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Category: 15 – Solvent Metal Degreasing

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF AIR QUALITY PLANNING AND STANDARDS
RESEARCH TRIANGLE PARK, NORTH CAROLINA 27711

SUBJECT: Clarification of Degreasing Regulation Requirements

DATE: September 7, 1978

FROM: Richard G. Rhoads, Director
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TO: Director, Air and Hazardous Materials Division, Regions I, III-X
Director, Environmental Programs Division, Region II

It has come to my attention that the existing guidance in the control technology guideline (CTG) for solvent metal cleaning operations was not sufficiently explicit. The following questions and answers should clarify any remaining ambiguity in this area.

For urban nonattainment areas (>200,000 population), what are the appropriate exemptions for solvent metal cleaning operations?

The only exemptions which would generally be allowed are those explicitly provided for in the preface of the CTG. Namely, conveyORIZED degreasers smaller than 2.0 m-(squared) (21.5 ft-(squared)) of air/vapor interface should be exempted from the requirement for a major control device and open top vapor degreasers smaller than 1 m-(squared) (10.8 ft-(squared)) of open area should be exempt from the application of refrigerated chillers (or carbon adsorbers). Across the board exemptions for small sources (e.g., 3 lb/day) should not be approved. Because of the large number of small metal cleaning operations in existence, an exemption of this nature would significantly reduce the overall effectiveness of the controls program in this CTG category. We recognize that for cold cleaners (batch operated, non-boiling solvent degreasers typically of the type found in automotive repair facilities) these limits will be difficult to enforce. However, since the sources are so ubiquitous, we feel it would be preferable to set requirements which are applicable to similar pieces of equipment throughout the industry and prioritize enforcement rather than exempt particular sectors because of the difficulty with enforcement.

For rural nonattainment areas, what are appropriate exemptions for solvent metal cleaning regulations?

Besides those exemptions listed above for urban areas, the policy allows exemptions for sources less than 100 tons/year. Hence, an exemption for all cold cleaners in rural nonattainment areas would be approvable since a typical cold cleaner emits approximately 0.3 tons/year. However, States should not

exempt all open top vapor degreasers or conveyORIZED degreasers which individually emit less than 100 tons/year in rural nonattainment areas because large scale users may have over 100 separate degreasing operations at one plant location. If a State chooses to exempt open top or conveyORIZED degreasing operations in rural nonattainment areas, the limitation should be 100 tons or less on a facility-wide basis based on annual solvent purchase records. Further, any exemption which distinguishes between open top vapor degreasers and conveyORIZED degreasers should not be approved because of the potential of switching between equipment types. Although conveyORIZED degreasers are larger emitters, they emit significantly less solvent than do open top vapor degreasers for an equivalent work load. Thus, it would not be advantageous to encourage degreaser operators to choose open top vapor degreasers in order to avoid regulations on conveyORIZED degreasers.

The CTG for solvent metal cleaning identifies a Control System A and a Control System B. Under what circumstances are each appropriate?

States should be encouraged to control all sources to Control System B. level.

All urban nonattainment areas seeking an extension, and all facilities emitting in excess of 100 tons/yr in a nonattainment area, must apply Control System B.

cc: Chief, Air Branch, Regions I-X
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