

**ENGINEERING EVALUATION REPORT  
SOLVENT COLD CLEANERS  
LOSS OF EXEMPTION**

**Plant Name:** United States Pipe and Foundry

**Plant Number:** 83

**Application Number:** 00157

**BACKGROUND**

The Applicant is applying for a Permit to Operate for one or more solvent cold cleaners that was/were exempt from permit requirements until September 1, 1999. The "Loss of Exemption" is triggered by amendments to Regulation 8, Rule 16. On September 16, 1998, Section 8-16-303.5 was added to impose a 50 gram/liter VOC standard for cold cleaners. This standard becomes effective on September 1, 1999. At the same time, two limited exemptions were added to Reg. 8-16. These sections appear below.

<b>8-16-303</b>	<b>Cold Cleaner Requirements:</b> Any person who operates a cold solvent cleaning device shall conform to the following requirements. 303.5 Effective September 1, 1999, the VOC content of the cleaning solution used in a cold cleaner shall not exceed 50 g/l (0.42 lb/gal). Cold cleaners meeting the requirements of this section are not required to comply with subsection 8-16-303.4.
<b>8-16-121</b>	<b>Limited Exemption, Single Cold Cleaner:</b> Effective September 1, 1999, the VOC content limitation in Section 8-16-303.5 for cleaning solutions used in cold cleaners does not apply to one cold cleaner per facility, provided that annual solvent loss from that cold cleaner does not exceed 20 gallons per year.
<b>8-16-122</b>	<b>Limited Exemption, Permitted Cold Cleaners:</b> Effective September 1, 1999, the VOC content limitation in Section 8-16-303.5 for cleaning solutions used in cold cleaners does not apply to any cold cleaner for which a District permit to operate has been obtained pursuant to Regulation 2, Rule 1.

These changes to Reg. 8-16 have the following impacts:

- A facility may operate only one (1) exempt cold cleaner using solvent with a VOC content greater than 50 g/l, provided the solvent loss from that cleaner is  $\leq 20$  gal/yr.
- Any additional cold cleaners must comply with the VOC standard in 8-16-303.5 ( $\leq 50$  g/l VOC) in order to remain exempt.
- Any permitted cold cleaner is exempt from the VOC standard in 8-16-303.5, and therefore, may continue to use cleaning solvent with a VOC content greater than 50 g/l.

The applicant has opted to permit the cold cleaners addressed in this application, rather than switch to cleaning solvent that meets the 50 g/l standard in Reg. 8-16.303.5.

**EMISSION SUMMARY**

Each solvent cold cleaner permitted under this application is considered a “loss of exemption” source per Reg. 2-1-424, and therefore, is not a new or modified source. Consequently, there is no cumulative emission increase associated with this permit application, per Reg. 2-2-212.

**Cumulative Increase = ZERO for all pollutants**

POC/NPOC emission calculations may be useful for emission inventory purposes, or for determining actual facility emissions for future emission offset determinations. A properly completed Data Form S for each cold cleaner will enable the District to update the databank emission inventory. Therefore, actual emission calculations are not necessary as part of this application.

**STATEMENT OF COMPLIANCE**

Each cold cleaner is subject to the “loss of exemption” P/O fee in Regulation 3. Per Schedule E, the minimum P/O fee for each cold cleaner is \$100.00. The applicant has paid applicable permit fees for this application.

Each solvent cold cleaner is subject to the “Cold Cleaner Requirements” in Sections 8-16-303.1 through 303.4. The compliance data on the application form have been reviewed, and any non-complying conditions have been corrected.

NESHAP: A cold cleaner with a solvent capacity greater than or equal to 2 gallons AND which uses a solvent with more than 5% by weight of any one or a combination of the following halogenated solvents (carbon tetrachloride, chloroform, perchloroethylene, 1,1,1-trichloroethane, trichloroethylene, or methylene chloride) is subject to the Halogenated Solvent Cleaner NESHAP.

- Cold cleaners are not subject to NESHAP  
 -OR-  
 Cold cleaner(s) complies with NESHAP by: *(check all that apply)*
- Cover and 2.5 cm (1 in.) water layer;
  - Cover and 0.75 freeboard ratio; or
  - Cover (remote reservoir only).

Because each cold cleaner is a “loss of exemption” source, it is not considered to be a new source, per Reg. 2-2-225. Therefore, each cold cleaner is not subject to the following:

- NSR BACT or offset requirements of Reg. 2-2-301 / 302;
- Toxic Risk Management Policy; and
- Public notification requirements of Reg. 2-1-412.

The proposed project is considered ministerial under Regulation 2-1-311 and therefore is not subject to California Environmental Quality Act (CEQA) review. The engineering review for this project requires no more than the application of standard permit conditions and standard emission factors as described in the District's Permit Handbook (chapter 6.1 for cold solvent cleaning), and therefore is not discretionary as defined by CEQA.

**PERMIT CONDITIONS**

## Permit Conditions for S-42

1. Net usage of Safety-Kleen 105 Solvent at S-42 shall not exceed 15 gallons in any consecutive 12-month period. (basis: Cumulative Increase)

2. Cleanup solvent other than the material specified in Condition 1, and/or usage in excess of that specified in Condition 1, may be used, provided that the Permit Holder can demonstrate that all of the following are satisfied:
  - a. Total POC emissions from S-42 do not exceed pounds in any consecutive 12-month period; and
  - b. Total NPOC emissions from S-42 do not exceed pounds in any consecutive 12-month period; and
  - c. The use of these materials does not increase toxic emissions above any risk screening trigger level.  
(basis: Cumulative Increase and Toxic Risk Screen)
3. To determine compliance with the above conditions, the Permit Holder shall maintain the following records and provide all of the data necessary to evaluate compliance with the above conditions, including the following information:
  - a. Type and monthly usage of all POC and NPOC containing materials used;
  - b. If a material other than those specified in Condition 1 is used, POC, NPOC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Condition 2, on a monthly basis;
  - c. Monthly usage and/or emission calculations shall be totaled for each consecutive 12-month period.All records shall be retained on-site for two years, from the date of entry, and made available for inspection by District staff upon request. These requirements shall not replace the recordkeeping requirements contained in any applicable District Regulations.  
(basis: Cumulative Increase and Toxic Risk Screen)

#### Permit Conditions for S-43

1. Net usage of Safety-Kleen 105 Solvent at S-43 shall not exceed 15 gallons in any consecutive 12-month period. (basis: Cumulative Increase)
2. Cleanup solvent other than the material specified in Condition 1, and/or usage in excess of that specified in Condition 1, may be used, provided that the Permit Holder can demonstrate that all of the following are satisfied:
  - a. Total POC emissions from S-43 do not exceed pounds in any consecutive 12-month period; and
  - b. Total NPOC emissions from S-43 do not exceed pounds in any consecutive 12-month period; and
  - c. The use of these materials does not increase toxic emissions above any risk screening trigger level.  
(basis: Cumulative Increase and Toxic Risk Screen)
3. To determine compliance with the above conditions, the Permit Holder shall maintain the following records and provide all of the data necessary to evaluate compliance with the above conditions, including the following information:
  - a. Type and monthly usage of all POC and NPOC containing materials used;
  - b. If a material other than those specified in Condition 1 is used, POC, NPOC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Condition 2, on a monthly basis;
  - c. Monthly usage and/or emission calculations shall be totaled for each consecutive 12-month period.All records shall be retained on-site for two years, from the date of entry, and made available for inspection by District staff upon request. These requirements shall not replace the recordkeeping requirements contained in any applicable District Regulations.  
(basis: Cumulative Increase and Toxic Risk Screen)

**PERMIT TO OPERATE RECOMMENDATION**

Staff recommends that the Applicant be issued a **Permit to Operate with Conditions**, and an **effective date of September 1, 1999**, for the equipment listed below.

**S-42 Solvent Cold Cleaner #2, Safety- Kleen Model 16; 10 gallon capacity**

**S-43 Solvent Cold Cleaner #3, Safety- Kleen Model 16; 10 gallon capacity**

**EXEMPTIONS*****Sources exempt from 8-16-303.5 VOC Standard:***

Per Reg. 8-16-122, each source above for which a P/O is issued is exempt from the cleaning solvent VOC standard in Reg. 8-16-303.5.

***One Source Exempt from Permits and from 8-16-303.5 VOC Standard:***

Per Reg. 8-16-121, this facility may have one exempt (from permits) cold cleaner that is also exempt from the 50 g/l cleaning solution VOC standard in Reg. 8-16-303.5. For a source to be exempt from both permits and the 50 g/l VOC standard, a source must meet all of the following criteria:

- a. Volatile Organic Compounds used which have initial boiling points greater than 302°F and the initial boiling point exceeds the maximum operating temperature by at least 180°F.
- b. The equipment or container has a capacity of less than 35.1 gallons of liquid; for remote reservoir cold cleaners, capacity is defined as the volume of the remote reservoir.
- c. The equipment or container has a liquid surface area less than 7 ft<sup>2</sup>; or for remote reservoir cold cleaners, the sink or working area has a horizontal surface area less than 7 ft<sup>2</sup>.
- d. If solvent flow is used, only a continuous fluid stream is used (not a fine, atomized, or shower type spray).
- e. Solvent loss (evaporation) from the cold cleaner does not exceed 20 gallons per year.

Staff recommends that the Applicant be issued a **Certificate of Exemption** for the cold cleaner described below.

**Solvent Cold Cleaner #1, Safety- Kleen Model 16; 10 gallon capacity**

**(Exempt from permit and 8-16-303.5 per Regulation 8-16-121)**

Application Reviewed By: \_\_\_\_\_

(signature)

Date: 12/1/99

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