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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

DATE: JUL 2 1980

SUBJECT: Exemption for Cold Cleaner Degreasers

FROM: Richard G. Rhoads, Director
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TO: Director, Air and Hazardous Materials Division, Regions I-X

During the past several months, a number of States have submitted VOC regulations for solvent metal cleaners that include an exemption based on weight, i.e., 3 lbs/hr, 15 lbs/day, for cold cleaners (batch operated, nonboiling solvent degreasers typically found in automotive repair facilities). A major concern of the States was related to the manpower requirements associated with enforcing regulations for these sources.

Agency policy guidance in these instances has been to conditionally approve regulations containing weight type exemptions applicable to urban nonattainment areas that cannot demonstrate attainment by 1982 pending State deletion of the exemption or demonstration of compliance with the five percent significance test. (See memoranda from Richard G. Rhoads, Director, CPDD to Director, Air and Hazardous Materials Division, Regions I-X, dated September 7, 1978 and December 12, 1979.)

The purpose of this memorandum is to provide additional guidance by specifying instances where certain designs of cold cleaner degreasers could justifiably be determined to be in compliance with the CTG.

In the development of NSPS for solvent metal cleaning, it was determined as the result of investigation that cold cleaners with remote solvent reservoirs expose solvent only while parts are being cleaned. The solvent is pumped through a nozzle suspended over a sink-like work area which drains back into the reservoir. Because the reservoir is remote from the work area, this type of cold cleaner is not subject to the evaporation losses suffered by conventional cold cleaners.

Consequently, it was concluded that cold cleaners with remote solvent reservoirs can be exempted from the operating requirements to cover the degreaser during non-use periods. In addition, the units can be exempted from equipment specifications which require each cold cleaner to have a closable cover and, because the sink collects solvent drainage, a separate drain rack is unnecessary.

In view of the above, State regulations which specify an exemption for cold cleaners meeting the following criteria could be approved as being equivalent to RACT.

- a. The cold cleaner must have a remote solvent reservoir.
- b. The solvent used in the cold cleaner must not have a vapor pressure that exceeds 4.3 kPa (33mm Hg or 0.6 PSI) measured at 38 degrees Celsius (100 degrees F) or be heated above 50 degrees Celsius (120 degrees F).
- c. The sink-life work area must have an open drain area less than 100 cm (squared).
- d. Evidence is provided that waste solvent will be stored or properly disposed of with minimal loss due to evaporation.

Should you have any questions regarding this memorandum, please contact Bill Polglase at (FTS 629-5251).