

QUESTIONS AND ANSWERS ON THE HALOGENATED SOLVENT CLEANER NESHAP

DEFINITION QUESTIONS

1. **Q - Is an “in-line” machine the same as a “conveyorized” machine?** An in-line machine is a conveyorized machine that does not stop during the cleaning process. If a conveyor is used to supply parts to a solvent cleaning machine and the conveyor stops during the process, it is a batch machine instead of an in-line machine.
2. **Q - What machines would not have a solvent/air interface?** Some newer batch vapor degreasers are completely enclosed and use a vacuum to create a solvent vapor during the cleaning cycle. The only option of compliance for these machines is the overall emission limit. The overall emission limit is calculated using the cleaning capacity.
3. **Q - Why is 1993 used as a cutoff date between “existing” and “new” sources.** EPA first proposed the NESHAP in 1993.
4. **Q - If an “existing” machine is moved within the plant, or sold, would it’s status change to a “new” machine?** No - It would have to meet the definition of reconstruction which deals with spending more than 50%, in capital, of the machine’s worth.

APPLICABILITY QUESTIONS

1. **Q - If I only use 5 gallons of solvent a month, in my solvent cleaning machine, am I still subject to the NESHAP?** If you are using a solvent containing at least 5% of any of the regulated solvents, or a combination of them, you are subject to the NESHAP regardless of how much you use.
2. **Q - Is there a minimum amount of usage that would be exempt from the NESHAP.** No, but users of buckets, pails or beakers less than 2 gallons in size are exempt from the NESHAP. This was promulgated in the Federal Register on 6-5-95.
3. **Q - If a facility is planning on permanently disconnecting their solvent cleaner by 1997, are they still required to submit an initial notification report?** Yes, but they should include information pertaining to the date that it will be disconnected. When the solvent cleaner is permanently disconnected they should send documentation to the AQD verifying this information.
4. **Q - If a facility uses a NESHAP subject solvent in a process that doesn’t use a halogenated solvent cleaner would it be subject to the NESHAP? For example, using Methylene Chloride to purge liquid foam lines.** No - You must use a

halogenated solvent cleaner (batch cold, batch vapor, in-line cold, in-line vapor) to be subject to the NESHAP. If you use such a cleaner you must also use (at least 5% by weight) of a subject solvent specified in the NESHAP.

5. **Q - A facility chooses to comply by choosing a control combination option that does not include utilizing a carbon adsorber, but the machine has a carbon adsorber. Does the facility have to perform the weekly monitoring required for a control combination option that includes a carbon adsorber?** No - The carbon adsorber would be considered an extra control. As long as another control combination option is chosen (that doesn't include a carbon adsorber), the monitoring required by another control combination (that includes a carbon adsorber) would not be required.
6. **Q - If a facility discontinues use of a subject machine but does not remove it will they still be subject to the NESHAP?** No, but the facility must be certain that they will not use the machine (with subject solvents) in the future. If they start the machine up again, using subject solvents, they will be in violation of the NESHAP.

ENFORCEMENT QUESTIONS

1. **Q - When a company submits an exceedance report, will DNR proceed enforcement actions?** The exceedance reports are intended to provide information to determine if the NESHAP requirements are doing what they were proposed to do. If the exceedance is ongoing or major, enforcement actions may be taken as necessary.
2. **Q - What are the ramifications if an operator does not pass the operator test that is given by an inspector.** Each state can determine what action will be taken in such a case. Enforcement action will be determined on a case-by-case basis in Michigan.
3. **Q - What are the consequences of not submitting the initial notification report on time or at all?** The facility will be in violation of the NESHAP. Each state can determine the action that will be taken in such a case. Enforcement action will be determined on a case-by-case basis in Michigan.
4. **Q - If a facility is planning to permanently disconnect a NESHAP subject machine, when does this have to be completed?** By the date that the compliance report is to be submitted. They must submit an initial notification report if the machine is not taken off line before the report is required. When the machine is permanently disconnected a letter should be sent into the AQD verifying this information.

WHERE TO FIND INFORMATION QUESTIONS

1. **Q - Where can a facility find information for calculating the idling emission rate?** There is guidance (Method 307) and apparatus in the NESHAP and EPA Guidance Document.

2. **Q - Where can a facility find information for calculating the overall emission rate of a solvent cleaner?** There is guidance (Method 307) and apparatus in the EPA Guidance Document.
3. **Q - Where can a facility find information for reducing the room draft?** In the EPA Guidance Document.

TECHNICAL QUESTIONS

1. **Q - How do you measure the temperature of the vapor zone?** Attach a thermometer or thermocouple to the hoist hook or parts basket then introduce it into the center of the vapor zone.
2. **Q - Where should the cover on the machine be located if there is a lip exhaust on the machine?** The cover must be below the lip exhaust to capture any vapors that may escape past the cover. A second cover may be installed over the entire unit.
3. **Q - Where should you measure the surface area of the solvent/air interface?** The measurement is taken where parts are inserted and does include where the vapors are returned to the tank.
4. **Q - How did EPA compute the idling and overall emission rates? Can these values be met? (the Emission Rates found in the AP-42)** EPA contracted manufacturers to do testing on cleaners with different controls. These emission tests were combined (averaged) to produce the numbers stated in the NESHAP. Manufacturers are in agreement that these emissions rates can be met by existing machines with existing controls.
5. **Q - How does a facility determine the amount of solvent in the tank sludge?** Method 25d, or engineering calculations.
6. **Q - The overall emission limit compliance option requires a monthly mass balance equation. How should a facility determine this if they do not change the solvent each month?** Calculate the amount of solvent added to fill the tank to a fill line each month.
7. **Q - How does a facility measure the freeboard of a machine?** From the solvent/air interface (middle of condensing coils, on average) to the top of the machine walls.

NESHAP MISCELLANEOUS QUESTIONS

- 1. Q - If a company must comply by March of 1998, when should the annual compliance reports be submitted?** The first report should be submitted by February 1999 and should contain information pertaining to March through December of 1998. Subsequent reports are to be submitted each February and should contain information pertaining to the previous year.
- 2. Q - Can a facility change their compliance approach before they are required to come into compliance if they already provided their compliance approach on their initial notification report?** Yes.
- 3. Q - Is there a requirement to clean the machine sump every month.** No, but it is a good idea to clean the sump monthly when calculating the mass balance. If the sump sludge is not accounted for the facility may calculate more emissions from the machine than there actually is.
- 4. Q - If a facility is publicly owned, how should the owner/operator section on the initial notification report to be completed?** The NESHPAP specifically requires that the facility document the owner/operator on the report. If the facility is publicly owned the operator, environmental manager or person responsible for the machine should be reported.
- 5. Q - If a facility has more than one machine that is subject or not subject to the NESHPAP can the facility submit one initial notification report for more than one machine?** If the machines are subject to the NESHPAP a separate initial notification report is required for each machine. If the machines are not subject to the NESHPAP we recommend that a separate initial notification report be submitted for each machine. If filling out a separate report for each machine is not feasible, IDENTICAL machines could be grouped onto a single report. A cover letter, with the number of identical units on each report, should be provided to explain the information.
- 6. Q - Is an automated parts handling system mandatory for a NESHPAP subject machine?** Yes - Unless the machine is a batch vapor, in-line vapor, or in-line cold cleaning machine that chooses the overall emission limit to comply, or is a batch cold cleaning machine.
- 7. Q - Is an automated parts handling system required to be automated both vertically and horizontally? For example; parts are placed in the parts basket, the basket is then MANUALLY moved HORIZONTALLY over the machine, the basket is then MECHANICALLY lowered VERTICALLY into, and out of, the machine, the basket is then MANUALLY moved HORIZONTALLY, and the parts are removed.** Although the definition of "automated parts handling system" requires an automated system from initial loading of parts to the removal of parts, an automated parts handling system that is automated only vertical may be in compliance on the NESHPAP. The facility must demonstrate that the vertical speed is less than 11 ft/min. and that the manual horizontal moving does not upset the vapor

zone. Note that this is only acceptable for a batch vapor machine. In-line machines must still have an automated parts handling system (vertically and horizontally). A batch cold machine does not specifically require an automated parts handling system.

8. **Q - Is the exemption of buckets or pails (Federal Register, June 5, 1995) less than 2 gallons going to be raised to 5 gallons? No**
9. **Q - What is the future of the NSPS for non halogenated solvent cleaners, proposed in September 1994?** In 1979 Control Technology Guidelines were set for halogenated and non halogenated solvent cleaners. (which Michigan adopted and led to Rules 611 - 614 and 707 - 710). The NESHAP was promulgated in Dec. 1994 to regulate halogenated solvent cleaners. In 1981 EPA proposed an NSPS that was very similar to the CTG set in 1979. Nothing was done with regard to the NSPS until 1994 when it was re-proposed. Essentially if states adopted the CTG in 1979 sources in compliance with the CTG will be in compliance with the proposed NSPS. The NSPS will more than likely be withdrawn due to this fact.

STATE RULES/PERMIT QUESTIONS

1. **Q - Does rule 285 (o) (iv) apply to vapor degreasers and cold cleaners if emissions are only released to the in-plant environment? Was Rule 285 (o) intended for vapor degreasers and cold cleaners?** Rule 285 (o) (iv) states: The permit system does not apply to equipment used for the metal treatment process cleaning, if the process emissions are only released into the general in-plant environment. Rule 285 (o) (iv) was not specifically written to exempt degreasers and cold cleaners. Questions arose at a later date as to the applicability of the exemption with degreasers and cold cleaners and it was determined that such machines that emit only to the general in-plant environment would fall under this exemption. If the cleaner is vented to the atmosphere, they do not fall under this exemption. Remember that if a cleaner falls under the exemptions they still must comply with 600 - 700 Rules and/or the NESHAP for halogenated solvent cleaners. A Profs note from Jerry Avery on 10-20-92 explains the Divisions stance on this issue.
2. **Q - Do you need a permit or permit revision to change solvents?** If you do not currently have a permit, you are required to do so by Rule 201 unless you are exempt by Rule 281 (h), 285 (i) (iii), 285 (o) (iv) or 290. If you currently have a permit, you do not need a revision if the change complies with Rule 285 (b) or (c) (iii). Generally a revision is not needed if the new solvent is less hazardous, less volatile, has less than a 10% increase in emissions or is less than a 4 ton/year increase in emissions.