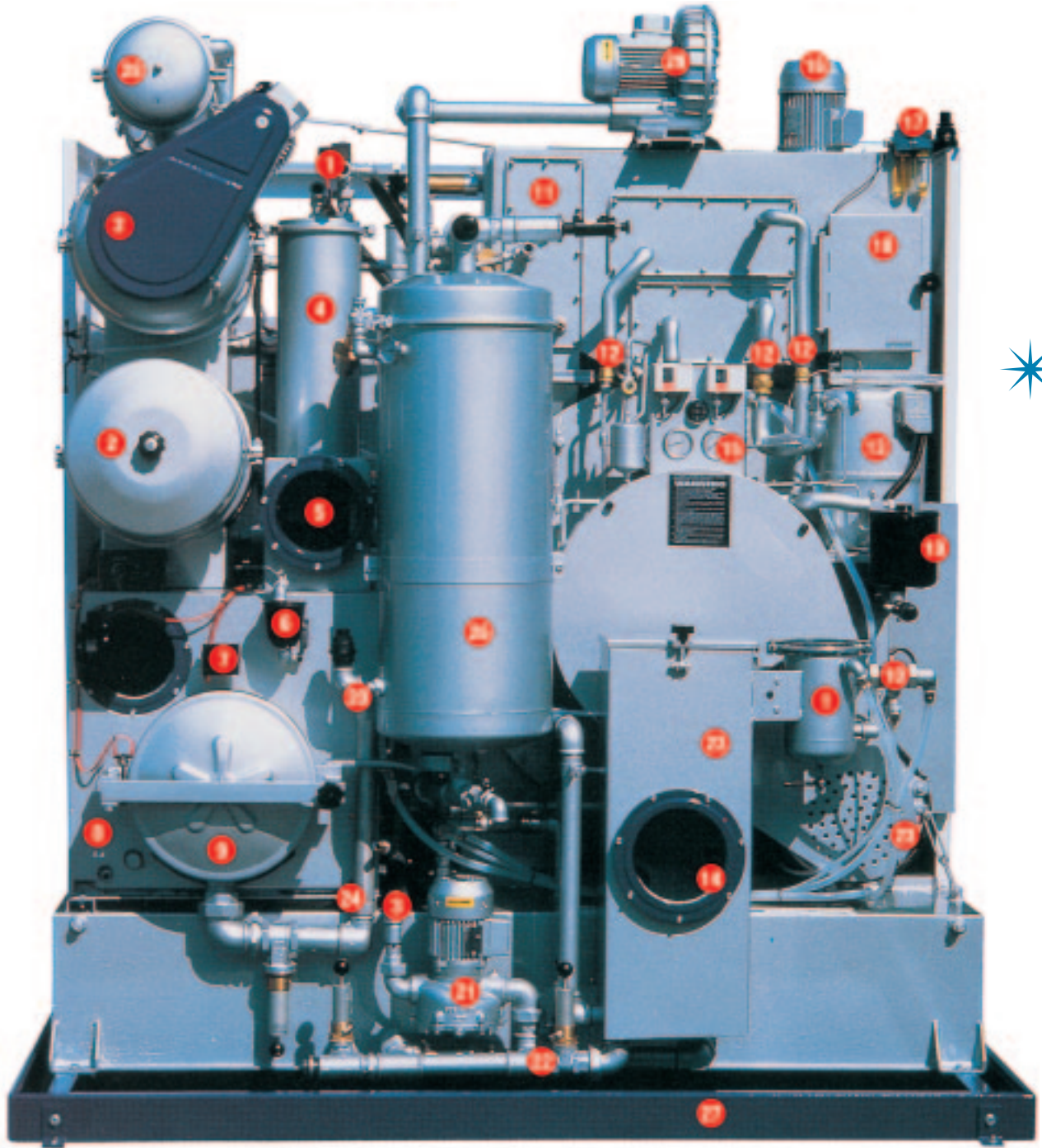
1. TWO SEPARATE WATER SEPARATORS
2. TWO CONVERTIBLE FILTERS
3. EXTRA-LARGE INLINE SOLVENT COOLER 40 & 50 LB. "ICE-TEMP" REFRIGERATED COOLER 60 & 80 LB.
4. EXTRA-LARGE STILL CONDENSER (2 ON 80 LB. MODEL)
5. STAINLESS STEEL WATER SEPARATOR, WITH SIGHT GLASS
6. STILL ADDITIVES CONTAINER
7. AUTOMATIC STILL CUTOFF
8. EXTRA-LARGE STAINLESS STEEL STILL
9. STILL DOOR LARGE ENOUGH FOR CARTRIDGES
10. AUTOMATIC DRY CONTROL (ON ALL MODELS)
11. ALL STAINLESS STEEL RECOVERY SECTION
12. SELF-SEAL REFRIGERATION UNIONS
13. "COPELAND", U.S.A. REFRIGERATION
14. SELF DRYING BUTTON TRAP WITH SIGHT GLASS
15. REFRIGERATION GAUGES
16. FAN MOTOR
17. AIR LINE FILTER/LUBRICATOR
18. DOUBLE-SCREEN LINT FILTER
19. AUTOMATED ADDITIVES CONTAINER
20. STILL STEAM SWEEP
21. EXTRA-LARGE SOLVENT PUMP
22. EXTRA-LARGE SOLVENT LINES
23. ALL STAINLESS STEEL BUTTON TRAP AND HOUSING
24. STILL SLUDGE PUMP
25. DRIVE MOTOR (2-SPEED EXTRACT ON 60/80-LB.)
26. "SUPER-SORB" C.V.A. SYSTEM
27. "SAFE GUARD" CONTAINMENT TANK
28. CARBON TOWER
29. SUPER-SORB FAN MOTOR
30. MONITORING GAUGES ON FRONT
31. LARGE, HEAVY-DUTY, LOADING DOOR
32. "LOGITROL" DUAL CONTROL PANEL
33. SELF-DIAGNOSTIC, TROUBLE SHOOTING PANEL



ENVIRO-STAR 2100



ENVIRO-STAR 2100 PLUS



5th GENERATION

FILTRATION SYSTEM

- * Virtually any filtration or distillation setup now or later
- * Two independent filter circuits for separation of light and dark cleaning
- * Cartridge filtration or spin disc filtration (Ecological discs with all carbon filter) or both
- * Easy conversion in the field to a different filter type
- * Large stills provide constant distillation with or without filtration
- * Transfer solvent directly from tank to tank
- * Control panel allows you to "polish" solvent over filter during drying, add dry time, drain filters and more
- * Selectable, automatic "perc-sensor" dry control
- * Two-speed extract on the 60/80 lb models

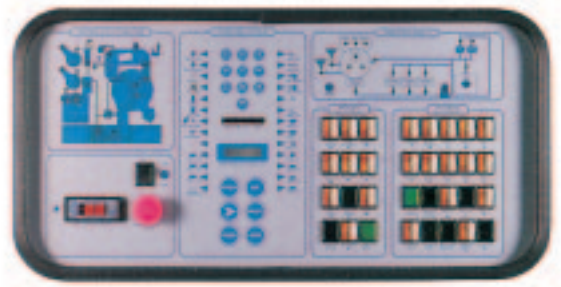
BUILT BETTER

- * Advanced recovery section design
- * Ultra-modern closed-circuit refrigeration
- * Reduced emissions meet and exceed EPA/OSHA regulations
- * Complete solvent vapor recovery
- * Extended perc mileage - up to 50,000 lbs. per drum!
- * Reduced vibration
- * Improved stability
- * Self-seal disconnects on the refrigeration lines
- * Immediate, easy access to the coils
- * Refrigeration gauges standard on all models
- * Freon R-22
- * Special thermostat prevents accidental freezing of the steam coil

BETTER CLEANING

- * Ice Temp™ Solvent Cooling System on 60 and 80 lb. machines.
You dial the solvent temperature you want.
- * 50% heavier than the competition
- * Massive construction at high-stress points
- * Low center of gravity reduces vibration
- * All stainless steel components - still, water separator, recovery section and button trap
- * Quiet operation
- * Long life
- * Less down time

- * The new Enviro-Star Plus exceeds all EPA and OSHA environmental codes.



LOGITROL™

Easiest to use control panel on the market. Every switch is labeled in English (no hard-to-decipher international symbols). Both air-flow and solvent-flow maps make it easy to run AERO-TECH manually and training time is reduced to a few minutes. Self-diagnostic panel makes trouble-shooting easy.



ANALOG GAUGE PANEL

All important gauges on front of machine for constant monitoring of operational temperatures and pressures.



AMERICAN DESIGNED REFRIGERATION SYSTEM

The world's best and most efficient system. Requires much less H.P. than European systems. Saves you up to 40% on electricity

CAPACITIES

35 lb 40 lb. 50 lb.
60 lb. 80 lb.



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1-305-758-8562 • 1-800-746-4583 • Fax 1-305-751-8390
www.drywetcleaning.com

AERO-TECH TECHNICAL SPECIFICATIONS PERCHLORETHYLENE MODELS, 3 TANKS		353	403	503	603	803	
MAXIMUM LOAD CAPACITY	LBS.	35	40	50	60	80	
CYLINDER:	Diameter	in.	32.8	36	38.5	40.8	46.8
	Depth	in.	20.5	20.5	21.5	23.8	23.8
	Volume.	cu.	10	12.1	14.5	18.0	23.7
	Wash Speed	ft.	40	37	35	34	33
	Extract Speed	RPM	400	370	360	165/360	165/360
CAPACITIES :	Tank 1	Gal	35	48	48	63	75
	Tank 2	Gal	35	48	48	63	75
	Tank 3	Gal	35	48	48	63	75
	Still - Maximum	Gal	43	71	71	110.4	126.6
	Still - (Useable)	Gal	36	55	55	92.8	106.6
FILTRATION:	Number of Circuits		2	2	2	2	2
	Convertible Cartridge Splits		4	6	6	6	8
	Large Cartridge Filter		2	2 or 1	1	1	1
	Spin Disc (Powderless/Powder)			1	1	1	1
	Carbon Tower (Std. Cartridge)			1	1	1	1
DISTILLATION RATE:	Gal./Hr. Steam		60	60	60	95	116
	Electric						
MOTORS:	Wash.	HP	.65	.8	1.0	1.5	2.0
	Extract	HP	2.0	3.0	4.0	4.5	5.5
	(2 speed 603 & 803)	HP				6.0	7.0
	Pump	HP	.75	1.0	1.0	1.5	1.5
	Fan	HP	1.5	1.5	2.0	2.0	3.0
	Exhaust	HP	0.1	0.1	0.1	0.1	0.1
	Refrigeration	HP	2.5	3.0	3.0	3.0	3.5
	Spin Filter	HP		.75	.75	1.0	1.0
	Super Sorb Fan/ESP Models	HP	1.0	1.0	1.0	1.0	1.0
UTILITIES:	Electric, 208-240/60/3						
	Steam Model: Circuit Breaker	AMP	40	40	50	60	75
	Steam Consumption:						
	Dry Cycle	HP	.5	.6	.65	.65	.77
	Still	HP	1.5	1.9	1.9	2.3	2.6
	Total	HP	2.0	2.5	2.55	3.0	3.4
DIMENSIONS:	Width	in.	69	79	79	83	91
	Depth Assembled	in.	59	59	61	68	78
	Depth "Stripped"	in.	50	52	52	59	68
	Height Assembled	in.	82	82	85	82	82
	Height "Stripped"	in.	81	82	85	82	82
WEIGHTS:	Empty	lbs	3215	3675	3995	4790	5780
	Full	lbs	5145	6105	6425	7828	9466
	Shipping	lbs	3390	3925	4270	5090	6130

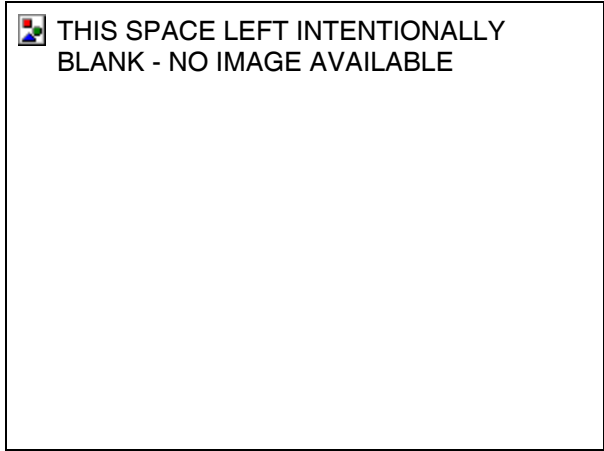
Note: Add 3 ½ " for Containment Tank - Add 3" on overall height for Absorber option.

All specifications subject to change without notice.

Keys Cleaners
Photos by Barbara Nevins and Ed Russell
on 8-29-07

I certify that these photos represent the true
on-site conditions observed
and have not been altered in any way.

Barbara Nevins



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Waste filters stored in closed drums, not
within a containment structure



80

Keys Cleaners
Photos by Barbara Nevins and Ed Russell
on 8-29-07

I certify that these photos represent the true
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Barbara Nevins



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84



85



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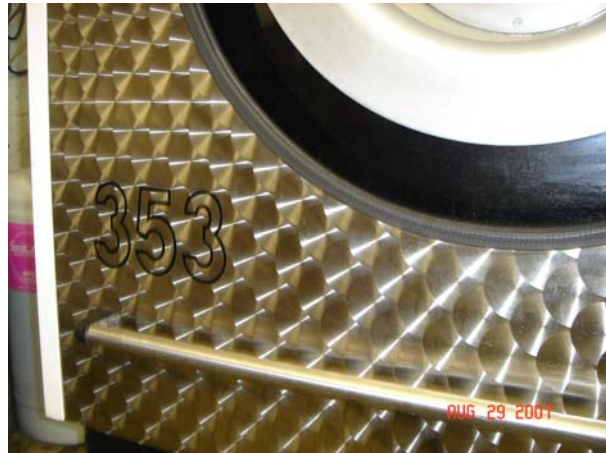
87



88



89



90



91



92

Ms. Neilsen demonstrates how she checks
around door seal with halogen meter

Keys Cleaners
 Photos by Barbara Nevins and Ed Russell
 on 8-29-07

I certify that these photos represent the true
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 and have not been altered in any way.

Barbara Nevins



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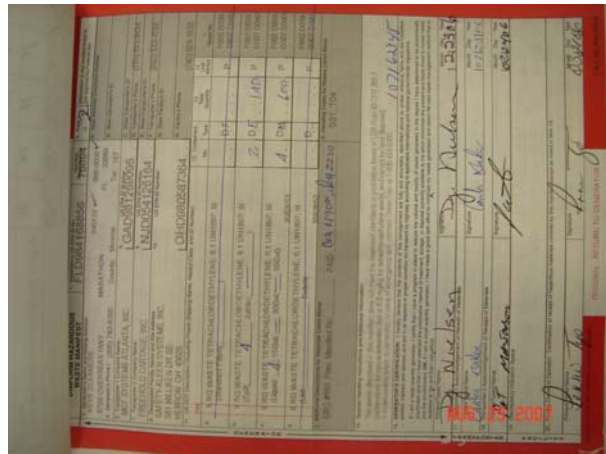


94

aerosol mist to outdoors

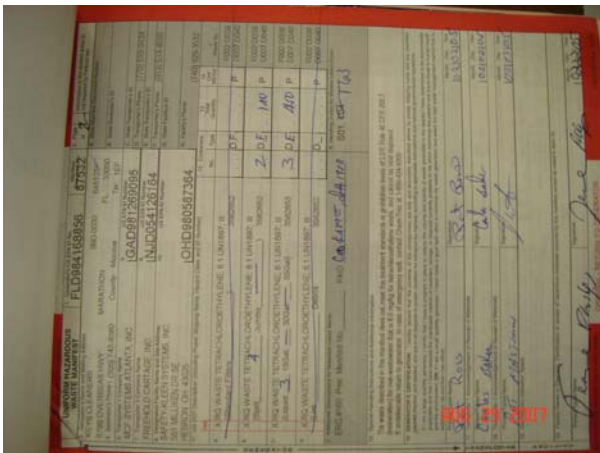


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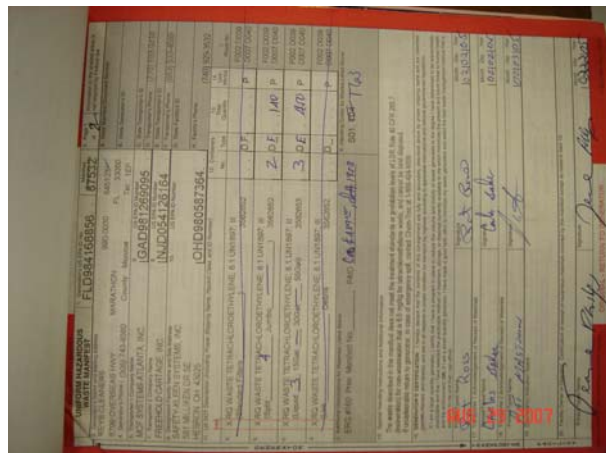


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photos 96-98 are waste manifests



97



98

Keys Cleaners
Photos by Barbara Nevins and Ed Russell
on 8-29-07

I certify that these photos represent the true
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and have not been altered in any way.

Barbara Nevins



99

waste perc stored in closed containers
on containment structure
drum with pink label is detergent



100