

**Air Pollution Control Board**

Greg Cox	District 1
Dianne Jacob	District 2
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Ron Roberts	District 4
Bill Horn	District 5

Air Pollution Control District

R. J. Sommerville	Director
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NOTICE OF WORKSHOP

TO DISCUSS IMPLEMENTATION OF THE NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP)

SUBPART T - NATIONAL EMISSION STANDARDS FOR HALOGENATED SOLVENT CLEANING

The San Diego County Air Pollution Control District will hold a public meeting to discuss implementation of the U.S. Environmental Protection Agency (EPA) National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart T - National Emission Standards for Halogenated Solvent Cleaning. The purpose of this workshop is to provide information about federal requirements for facilities using halogenated solvents for cleaning and degreasing operations, and to respond to questions and comments. Comments concerning the implementation of this NESHAP - Subpart T may also be submitted in writing before or at the workshop which is scheduled as follows:

DATE: October 16, 1997 - Thursday
TIME: 9:00 a.m.
PLACE: Air Pollution Control District
Conference Room 139
9150 Chesapeake Drive
San Diego

On December 2, 1994, the EPA adopted the NESHAP Subpart T - National Emission Standards for Halogenated Solvent Cleaning (59 FR 61805 / 12/4/94). Subpart T applies to all cold solvent and vapor cleaning machines (degreasers) with a capacity of two gallons or more that are using halogenated solvents identified as Hazardous Air Pollutants (HAPs). These include methylene chloride (dichloromethane), perchloroethylene (perc), trichloroethylene (TCE), 1,1,1-trichloroethane (TCA), carbon tetrachloride, and chloroform.

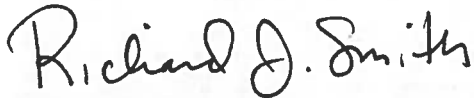
Owners or operators of cleaning machines which were in operation on or before November 23, 1993 must comply with Subpart T requirements by December 2, 1997. Owners or operators of cleaning machines which started operations after November 23, 1993 must be in compliance with Subpart T requirements at the time of startup.

Subpart T contains emission and equipment standards, and monitoring, reporting and record-keeping requirements for both cold solvent and vapor degreasers. Because Subpart T is very complicated, the District has prepared two summaries clarifying its requirements - one for cold solvent degreasers and another for vapor degreasers. For facilities known to the District to have halogenated solvent degreasing operations subject to Subpart T, the applicable summary has been enclosed with this workshop notice.

8/28/97 9150 Chesapeake Drive • San Diego • California 92123-1096 • (619) 694-3307
FAX (619) 694-2730 • Smoking Vehicle Hotline 1-800-28-SMOKE

The full text of NESHAP Subpart T - National Emission Standards for Halogenated Solvent Cleaning (59 FR 61805 / 12/4/94) is included in the Appendices (Appendix B) to the District's Rules and Regulations. Copies are available on request. The District will implement and enforce Subpart T without formally adopting a specific rule, as allowed by state law and in accordance with procedures approved by the Air Pollution Control Board.

If you would like a copy of Subpart T or one or both summaries for cold solvent and/or vapor degreasers, please call Juanita Ogata at (619) 694-8851. If you have any questions about this federal regulation or compliance requirements, please call Debbie Ryan at (619) 694-3838, Natalie Zlotin at (619) 694-3312, or me at (619) 694-3303.

A handwritten signature in black ink that reads "Richard J. Smith". The signature is written in a cursive, flowing style.

RICHARD J. SMITH
Deputy Director

RJSm:NZ:DR:jo
8/28/97

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**SUMMARY OF NESHAP SUBPART T FOR
SOLVENT CLEANING OPERATIONS
USING HAZARDOUS AIR POLLUTANTS (HAPS)**

COLD SOLVENT DEGREASERS

WILL THIS NEW REGULATION APPLY TO MY OPERATION?

National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart T - National Emission Standards for Halogenated Solvent Cleaning applies to all solvent cleaning machines (cold and vapor degreasers) with a capacity of two gallons or more, and using any of the following halogenated HAP solvents or combination of solvents, even if they are not currently permitted by the District:

Halogenated HAP Solvents

Chemical Abstract No.

- | | |
|---|----------|
| • methylene chloride (dichloromethane) | 75-09-2 |
| • carbon tetrachloride | 56-23-5 |
| • trichloroethylene | 79-01-6 |
| • perchloroethylene (tetrachloroethylene, perc) | 127-18-4 |
| • 1,1,1-trichloroethane (methyl chloroform, tric, TCA) | 71-55-6 |
| • chloroform | 67-66-3 |
| • any combination of these halogenated solvents, if their concentration in a cleaning material is greater than five percent (wt.) | |

The District will implement this NESHAP locally. This summary has been prepared by the District to describe U.S. Environmental Protection Agency (EPA) NESHAP Subpart T requirements for vapor degreasers. If you would like the summary of Subpart T requirements for cold degreasers or a copy of Subpart T, please contact Juanita Ogata at (619) 694-8851.

ARE THERE ANY EXEMPTIONS?

Yes, Subpart T exempts degreasers that either: (1) have a capacity less than two gallons, or (2) use cleaning solvents containing five percent (wt.) or less of any one, or any combination, of the above listed HAP solvents.

MUST I DOCUMENT MY EXEMPTION?

Yes, you need to maintain records demonstrating the solvent(s) or solvent blends used in your degreaser contain five percent (wt.) or less of any one or combination of the listed solvents. This can usually be done using the Material Safety Data Sheet (MSDS). If you mix your own solvent blend, you need to show through calculations that the concentration of listed solvents in the blend is five percent (wt.) or less. This is required to demonstrate that the regulation does not apply to you. Records need to be kept onsite for five years or until operations are no longer subject to the requirements of Subpart T, and records must be sufficiently detailed to allow the District to verify the exemption.

Halogenated Solvent Content Recordkeeping Forms may be obtained from the District's Compliance Division to assist in making this determination.

WHAT ARE THE REQUIREMENTS?

Subpart T applies to both immersion and remote reservoir cold degreasers. It allows a choice of compliance strategies, including emission control options, and depending on the option selected, the implementation of work practices may be required. Subpart T also requires the submittal of an Initial Notification and a Compliance Report.

The following requirements apply to cold solvent degreasers. These are described in detail in the federal regulation.

a) Initial Notification Report for Cold Solvent Degreasers

A description of the Initial Notification Report and specific notification forms applicable to cold degreasers are contained in the *District Advisory for Federal Reporting Requirements for Halogenated Solvent Cleaning Machines*. If you need a copy of this Advisory, please contact Juanita Ogata at (619) 694-8851.

The Advisory was sent to all affected sources in August 1995. Facilities with degreasers in operation at that time were required to submit the Initial Notification Reports to the District by September 29, 1995. Facilities which have not submitted an Initial Notification Report, must complete and submit this Report to the District as soon as possible. For new degreasers, the Initial Notification Report must be submitted before equipment startup.

The Initial Notification Report must include the following:

- Name and address of the solvent degreaser owner or operator
- The location of the solvent degreaser
- A brief description of each machine and existing controls
- Date of installation, or a letter certifying that the degreaser and its control devices were installed prior to, or after November 29, 1993
- The planned or intended compliance option for each machine
- An estimate of annual halogenated HAP solvent consumption for each machine.

b) Emission Control Options

Owners or operators of equipment subject to Subpart T must comply with one of the listed emission control options identified by machine type:

Immersion Cold Solvent Degreasers:

- Installation of a cover and a 2.5 cm (1 inch) water layer; or
- Installation of a cover and a 0.75 freeboard ratio or greater, and implementation of work practices.

Remote Reservoir Cold Solvent Degreasers

- Installation of a cover and implementation of work practices. To comply with the work practice requirements an owner or operator of a remote reservoir cold solvent degreaser must:

c) **Work Practices**

To comply with the work practice requirements, an owner or operator of a remote reservoir cold solvent degreaser, or an immersion cold solvent degreaser electing to comply with the emission control option through use of a 0.75 freeboard ratio or greater, must:

1. Store solvent waste in closed containers.
2. Flush parts in freeboard area.
3. Reduce the pooling of solvent on and in parts.
4. Not fill degreaser above fill-line.
5. Clean spills immediately.
6. Store wipe rags in closed containers.
7. Not agitate solvent to the point of causing splashing.
8. Control room drafts when cover is open.
9. Not use the degreaser for cleaning absorbent materials.

This use of work practices is not a requirement for owners or operators of immersion cold solvent degreasers electing to comply with the emission control option using the 2.5 cm (1 inch) water layer.

d) **Compliance Report**

For machines with startup dates before November 29, 1993, the Compliance Report must be submitted **by May 1, 1998**. For each degreaser installed after November 29, 1993, the Compliance Report needs to be submitted as soon as possible, but not later than 150 days after startup.

For batch cold degreasers, the Compliance Report must contain the following:

- Name and address of the degreaser owner or operator
- The location of the degreaser
- A statement signed by the owner or operator, stating that the degreaser is in compliance with the provisions of Subpart T
- The compliance approach for each degreaser.

Compliance Report Forms may be obtained from the District's Compliance Division.

WHAT RECORDKEEPING FORMS ARE AVAILABLE?

The following recordkeeping forms have been prepared by EPA and may be obtained from the District's Compliance Division at (619) 694-3299 or 694-2638.

Recordkeeping to Determine Eligibility for Exemption

- Halogenated Solvent Content Recordkeeping Form (designed for use in determining HAP Solvent Content (wt. percent) of Solvent Blends) - 2 pages

Notifications and Reporting

- Initial Notification Report for Batch Cold Cleaners - 2 pages
- Compliance Report for Batch Cold Cleaners - 2 pages

HOW LONG AM I REQUIRED TO MAINTAIN RECORDS AT MY SITE?

All records related to compliance with Subpart T need to be kept for five years.

WHEN DO I NEED TO COMPLY WITH NESHAP REQUIREMENTS?

The compliance date for your facility depends on the startup date, which determines whether your equipment is classified as new or existing. Compliance dates are listed in Table I.

TABLE I
NESHAP Compliance Dates for Cold Degreasers

Requirement	Date of Degreaser Startup	Compliance Date
Initial Notification Report	After November 29, 1993	ASAP prior to startup
	On or prior to November 29, 1993	ASAP
Emission Control Options	After November 29, 1993	With equipment startup
	On or prior to November 29, 1993	December 2, 1992
Compliance Report	After November 29, 1993	150 days after startup
	On or prior to November 29, 1993	May 1, 1998

WHAT SHOULD I DO IF I PLAN TO DISCONTINUE USE OF A LISTED HAP SOLVENT OR EQUIPMENT SUBJECT TO THIS NESHAP?

Facilities that submitted an Initial Notification Report, but have subsequently stopped, or intend to stop using the equipment or halogenated solvents regulated by Subpart T, need to notify the District of the intended change and, again, to confirm that the changeover is complete. Notifications should be submitted to the District as soon as possible, but must be received before December 2, 1997 in order to remain in compliance with Subpart T. The District will transmit all notices to EPA.

IF MY EQUIPMENT IS IN A "NOT TO OPERATE" STATUS, AM I IN COMPLIANCE WITH SUBPART T?

No, the "Not to Operate" status (District Fee Schedule 49A) does not satisfy the requirements of Subpart T. A Permit to Operate a halogenated solvent degreaser needs to be retired or modified. Please contact Ron McInnes at (619) 694-3965 for additional information regarding permit modifications.

As an alternative, you may elect to comply with the requirements of Subpart T, which include, at a minimum, the Initial Notification and Compliance Report.

HOW DOES SUBPART T AFFECT COMPLIANCE WITH DISTRICT RULE 67.6 - SOLVENT CLEANING OPERATIONS?

Subpart T does not affect compliance with District Rule 67.6 - Solvent Cleaning Operations. In addition to Subpart T requirements, degreasers currently subject to District Rule 67.6 must comply with the rule and with their existing Permit to Operate conditions. Modifications to equipment, operating parameters, solvents, usage rates, or permit conditions may require an application and District approval prior to modification. Please contact Ron McInnes at (619) 694-3965 for additional information regarding permit modifications.

HOW WILL SUBPART T BE IMPLEMENTED?

Subpart T - National Emission Standards for Halogenated Solvent Cleaning is included in Appendix B in the Appendices to the District's Rules and Regulations. The District will implement and enforce the requirements of the NESHAP Subpart T locally without formally adopting a specific rule, as allowed by state law and in accordance with procedures approved by the Air Pollution Control Board.

The District will serve as the primary point of contact for facilities. Requests for and return of Initial Notification and Compliance Reports should be directed to:

San Diego Air Pollution Control District
9150 Chesapeake Drive
San Diego, CA 92123
Attn.: Debbie Ryan
Phone: (619) 694-3838

All completed and signed Notification and Compliance Reports will be verified by the District before forwarding to EPA on your behalf. Pursuant to federal regulations, failure to submit the required information could result in an enforcement action by EPA.

HOW CAN I OBTAIN A COPY OF THE ACTUAL REGULATION?

You may obtain a copy of the federal regulation, Subpart T - National Emission Standards for Halogenated Solvent Cleaning by:

- referring to Federal Register/Vol. 59, No. 231/p61805 December 12, 1994
- purchasing the District's Rules and Regulations, including appendices, by calling the District at (619) 694-8851,
- accessing EPA's Electronic Bulletin Board System at (919) 541-5742, or
- calling the regional EPA office at (415) 744-1182.

Summary of Subpart T (Cold Solvent Degreasers)

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I NEED HELP . . .

If you have any questions regarding Subpart T, please contact any of the following persons:

San Diego Air Pollution Control District

- Debbie Ryan for questions regarding Subpart T (619) 694-3838
- Ron McInnes for Permit Assistance (619) 694-3965
- Paul Davis, Small Business Liaison (619) 694-2288

EPA Region IX (San Francisco)

- Michael Stenburg (415) 744-1182

EPA Headquarters (North Carolina)

- Paul A. Almodovar (919) 541-0283
- EPA Technology Transfer Network - Assistance Line (919) 541-5384
- EPA Technology Transfer Network - Bulletin Board (919) 541-5742
- EPA Control Technology Center (919) 541-0800

For additional information, see the *District Advisory for Federal Reporting Requirements for Halogenated Solvent Cleaning Machines*. This Advisory was sent to all affected sources on September 26, 1995. If you need a copy of the Advisory, please contact Juanita Ogata at (619) 694-8851.

Other publications related to this regulation include:

- *New Regulation Controlling Air Emissions From Solvent Cleaning Machines (Degreasers)* (EPA-453/F-94-083), March 1995.
- *Guidance Document for the Halogenated Solvent Cleaner National Emission Standards for Hazardous Air Pollutants (NESHAP)* (EPA-454/R-94-081), April 1995.

These documents are available from the EPA Library at (919) 541-2777, EPA Control Technology Center at (919) 541-0800, or through the District.

For information on available solvent substitutes and vendors, please contact the Stratospheric Ozone Protection Hotline at (800) 296-1996. They can also provide manuals describing alternatives to cleaning with methyl chloroform and CFC-113 in:

- metals cleaning
- precision cleaning
- electronics cleaning
- aircraft maintenance cleaning
- no-clean processes for electronics assembly, and
- reduction in use of CFC-113 and methyl chloroform through conservation practices.

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**SUMMARY OF NESHAP SUBPART T FOR
SOLVENT CLEANING OPERATIONS
USING HAZARDOUS AIR POLLUTANTS (HAPS)
VAPOR DEGREASERS**

WILL THIS NEW REGULATION APPLY TO MY OPERATION?

National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart T - National Emission Standards for Halogenated Solvent Cleaning applies to all solvent cleaning machines (cold and vapor degreasers) with a capacity of two gallons or more, and using any of the following halogenated HAP solvents or combination of solvents, even if they are not currently permitted by the District:

<u>Halogenated HAP Solvents</u>	<u>Chemical Abstract No.</u>
• methylene chloride (dichloromethane)	75-09-2
• carbon tetrachloride	56-23-5
• trichloroethylene	79-01-6
• perchloroethylene (tetrachloroethylene, perc)	127-18-4
• 1,1,1-trichloroethane (methyl chloroform, tric, TCA)	71-55-6
• chloroform	67-66-3
• any combination of these halogenated solvents, if their concentration in a cleaning material is greater than five percent (wt.)	

The District will implement this NESHAP locally. This summary has been prepared by the District to describe U.S. Environmental Protection Agency (EPA) NESHAP Subpart T requirements for vapor degreasers. If you would like the summary of Subpart T requirements for cold degreasers or a copy of Subpart T, please contact Juanita Ogata at (619) 694-8851.

ARE THERE ANY EXEMPTIONS?

Yes, Subpart T exempts degreasers that either: (1) have a capacity less than two gallons, or (2) use cleaning solvents containing five percent (wt.) or less of any one, or any combination, of the above listed HAP solvents.

MUST I DOCUMENT MY EXEMPTION?

Yes, you need to maintain records demonstrating the solvent(s) or solvent blends used in your degreaser contain five percent (wt.) or less of any one or combination of the listed solvents. This can usually be done using the Material Safety Data Sheet (MSDS). If you mix your own solvent blend, you need to show through calculations that the concentration of listed solvents in the blend is five percent (wt.) or less. This is required to demonstrate that the regulation does not apply to you. Records need to be kept onsite for five years or until operations are no longer subject to the requirements of Subpart T, and records must be sufficiently detailed to allow the District to verify the exemption.

Halogenated Solvent Content Recordkeeping Forms may be obtained from the District's Compliance Division to assist in making this determination.

WHAT ARE THE REQUIREMENTS?

Subpart T applies to both batch vapor and in-line degreasers. It allows a choice of compliance strategies (either various control options or overall HAP emission limits) which are described in detail in the federal regulation. For most facilities, compliance with the overall HAP emission limit will be the most cost-effective and least burdensome option. Along with the selected compliance strategy, the facility will also have to comply with Subpart T monitoring, recordkeeping, notifications and reporting requirements. The summary of Subpart T requirements which follows has been detailed specifically for facilities electing to comply with the overall HAP emission limit.

a) Initial Notification Report

A description of the Initial Notification Report and specific notification forms applicable to vapor degreasers are contained in the *District Advisory for Federal Reporting Requirements for Halogenated Solvent Cleaning Machines*. If you need a copy of this Advisory, please contact Juanita Ogata at (619) 694-8851.

The Advisory was sent to all affected sources in August 1995. Facilities with degreasers in operation at that time were required to submit the Initial Notification Reports to the District by September 29, 1995. Facilities which have not submitted an Initial Notification Report, must complete and submit this Report to the District as soon as possible. For new degreasers, the Initial Notification Report must be submitted before equipment startup. It must include the following:

- Name and address of the degreaser owner or operator
- The location of the degreaser
- A brief description of each machine and existing controls
- Date of installation, or a letter certifying that the degreaser and its control devices were installed prior to, or after November 29, 1993
- The planned or intended compliance option for each machine
- An estimate of annual halogenated HAP solvent consumption for each machine

b) Overall HAP Emission Limit

The overall HAP emission limit is listed by machine type in Table 1.

TABLE I

Overall HAP Emission Limit for Batch Vapor and In-Line Degreasers

Machine Type	Average Monthly Overall HAP Emission Limit over a three-month rolling period	
	kg/m ²	lb/ft ²
Batch Vapor	150	30.7
In-Line (startup on or before November 29, 1993)	153	31.4
In-Line (startup after November 29, 1993)	99	20

c) **Initial Statement of Compliance**

For machines with startup dates before November 29, 1993, the Initial Statement of Compliance must be submitted **by May 1, 1998**. For each degreaser installed after November 29, 1993, the Initial Statement of Compliance needs to be submitted as soon as possible, but not later than 150 days after startup.

For facilities with batch vapor and in-line degreasers electing to comply with the overall HAP emission limit, the Initial Statement of Compliance must contain the following:

- Name and address of the degreaser owner or operator
- The location of the degreaser
- The solvent/air interface area for each degreaser
- The results of the first three-month average HAP emissions calculations as described in Section (d) below.

Initial Statement of Compliance Reporting Forms may be obtained from the District's Compliance Division.

d) **Monitoring and Recordkeeping**

Beginning on the Compliance Date (listed in Table II), facilities must maintain the following records in written or electronic form for a period of five years:

- Log including dates and amounts of solvent additions and deletions for each degreaser. A sample log may be obtained from the District's Compliance Division.
- Solvent weight composition of wastes removed from the machines.
- Calculation sheets showing how monthly HAP emissions and the rolling three-month average emissions from the degreaser were determined, and the results of all calculations.

To ensure that HAP emissions from each degreaser are equal to or less than the overall HAP emission limit, HAP emissions must be calculated on a monthly basis and evaluated as a three-month rolling average. Compliance with the overall HAP emission limit shall be determined on the first operating day of every month using the method detailed below and in Appendix A:

- Ensure that the degreaser system contains only clean liquid solvent (limited to fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils).
- Indicate a fill-line during the first month the measurements are made.
- Return the solvent level within the machine to the same fill-line each month, immediately prior to calculating monthly HAP emissions.
- Calculate monthly HAP emissions using the method detailed in Appendix A.
- Determine the monthly rolling average for the three-month period ending with the most recent reporting period using the methods provided in Appendix A (for machines with a solvent/air interface).

Recordkeeping Forms may be obtained from the District's Compliance Division.

TABLE II.
NESHAP Compliance Dates for Vapor Degreasers

Requirement	Date of Degreaser Startup or Applicability	Compliance Date
Submit Initial Notification Report	After November 29, 1993	ASAP prior to startup
	On or prior to November 29, 1993	ASAP
Operate Equipment to Ensure Compliance with Emission Limit	After November 29, 1993	With equipment startup
	On or prior to November 29, 1993	December 2, 1992
Refill Solvent to Fill-Line Perform Monitoring and Recordkeeping Calculate HAP Emissions	After November 29, 1993	1st operating date of each month beginning with equipment startup
	On or prior to November 29, 1993	1st operating date of each month beginning December 2, 1997
Submit Initial Statement of Compliance	After November 29, 1993	150 days after startup
	On or prior to November 29, 1993	May 1, 1998
Submit Annual Compliance (Emissions) Report	All sources	Following the Initial Statement of Compliance February 1st of each year
Submit Exceedance Report	If no exceedance has occurred	30th of the month following the end of the calendar half year
	If an exceedance has occurred	30th of the month following the end of the calendar quarter

e) Annual Compliance (Emissions) Reporting

Annual Compliance Reports for the previous year must be submitted to the District before February 1st of the following year. For compliance with the overall HAP emission limit, the Annual Compliance Report must include the following information:

- Degreaser type and size (solvent air/interface area or cleaning capacity) for each machine
- Average monthly solvent consumption in kilograms (pounds) per month for each machine
- The monthly three-month rolling average solvent emission estimates calculated each month for each machine.

f) Exceedance Report

An Exceedance Report states whether exceedances in monitored parameters have occurred, and what actions were taken to correct any exceedance. Exceedance Reports must be submitted semiannually for each degreaser whether or not an exceedance has occurred. More frequent reporting may be required when the District determines on a case-by-case basis that more frequent reporting is necessary, or if an exceedance occurs. Requirements of Exceedance Reports differ depending on whether or not an exceedance has occurred.

- **If No Exceedance Has Occurred**

If no exceedance of a monitored parameter has occurred, the report would be a statement certifying that there were no exceedances. If a piece of equipment has been inoperative, repaired, or adjusted, such information must be stated in the report. Exceedance Reports for compliant facilities must be delivered or postmarked by the 30th day following the end of each calendar half year.

- **If an Exceedance Has Occurred**

If an exceedance has occurred, include the reason for the exceedance and the actions taken. Once an exceedance has occurred, the owner or operator must follow a quarterly reporting format until certain conditions of compliance are maintained and the District agrees to a less frequent reporting schedule. For facilities on a quarterly reporting schedule, the exceedance report shall be delivered or postmarked by the 30th day following the end of each calendar quarter.

Exceedance Reporting Forms may be obtained from the District's Compliance Division.

WHAT ARE THE REQUIREMENTS FOR OTHER COMPLIANCE OPTIONS?

There are separate and lengthy requirements detailed in Subpart T for:

- Facilities with Batch Vapor or In-line Degreasers without a Solvent/Air Interface electing to comply with the Overall HAP Emission Limit
- Facilities with Batch Vapor or In-line Degreasers electing to comply with the Equipment Requirements and Work Practices identified in Subpart T rather than the Overall HAP Emission Limit

The District will work individually with facilities which elect either of these compliance options.

WHAT RECORDKEEPING FORMS ARE AVAILABLE?

The following recordkeeping forms have been prepared by EPA and may be obtained from the District's Compliance Division at (619) 694-3299 or 694-2638.

Recordkeeping to Determine Eligibility for Exemption

- Halogenated Solvent Content Recordkeeping Form (designed for use in determining HAP Solvent Content (wt. percent) of Solvent Blends) - 2 pages

Recordkeeping to Determine Compliance with the Overall HAP Emission Limit

- Cleaning Capacity Determination Recordkeeping Form - single page
- Monthly Emissions Recordkeeping Form Compliance Demonstration - single page
- Overall Emissions Limit Recordkeeping Form - single page
- Overall Emissions three-Month Rolling Average Emissions Recordkeeping Form - single page
- Annual Solvent Consumption Recordkeeping Form - single page
- Compliance Determination Worksheet - single page

Notifications and Reporting

- Initial Notification Report for New Machines - 2 pages
- Initial Notification Report for Existing Machines - 2 pages
- Initial Statement of Compliance (Overall HAP Emission Limit) - 2 pages
- Annual Compliance (Emissions) Report - 2 pages
- Exceedance Report - 2 pages

Additional forms are available for facilities electing to comply with equipment requirements and work practices, and for degreasers without a solvent/air interface.

HOW LONG AM I REQUIRED TO MAINTAIN RECORDS AT MY SITE?

All records related to compliance with this NESHAP Subpart T need to be kept for five years.

WHEN DO I NEED TO COMPLY WITH SUBPART T REQUIREMENTS?

The compliance date for your facility depends on the startup date, which determines whether your equipment is classified as new or existing. Compliance dates are listed in Table II.

WHAT SHOULD I DO IF I PLAN TO DISCONTINUE USE OF A LISTED HAP SOLVENT OR EQUIPMENT SUBJECT TO SUBPART T?

Facilities that submitted an Initial Notification Report, but have subsequently stopped, or intend to stop using the equipment or halogenated solvents regulated by Subpart T, need to notify the District of the intended change and, again, to confirm that the changeover is complete. Notifications should be submitted to the District as soon as possible, but must be received before December 2, 1997 in order to remain in compliance with Subpart T. The District will transmit all notices to EPA.

IF MY EQUIPMENT IS IN A "NOT TO OPERATE" STATUS, AM I IN COMPLIANCE WITH SUBPART T?

No, the "Not to Operate" status (District Fee Schedule 49A) does not satisfy the requirements of Subpart T. A Permit to Operate a halogenated solvent degreaser needs to be retired or modified. Please contact Ron McInnes at (619) 694-3965 for additional information regarding permit modifications.

As an alternative, you may elect to comply with the requirements of Subpart T, which would include, at a minimum, the Initial Notification, Initial Compliance Report, and Biennial Exceedance Reports stating that the equipment was not in operation. Five years of recordkeeping would also be required.

HOW DOES SUBPART T AFFECT COMPLIANCE WITH DISTRICT RULE 67.6 - SOLVENT CLEANING OPERATIONS?

Subpart T does not affect compliance with District Rule 67.6 - Solvent Cleaning Operations. In addition to Subpart T requirements, degreasers currently subject to District Rule 67.6 have to comply with this rule and with their existing Permit to Operate conditions. Modifications to equipment, operating parameters, solvents, usage rates, or permit conditions may require an application and District approval prior to modification. Please contact Ron McInnes at (619) 694-3965 for additional information regarding permit modifications.

HOW WILL SUBPART T BE IMPLEMENTED?

Subpart T - National Emission Standards for Halogenated Solvent Cleaning is included in Appendix B in the Appendices to the District's Rules and Regulations. The District will implement and enforce the requirements of the NESHAP Subpart T locally without formally adopting a specific rule, as allowed by state law and in accordance with procedures approved by the Air Pollution Control Board.

The District will serve as the primary point of contact for facilities. Requests for and return of Initial Notification and Compliance Reports, Annual Reports, and Exceedance Reports should be directed to:

San Diego Air Pollution Control District
9150 Chesapeake Drive
San Diego, CA 92123
Attn.: Debbie Ryan
Phone: (619) 694-3838

All completed and signed notification and reporting forms will be verified by the District before forwarding to EPA on your behalf. Pursuant to federal regulations, failure to submit the required information could result in an enforcement action by EPA.

HOW CAN I OBTAIN A COPY OF THE ACTUAL REGULATION?

You may obtain a copy of the federal regulation, Subpart T - National Emission Standards for Halogenated Solvent Cleaning by:

- referring to Federal Register/Vol. 59, No. 231/p61805 December 12, 1994
- purchasing the District's Rules and Regulations, including appendices, by calling the District at (619) 694-8851,
- accessing EPA's Electronic Bulletin Board System at (919) 541-5742, or
- calling the regional EPA office at (415) 744-1182.

I NEED HELP . . .

If you have any questions regarding Subpart T, please contact any of the following persons:

San Diego Air Pollution Control District

- Debbie Ryan for questions regarding Subpart T (619) 694-3838
- Ron McInnes for Permit Assistance (619) 694-3965
- Paul Davis, Small Business Liaison (619) 694-2288

EPA Region IX (San Francisco)

- Michael Stenburg (415) 744-1182

EPA Headquarters (North Carolina)

- Paul A. Almodovar (919) 541-0283
- EPA Technology Transfer Network - Assistance Line (919) 541-5384
- EPA Technology Transfer Network - Bulletin Board (919) 541-5742
- EPA Control Technology Center (919) 541-0800

For additional information, see the *District Advisory for Federal Reporting Requirements for Halogenated Solvent Cleaning Machines*. This Advisory was sent to all affected sources on September 26, 1995. If you need a copy of the Advisory, please contact Juanita Ogata at (619) 694-8851.

Other publications related to this regulation include:

- *New Regulation Controlling Air Emissions From Solvent Cleaning Machines (Degreasers)* (EPA-453/F-94-083), March 1995.
- *Guidance Document for the Halogenated Solvent Cleaner National Emission Standards for Hazardous Air Pollutants (NESHAP)* (EPA-454/R-94-081), April 1995.

These documents are available from the EPA Library at (919) 541-2777, the EPA Control Technology Center at (919) 541-0800, or through the District.

For information on available solvent substitutes and vendors, please contact the Stratospheric Ozone Protection Hotline at (800) 296-1996. They can also provide manuals describing alternatives to cleaning with methyl chloroform and CFC-113 in:

- metals cleaning
- precision cleaning
- electronics cleaning
- aircraft maintenance cleaning
- no-clean processes for electronics assembly, and
- reduction in use of CFC-113 and methyl chloroform through conservation practices.

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

SUMMARY TO NESHAP SUBPART T

APPENDIX A

**TEST METHOD AND EMISSION CALCULATIONS
FOR FACILITIES WITH BATCH VAPOR OR IN-LINE DEGREASERS
ELECTING TO COMPLY WITH THE OVERALL HAP EMISSION LIMIT**

I. Determine Monthly Solvent Emission Rate

To ensure that emissions from each degreaser are equal to or less than the overall HAP emission limit, HAP emissions must be calculated on a monthly basis and evaluated as a three-month rolling average. Compliance with the overall HAP emission limit shall be determined using the following method which must be executed on the first operating day of every month:

1. Ensure that the degreaser system contains only clean liquid solvent (limited to fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils).
2. A fill-line must be indicated during the first month the measurements are made.
3. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly HAP emissions.
4. Calculate the monthly HAP emission rate using Equation 1:

$$E_i = \frac{SA_i - LSR_i - SSR_i}{AREA_i} \qquad \text{Equation 1}$$

where:

E_i = the total halogenated HAP solvent emission rate from the degreaser during the most recent monthly reporting period i (in kilograms (kg) of solvent per square meter of solvent/air interface area per month)

SA_i = the total amount of halogenated HAP liquid solvent added to the degreaser during the most recent monthly reporting period i (kg of solvent per month)

LSR_i = the total amount of halogenated HAP liquid solvent removed from the degreaser during the most recent monthly reporting period i (kg of solvent per month)

SSR_i = the total amount of halogenated HAP solvent removed from the degreaser as solid waste during the most recent monthly reporting period i (kg of solvent per month), determined using EPA Reference Method 25 or engineering calculations included in the compliance report.

$AREA_i$ = the solvent/air interface area of the degreaser in square meters.

II. Determine the Three-Month Rolling Average Solvent Emission Rate

Determine the monthly rolling average EA_i for the three-month period ending with the most recent month using Equation 2:

$$EA_i = \frac{E_i - E_{(i-1)} - E_{(i-2)}}{3} \quad \text{Equation 2}$$

where:

EA_i = the average halogenated HAP solvent emission rate over the preceding three month period (kg of solvent per square meter of solvent /air interface area per month)

E_i = the total halogenated HAP solvent emission rate from the degreaser during the most recent monthly reporting period i (in kilograms (kg) of solvent per square meter of solvent/air interface area per month)

$E_{(i-1)}$ = the total halogenated HAP solvent emission rate from the degreaser during the monthly reporting immediately prior to period i (in kilograms (kg) of solvent per square meter of solvent/air interface area per month)

$E_{(i-2)}$ = the total halogenated HAP solvent emission rate from the degreaser during the monthly reporting immediately prior to period $i-1$ (in kilograms (kg) of solvent per square meter of solvent/air interface area per month)