

## **Solvent Cleaning: Degreasing Operations NACT 233**



### **What This Class Is About**

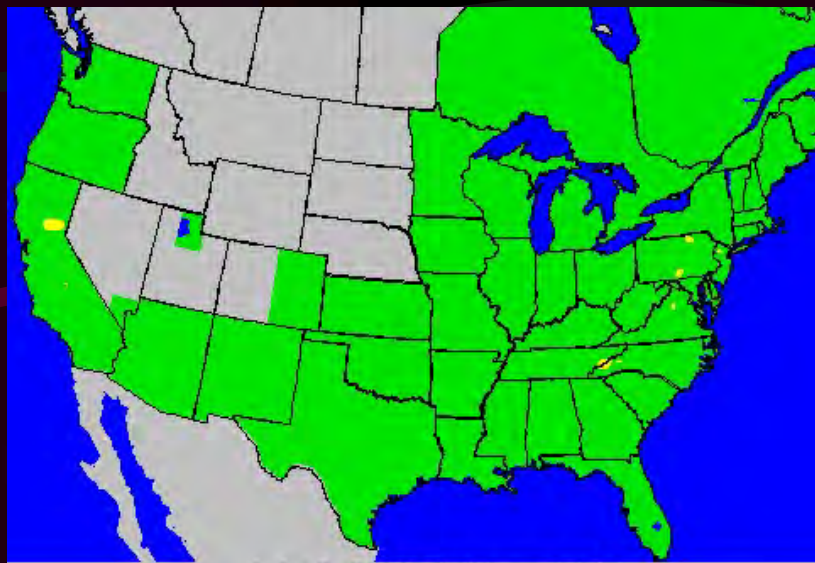
- **Descriptions Of The Solvents**
- **Descriptions Of The Solvent Process**
- **Regulation Requirements**
- **Inspection Procedures**

## Why Are We Interested?



- Solvents Emissions In California
- California Clean Air Act
- Air Pollution Health Concerns
- Ozone Problems

## OZONE Formation





### Soil Categories

- Organics
  - rosins, glycols, oils, greases, waxes
- Water Soluble Inorganic Salts
  - chlorides, sulfates, etc.
- Insoluble Particles
  - dirt, dust, metal fines, etc.



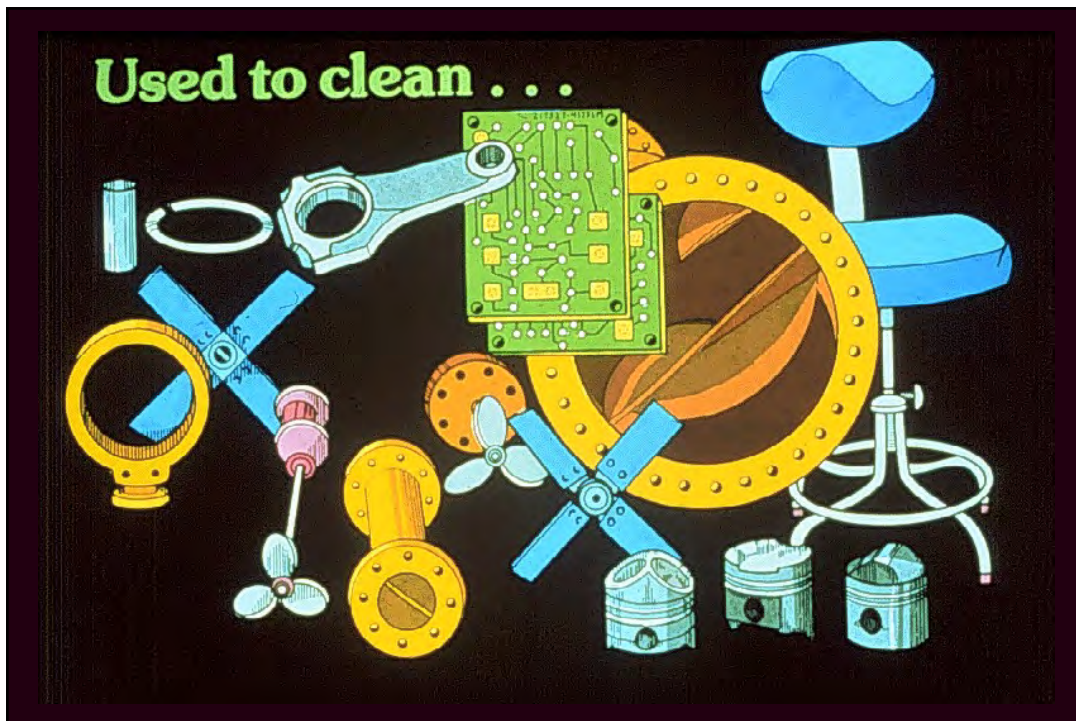
### Switching To Aqueous or Semi-Aqueous Cleaners

- Water-Based (Aqueous)
  - Alcohols
  - Alkaline Detergents
  - Surfactants
  - Saponifiers
- Citrus Based (Semi-Aqueous)
  - Terpenes
- Lower VOC Products
  - Hydrocarbons with Surfactants and Rust Inhibitors
  - Glycol Ethers
  - Acetone



## Solvent Applications

- Metal Working
  - Automotive
  - Electronics
  - Appliance
  - Furniture
  - Jewelry
  - Plumbing
  - Aircraft
  - Refrigeration
  - Business Machinery
  - Fasteners
  - Etc.
- (pp 200-3)



## California Solvent Degreasing Usage

- 2001: Stationary sources emitted 90 Tons Per Day of ROG's
- 46% of the stationary source VOC emissions
- 1994: >20,000 tons/yr. of VOC's

## Storing Solvents

- Sealed Containers
- Properly Labeled
- No Leaks
- Protected Areas
- Hazardous Waste

## Solvent Cleaning Classifications

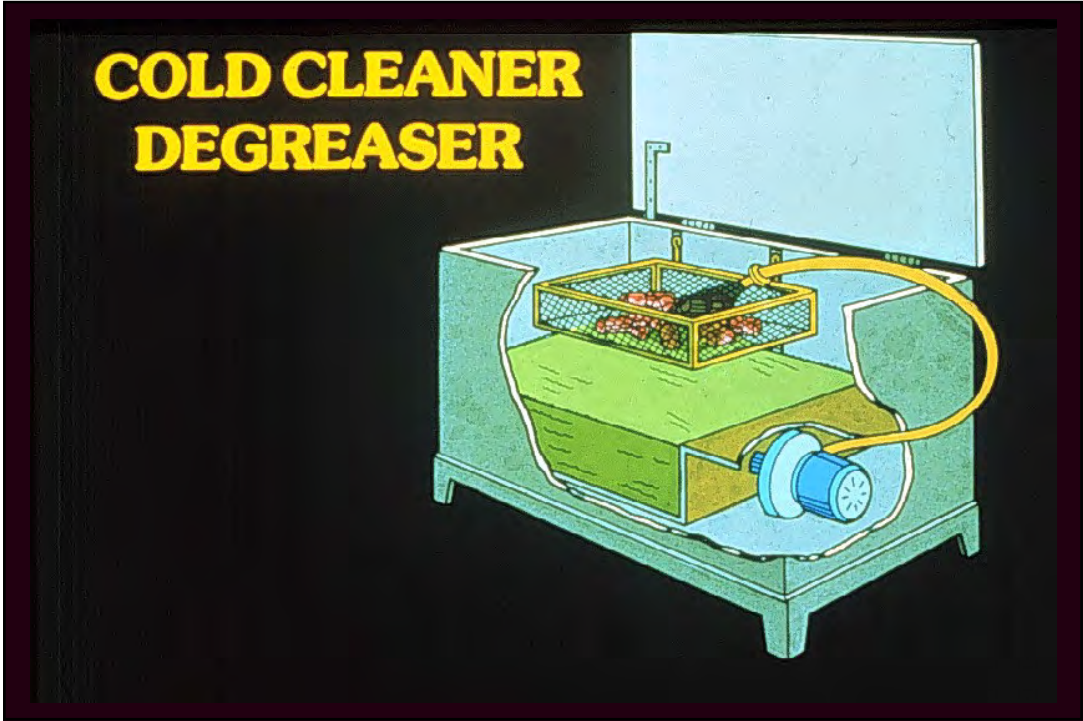
- Cold Cleaning
- Open Top Vapor Cleaning
- ConveyORIZED Cleaning

## Cold Cleaning



- Uses All Types Of Solvents
- ~55%-60% Of Solvent Emissions
- Average Unit Emission: ~.3 TPY
- Includes
  - Spraying
  - Brushing
  - Flushing &
  - Immersion

(pp 300-1 & 2)









Wash Basin  
with Remote  
Reservoir

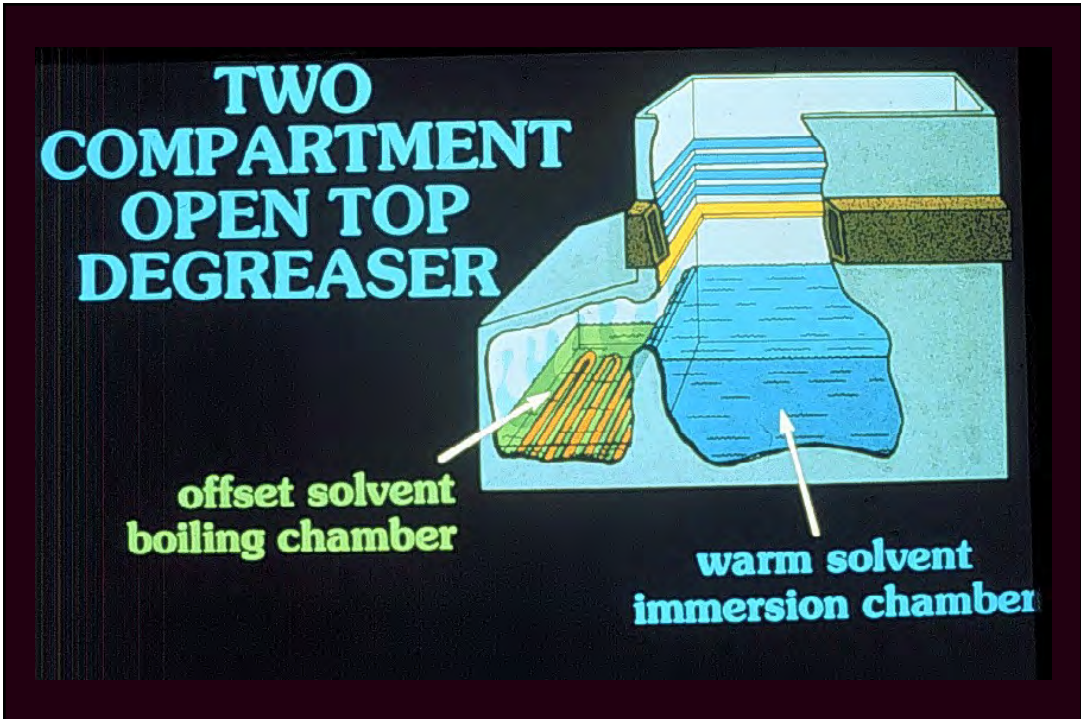
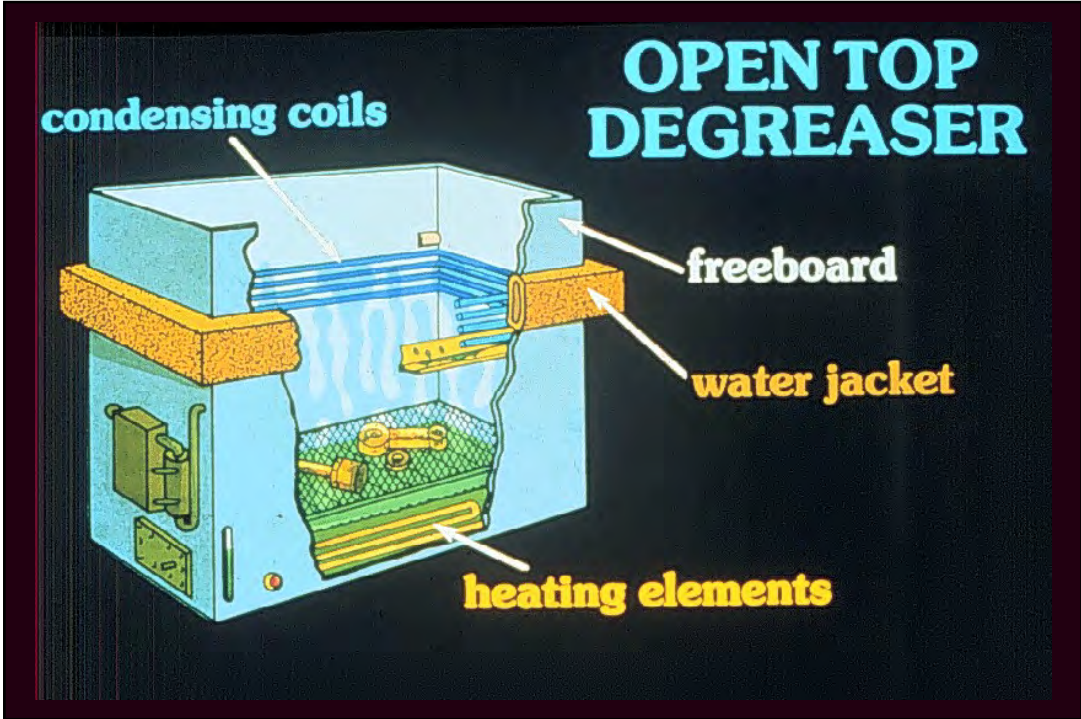




## Open Top Vapor Cleaning

- Emit ~200,000 Metric Tons Or 30% Of The National Solvent Cleaning Emissions
- Are Batch Loaded
- Clean Through The Condensation Of Hot Solvent Vapor On Colder Parts
- >100,000 Tons/yr. Of Halogenated Solvents Are Used In This Type Of Cleaner In U.S.

(pp 200-8)







Solvent



Sprays

## Open Top Vapor Cleaners



### Important Elements:

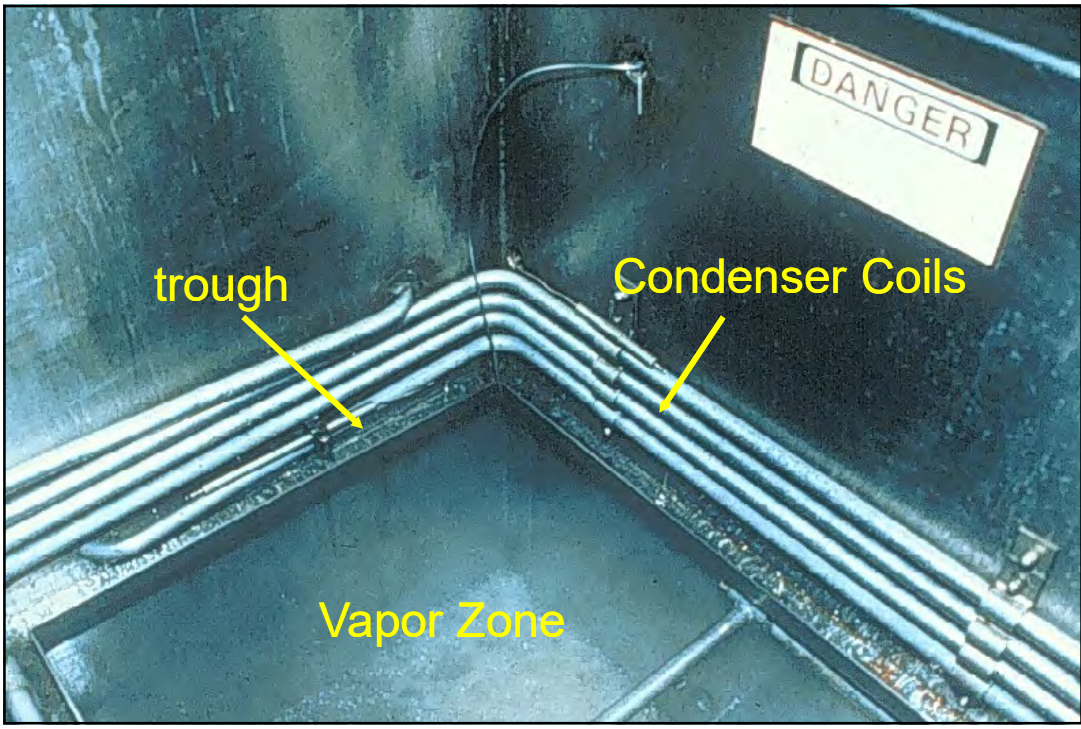
- Condenser Coils
- Freeboard
- Water Separators
- Covers

(pp 300-7-13)

## Cooling Coils

- Located On Inside Walls Of Cleaner
- Contains Vapor Zone With Cool Air Blanket Cover
- Usually Has Water As The Coolant

(pp 300-7)





## Freeboard

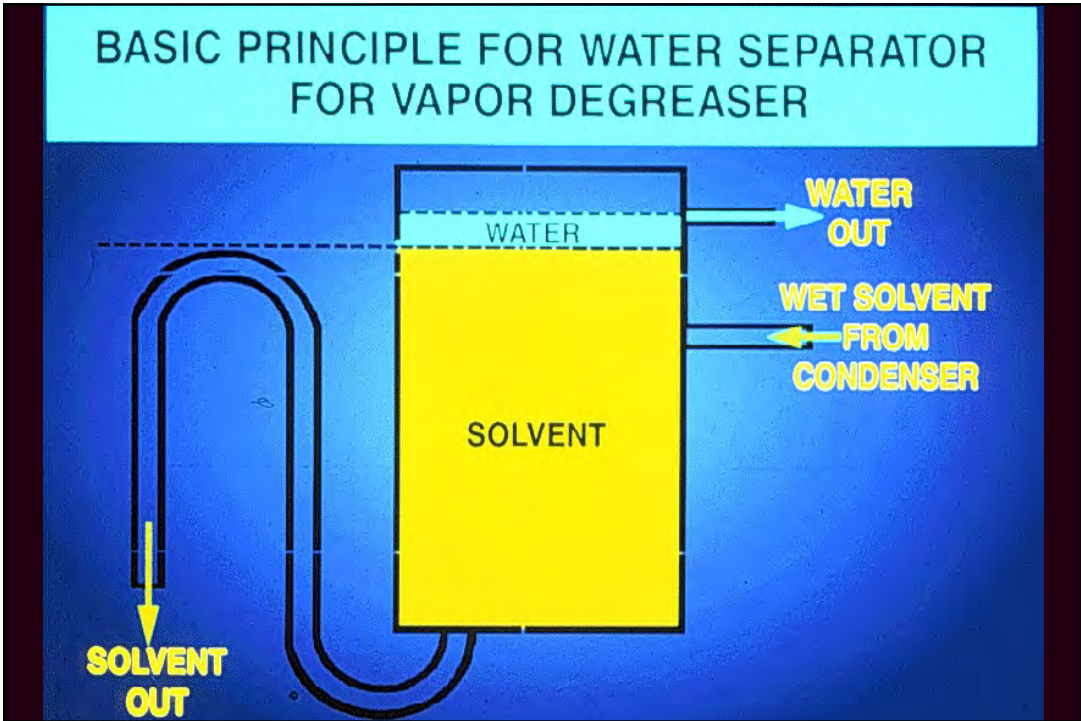
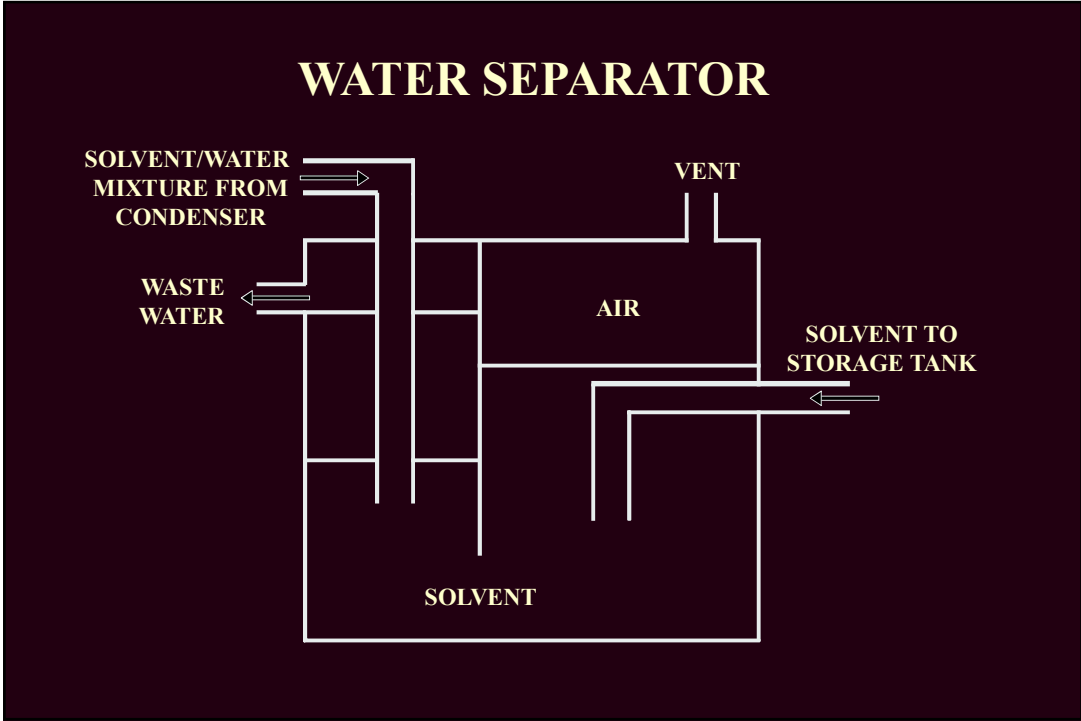
- Protects The Solvent Vapor Zone From Disturbance Caused By Air Movement Around The Equipment
- Generally Established By The Location Of The Condenser Coils

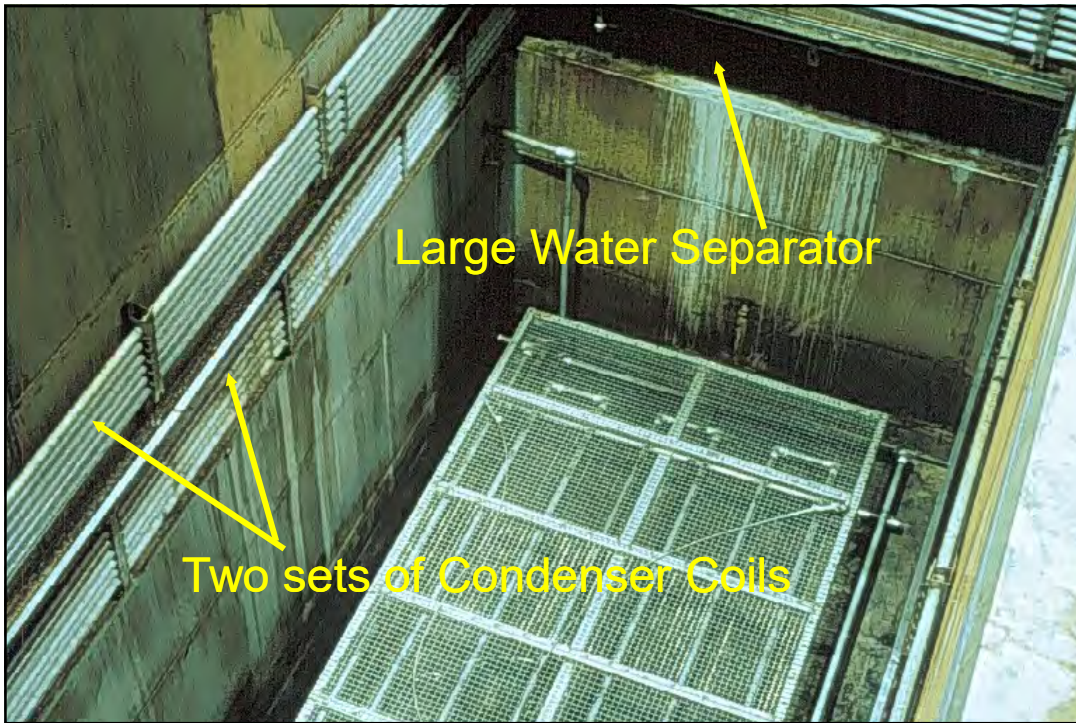
(pp 300-7)

## Water Separators

- Nearly All Vapor Cleaners Have Water Separators
- These Allow The Water That Condenses On The Coils To Separate From The Solvent Before The Solvent Is Reintroduced In The System

(pp 300-13)

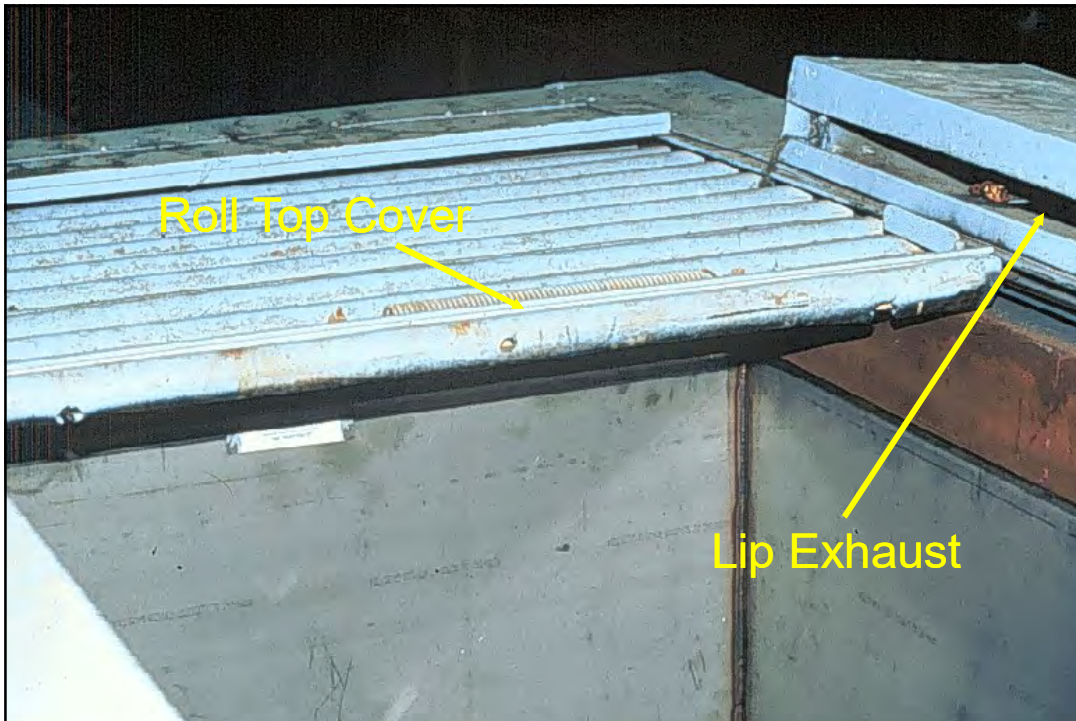




## Covers

- Historically Single Piece, Unhinged Metal Cover
- Newer Designs Might Have:
  - Roll-top Plastic Covers
  - Canvas Curtains
  - Hinged Counter Balanced Metal Covers

(pp 300-13)



## Conveyorized Degreasers

- Average Unit Emits About 25 Metric tpy.
- About 15% Of Nationwide total.
- There Are Seven Different Types:
  - Cross-Rod
  - Monorail
  - Vibra
  - Ferris Wheel
  - Belt
  - Strip
  - Circuit Board

(pp 300-14)

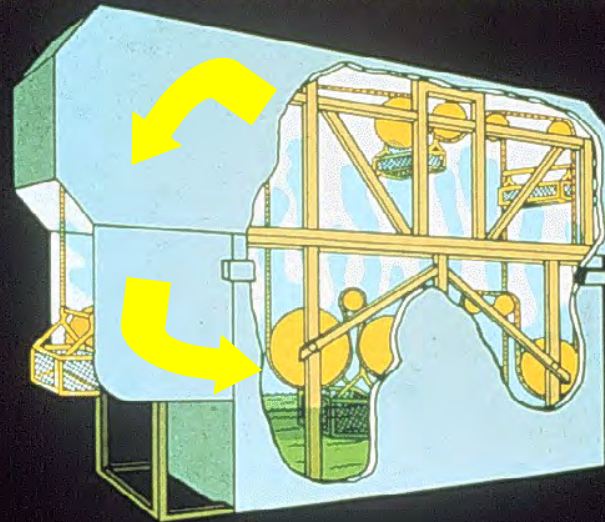
## Cross-Rod Degreaser

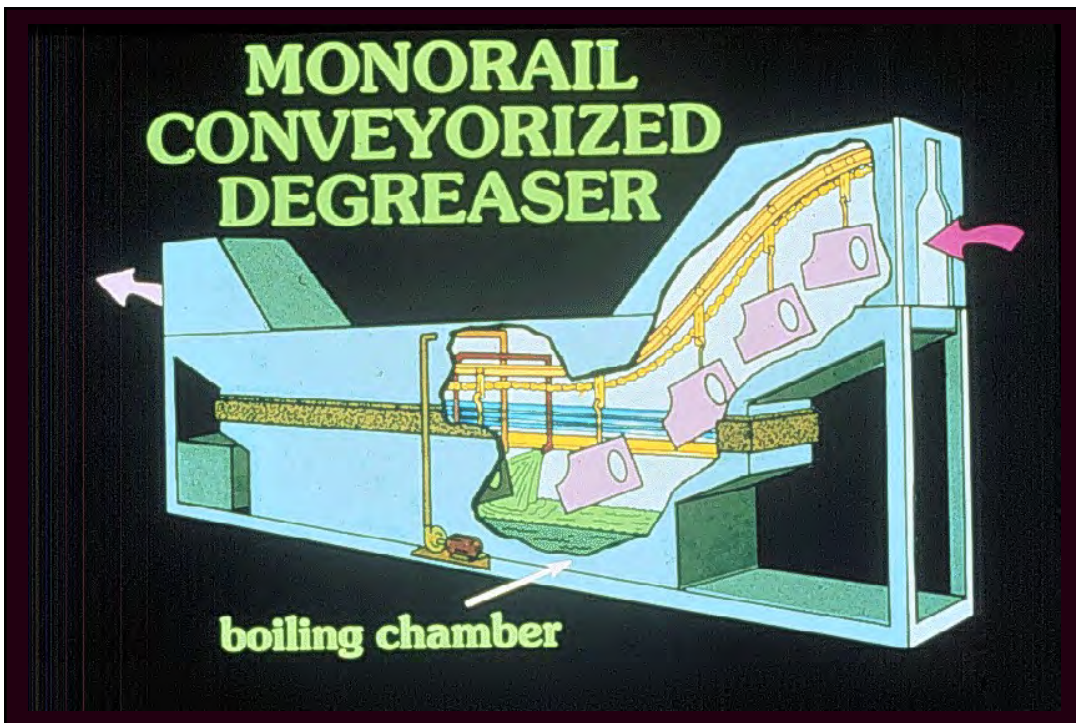
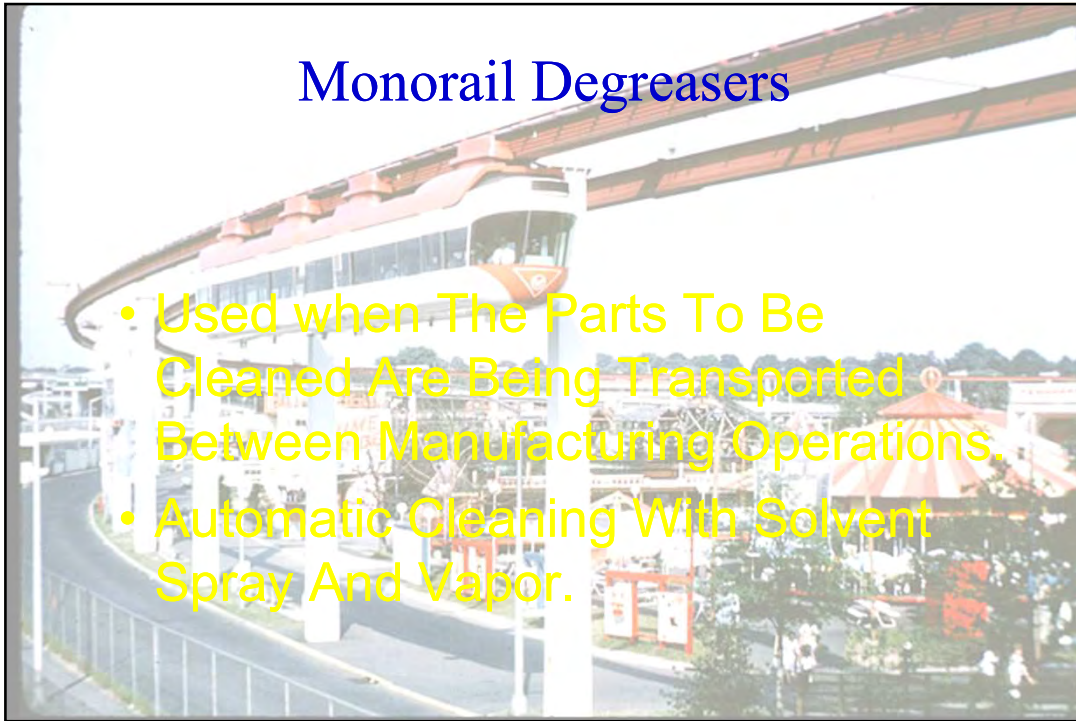


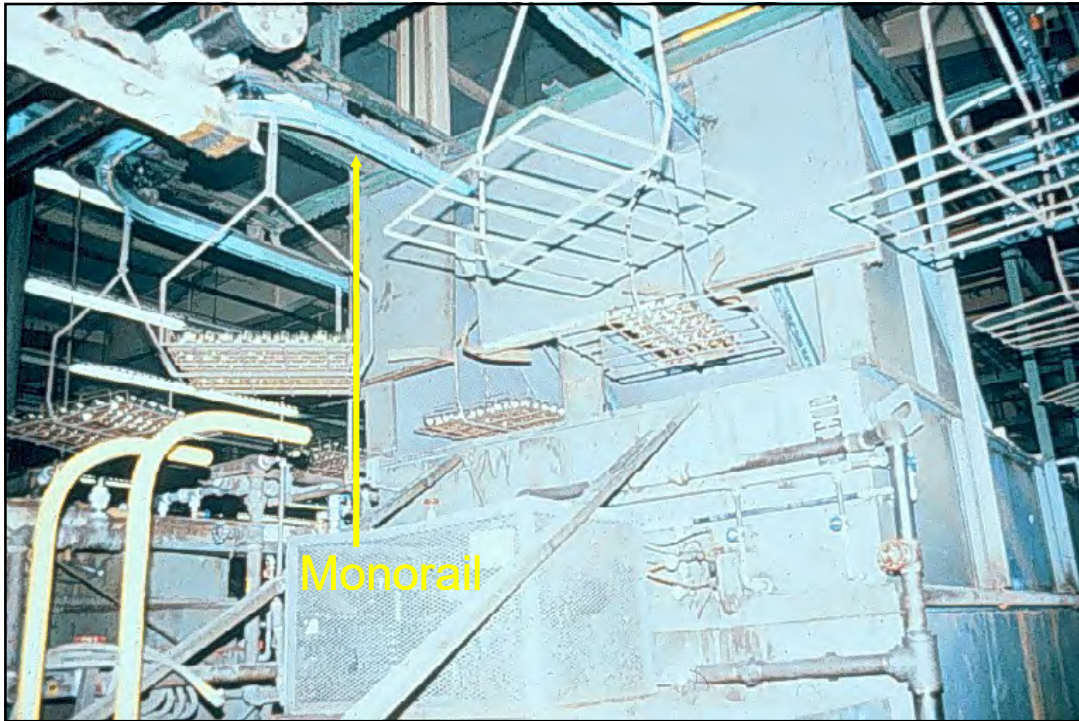
- Parts are supported by Rods Between The two Power Driven Chains.
- Designed To immerse Small Parts.

(pp 300-14)

## CROSS-ROD CONVEYORIZED DEGREASER





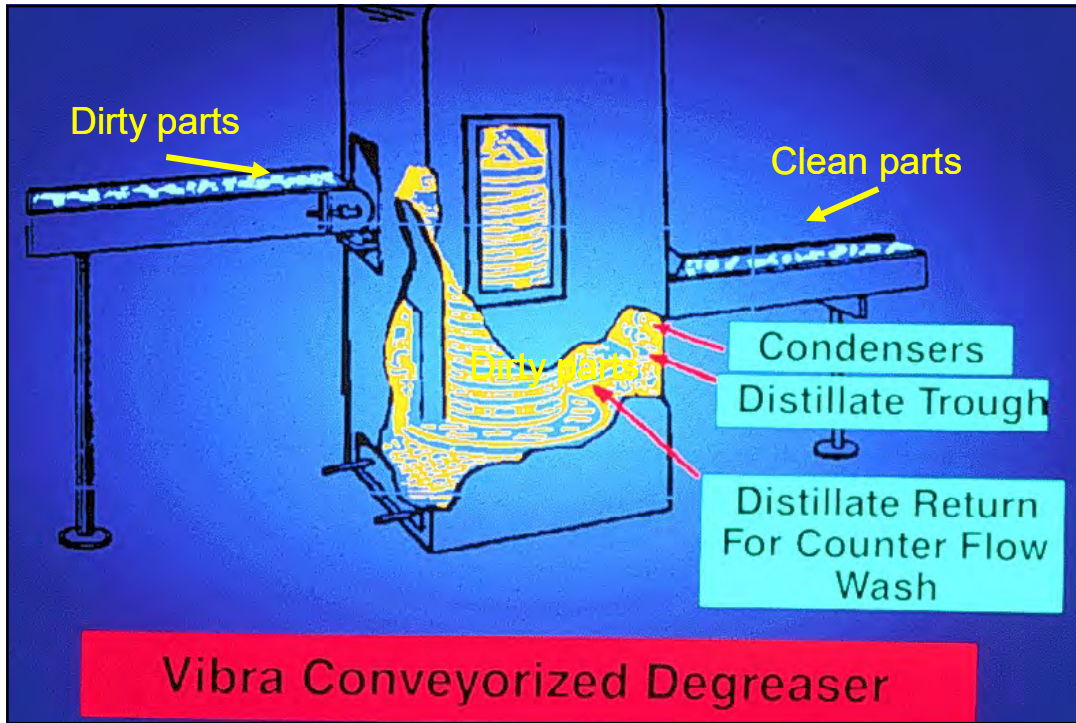


## Vibra Degreaser



- Metal Parts Are Vibrated From A Solvent Flooded Pan Up A Spiral Elevator To Dry Before Exiting.
- Capable Of Processing Small Parts.
- Vibratory Action Creates Considerable Noise.

(pp 200-14)



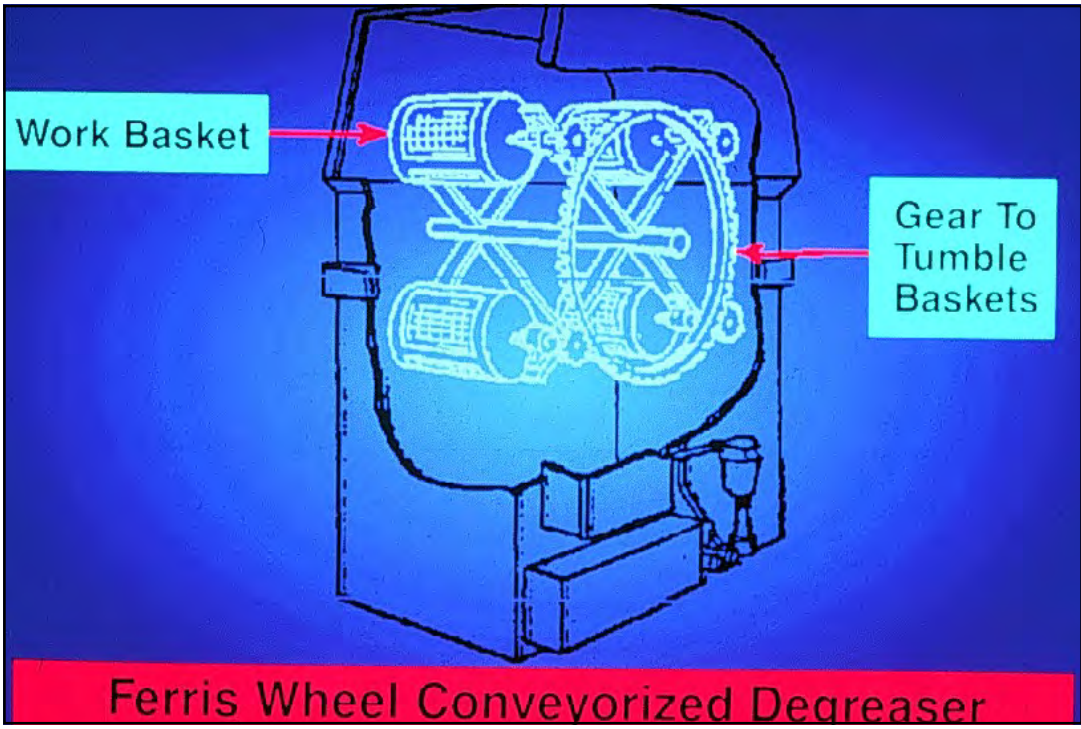
## Ferris Wheel Degreaser



- Least Expensive Conveyorized Degreaser
- Smallest.
- Uses Perforated Baskets

(pp 300-18)

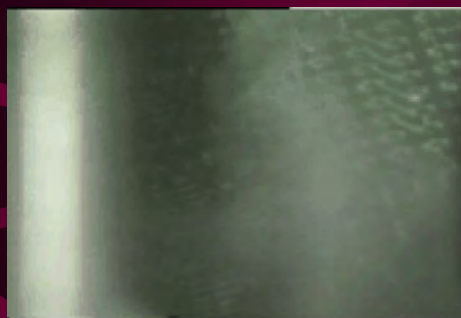




## Belt & Strip Degreasers

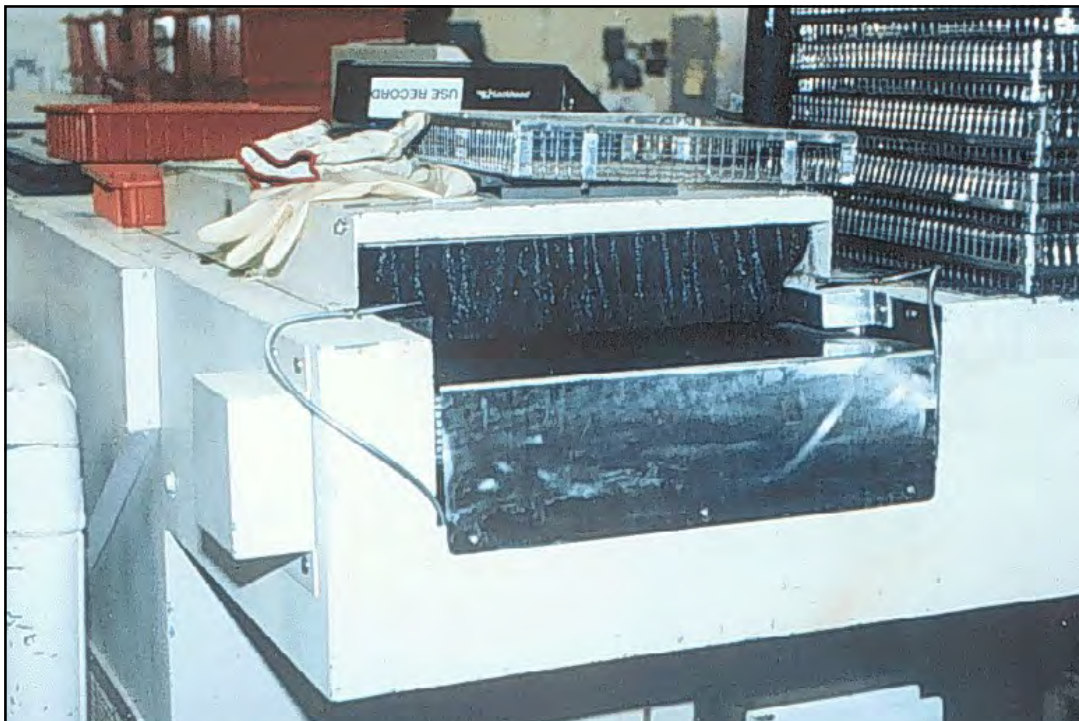
- Enables Simple Loading And Unloading Of Parts.
- Strip Degreaser Also Cleans The Strip While A Belt Degreaser Does Not.

## Circuit Board Cleaner

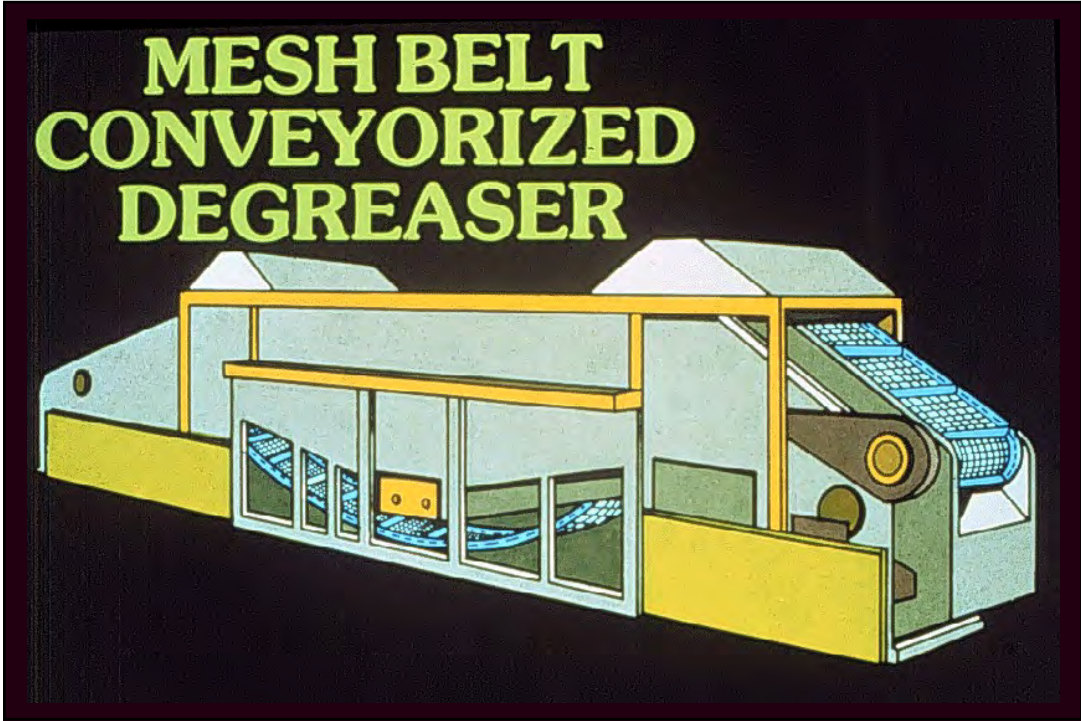


- Used Specifically In The Production Of Printed Circuit Boards.
- There Are Two Types:
  - Developers
  - Strippers

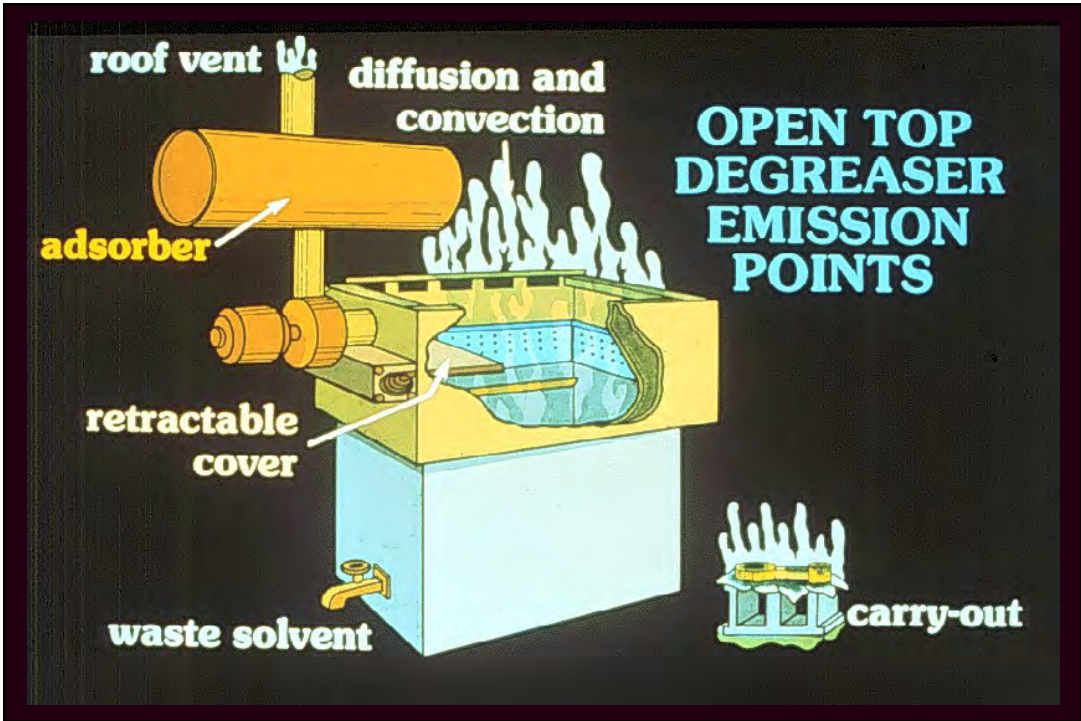
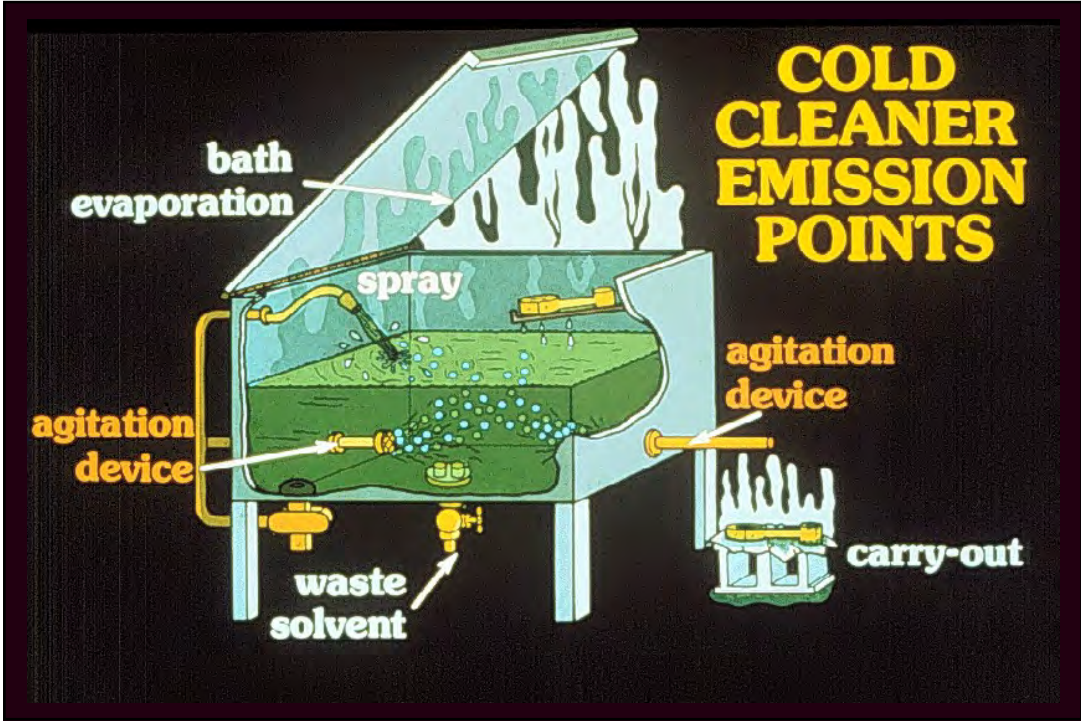
(pp 300-18)

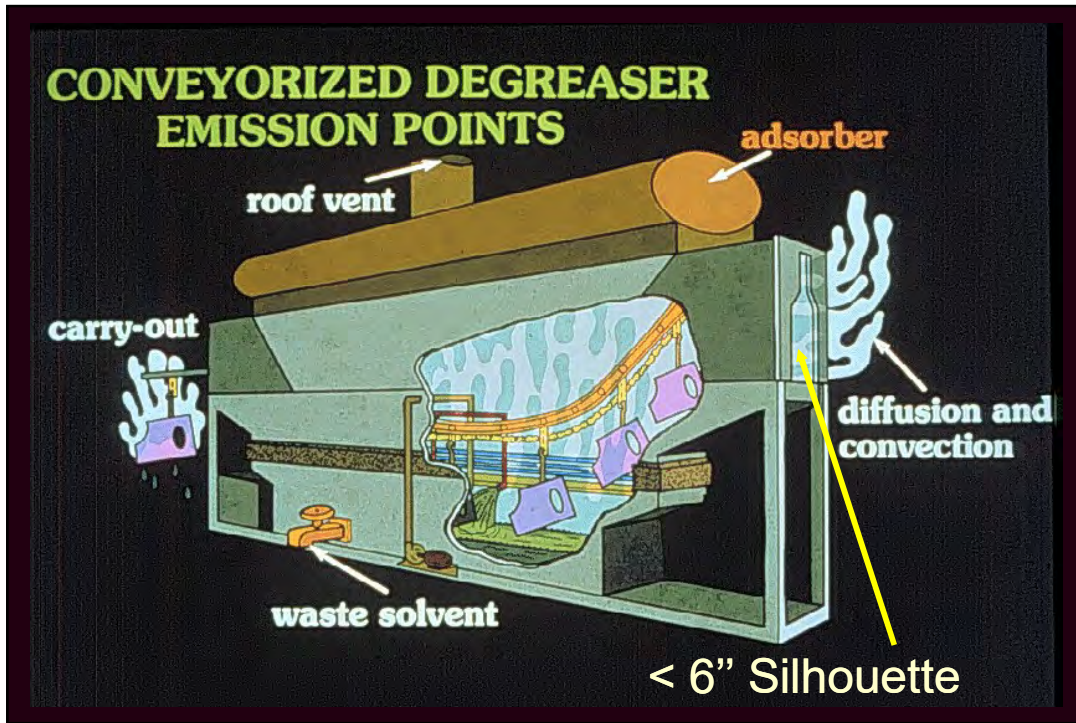












## Emissions Of Concern

VOC ---> O<sub>3</sub>

- VOC Emissions
- Toxic Emissions
- CFC Emissions

CFC ---> ~~O<sub>3</sub>~~

**DANGER**  
TOXIC  
VAPORS

(pp 300-18-19)





## Control Technology

- Improved Cover
- High Freeboard
- Refrigerated Chillers
- Carbon Adsorption
- Safety Switches
- Thermal Reduction



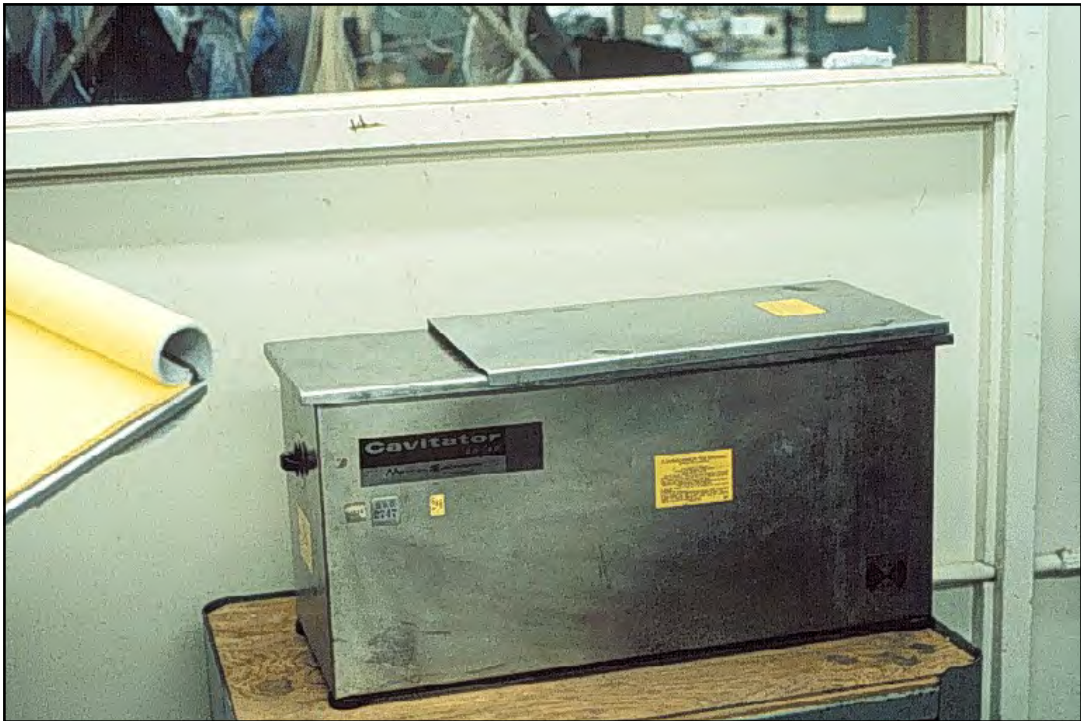
(pp 300-20)

## Improved Covers

- Single Most Important Control Device For Open Top Vapor Degreasers
- Open & Close In A Horizontal Direction
- Includes Plastic Covers, Canvas Curtains, And Guillotine Covers
- Also Includes Water Cover

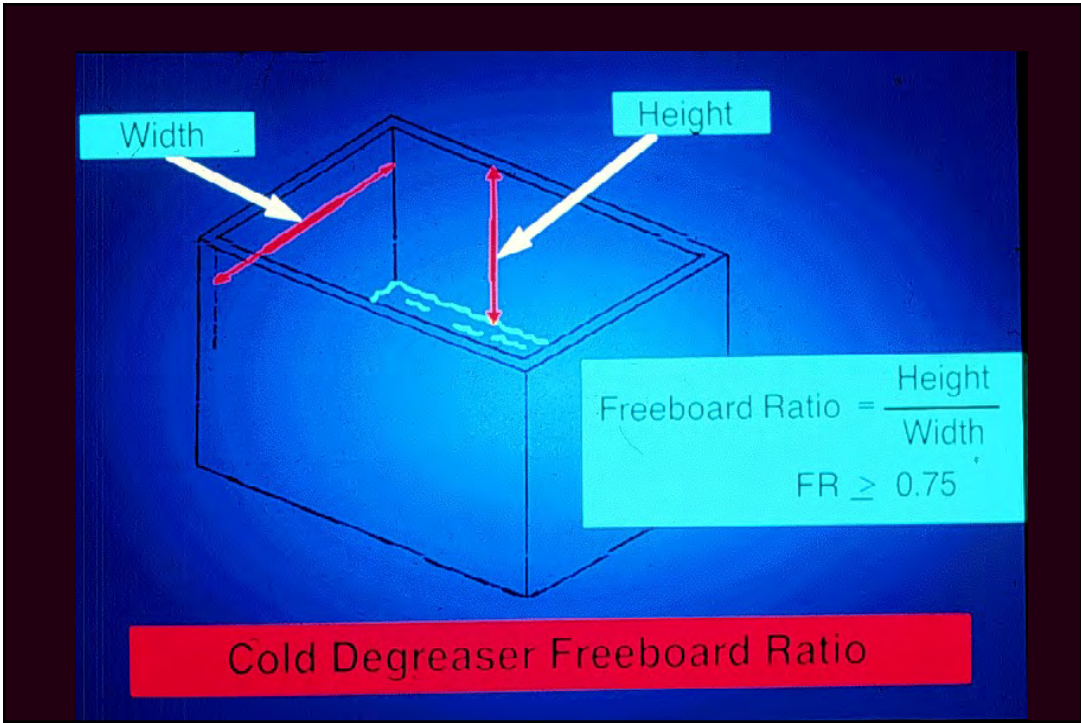
(pp 300-20-22)



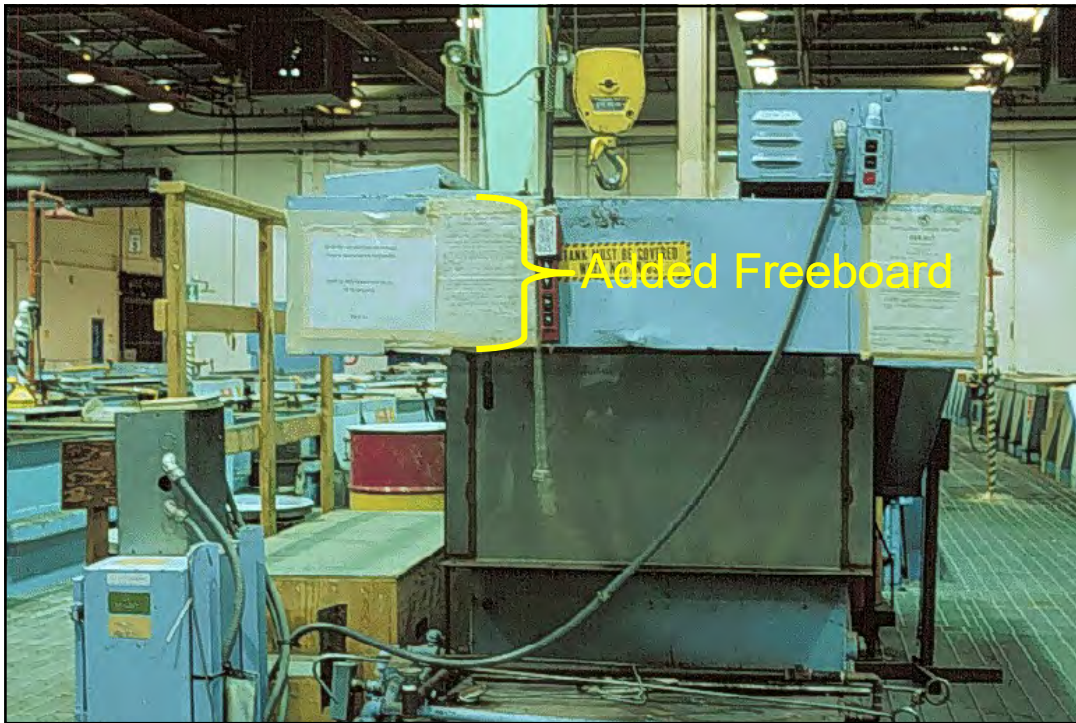




Measuring  
Freeboard



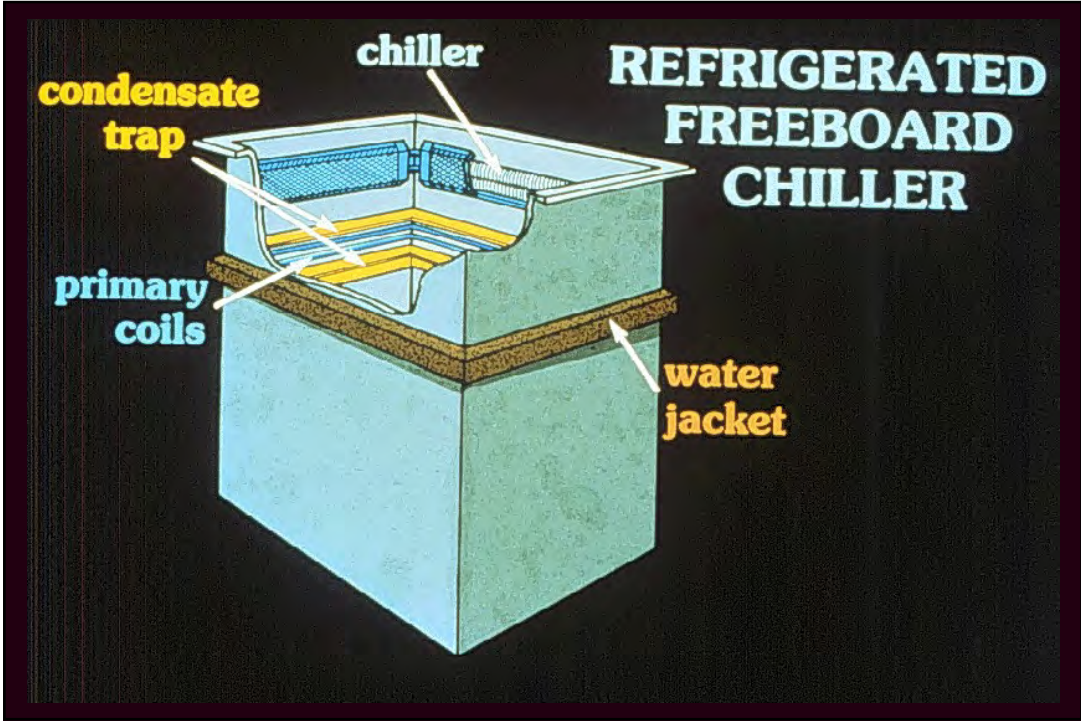




## Refrigerated Chillers

- Condenser Coils
  - Create Cold Air Blanket
  - Results In A Temperature Gradient
  - Provides A Stable Inversion Layer
- Chillers
  - Offers More Cooling
- Refrigerated Condenser Coils
  - Offers Portability when not plumbed

(pp 200-23-25)



## Adsorption

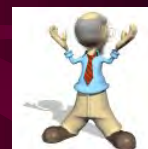
- Types Of Adsorbents:
  - Activated Carbon
  - Molecular Sieves
  - Silica Gels
- 90%+ Efficiency Possible
- Handles High VOC Concentrations
- High Humidity Decreases Efficiency
- VOC Mixtures Can Cause Problems



(pp 300-25 & 26)

## Safety Switches

- Prevent Emissions During Malfunctions And Abnormal Operation
- Five Main Types:
  - Vapor Level Control Thermostat
  - Condenser Water Flow And Thermostat
  - Sump Thermostat
  - Solvent Level Control
  - Spray Safety Switch



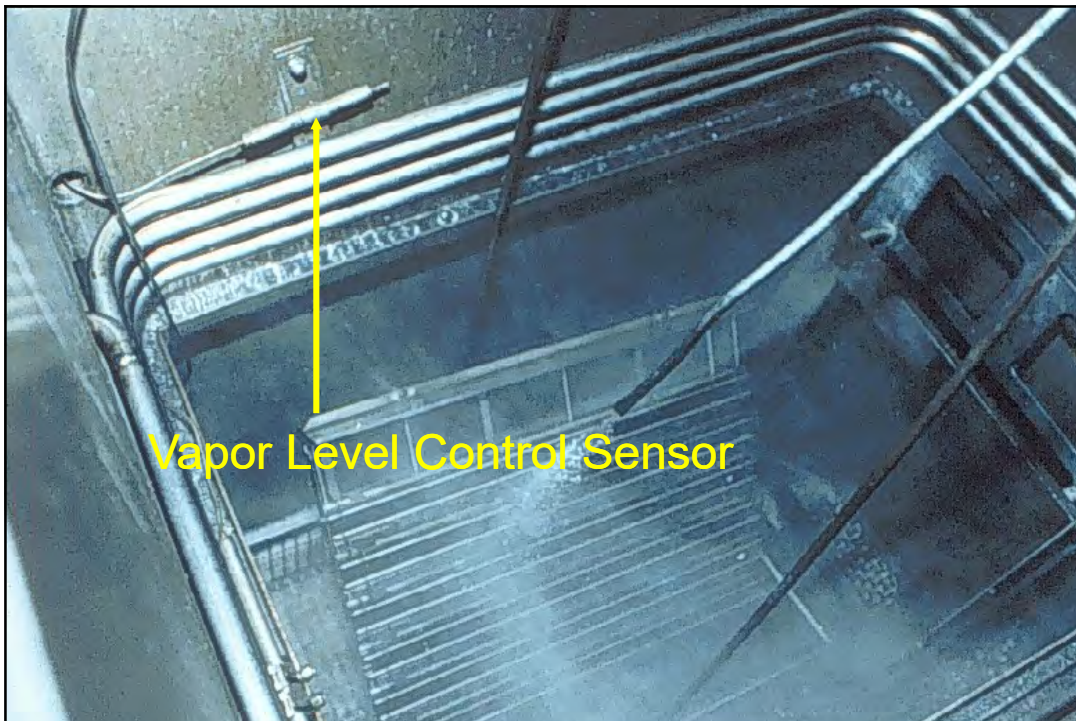
(pp 300-27)



## Vapor Level Control

- Most Important Switch
- Activated When Solvent Vapor Zone Rises Above The Designed Operating Level
- Turns Sump Heater Off
- For ConveyORIZED Degreasers, Should Activate an Alarm

(pp 300-27)



## Condenser Water Flow

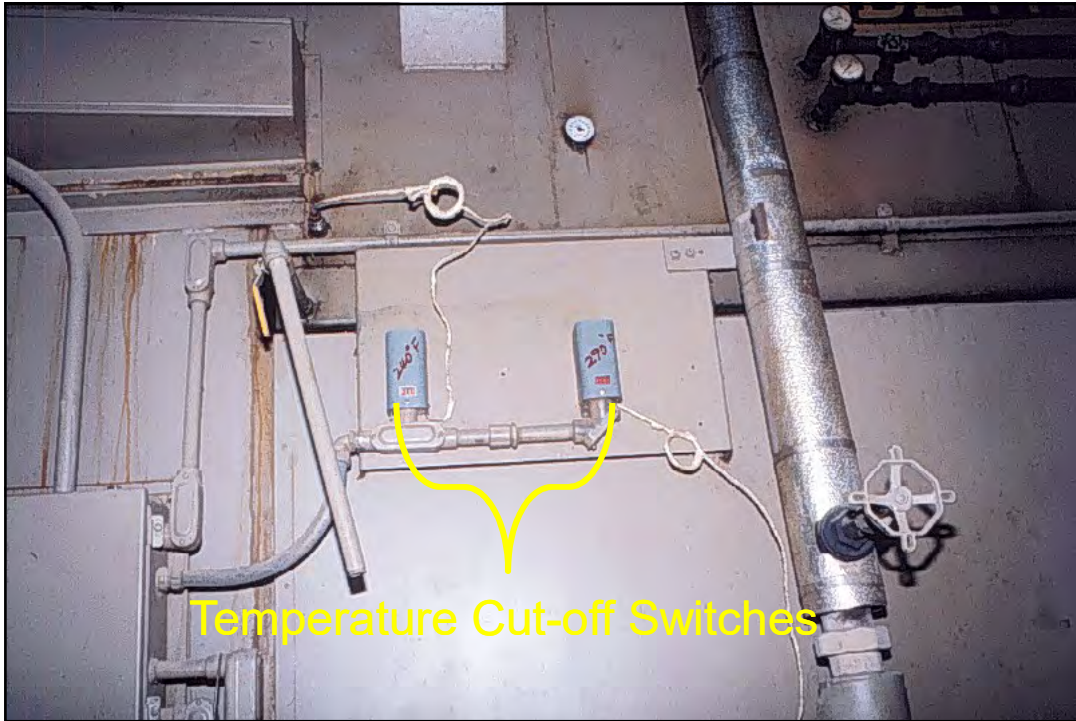
- Turns Off Sump Heat When:
  - The Condenser Water Stops Circulating
  - Or
  - The Condenser Water Becomes Warmer Than Specified
- Serve As Back-up For The Safety Vapor Thermostat

(pp 300-28)

## Temperature Cut-off Switch

- Cuts Off Heat When The Sump Temperature Rises Significantly Above The Solvents Boiling Point
- Prevents Decomposition Of Solvents
- Hydrochloric Acid May Be Formed If Solvent Level Becomes So Low It Touches Heating Element.

(pp 300-28)



## Carry - Out Emissions

- Results When Clean Parts Still Containing Liquid Or Vapors Are Extracted From The Degreaser
- Main Control Device: Simple Drainage
- Other Controls include:
  - Drying Tunnels
  - Rotating Baskets

(pp 300-28 & 29)

## Inspection Procedures

- Pre - Inspection
- Inspection
- Post - Inspection

## Pre - Inspection

- Facility History (File Review)
    - How Many Permits?
    - Compliance Status - Pending Actions?
  - Read Permit Conditions
    - Solvent Type
    - Solvent Usage Limits
    - Source Test Requirements?
  - Inspection Forms
    - Fill Out As Much As Possible Prior To Inspection
- (pp 400 - 1-3)



## Inspection



- Introduce Yourself To Facility Manager
  - Explain the reason you are there
- Tell Manager Of Any Assistance you May need
- Verify Number & Type Of Degreasers Present
- Review Solvent Usage Records
- Inspect Each Degreaser in use, if possible

(pp 400 - 3-5)

## Cold Cleaners

- Equipment Requirements
  - Check For Soundness (Leaks)
  - Check For Cover (when not in use)
  - Check For Changes In Freeboard
- Operational Requirements
  - Check Solvent Usage/Storage
  - Take Sample, If Necessary
  - Check Operation Parameters
  - Check Hoist Speed

(pp 400 - 6-8)

## Vapor Degreasers

- Equipment Requirements
  - See Cold Degreaser Req.
  - Check Control Device If Present
  - Check All Safety Switches
- Operating Requirements
  - See Cold Degreaser Req.
  - Parts Degreased In Vapor Zone
  - Water In The Water Separator
  - Check Operation Of Lip Exhaust

(pp 400 - 8-9)

## Conveyorized Degreasers

- Equipment Requirements
  - See Cold Degreaser Req.
  - Check To See That Hood Is Present
  - Look For Drying Tunnel, Rotating Basket, Or Tumbler
  - Check Silhouette
- Operational Requirements
  - See Cold Degreaser Req.

(pp 400 - 10)

## Air Pollution Control Points Of An Inspection

- Capture
- Transport
- Air Mover
- Instrumentation
- Control
- Subsystem



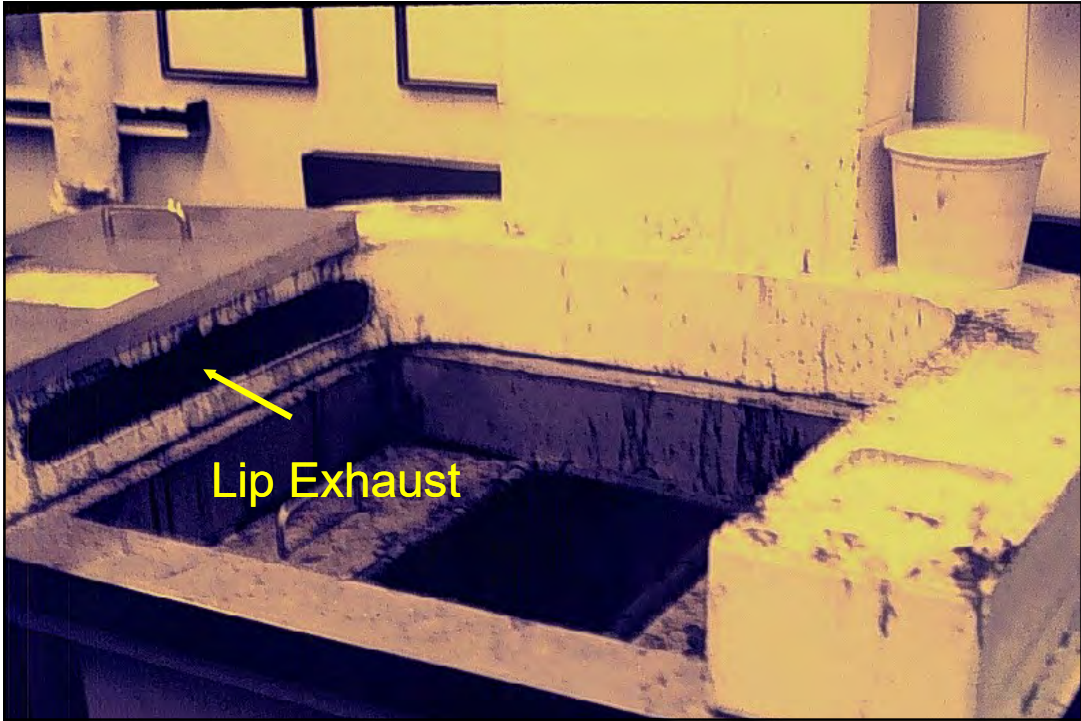
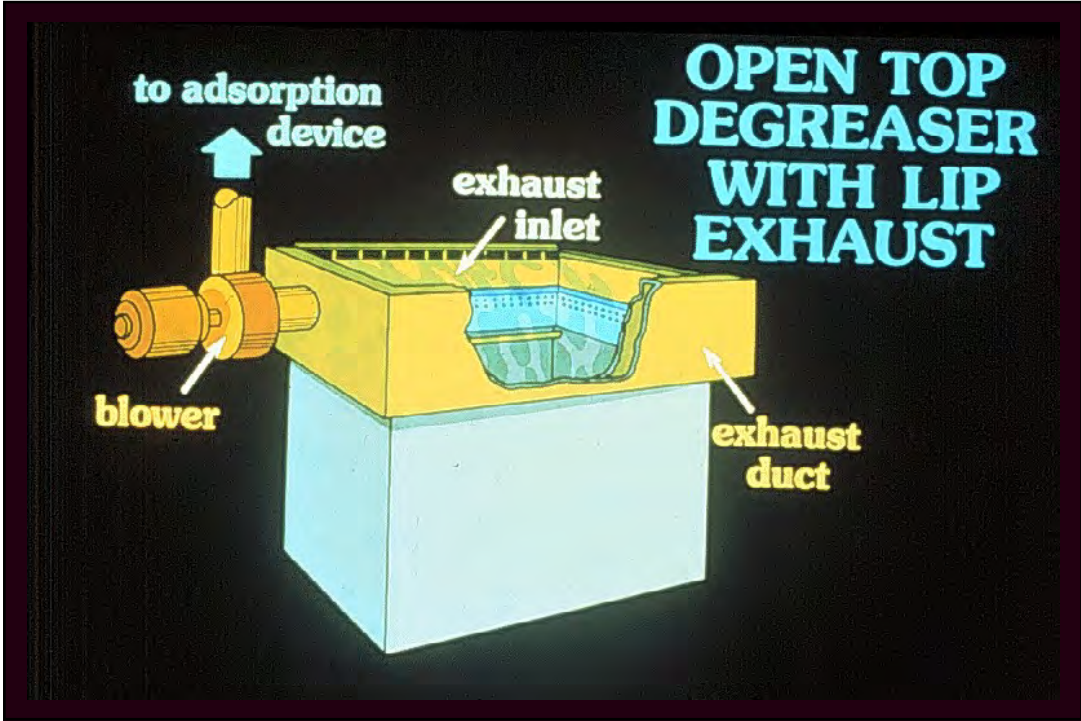
(pp 400-5)

## Capture

- Are Process Emissions Drawn into  
A Control Device At The Point Of Release
- (Are They Drawn Into A Collection Device)
- If Lip Exhaust Is Installed, Is It On?

(pp 400-5)





## Transport

- Are Emissions Moved To The Control Device Without Loss
- Are There Any Leaks

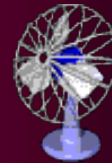
(pp 400-5)





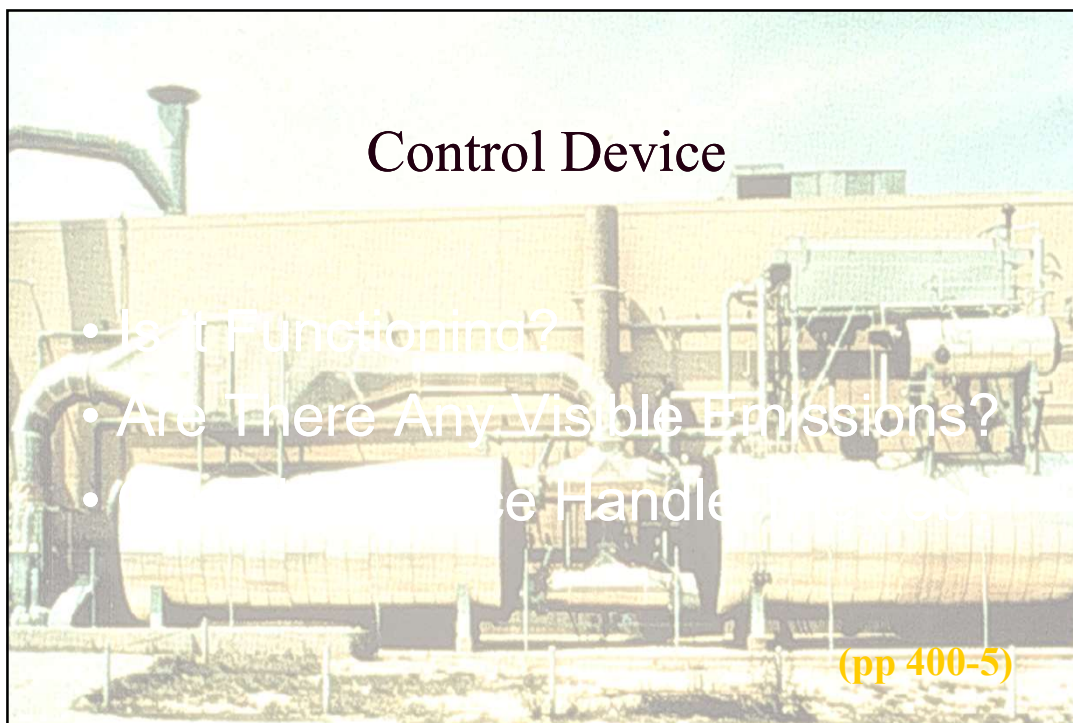
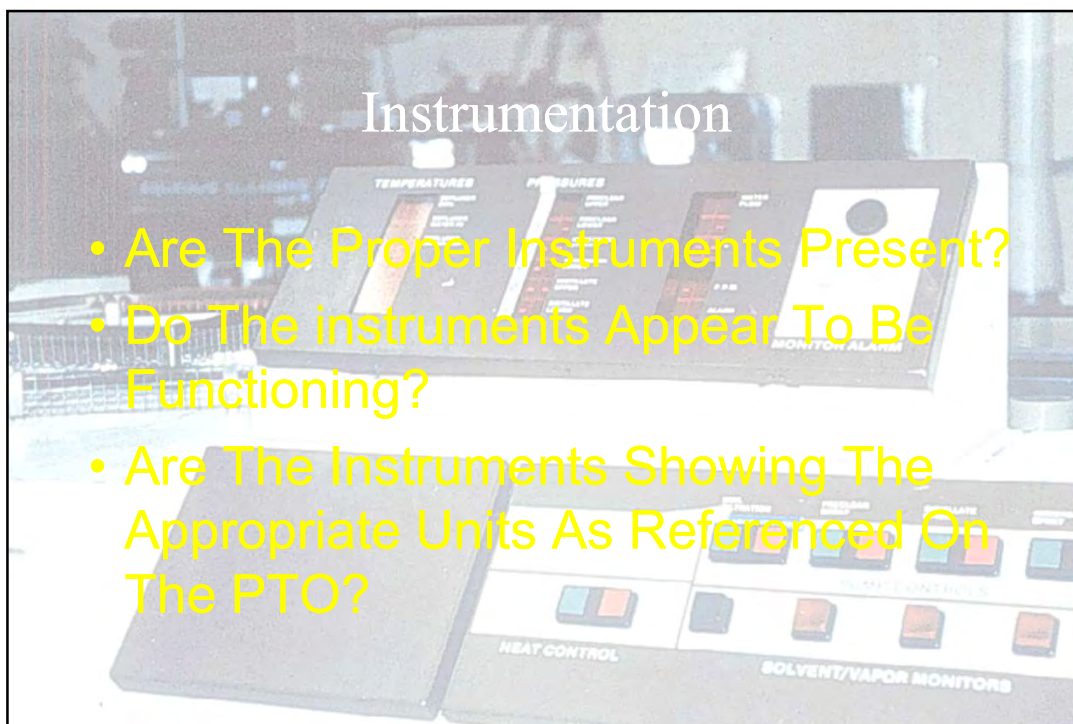
Ducting To Thermal  
Oxidizer On Roof

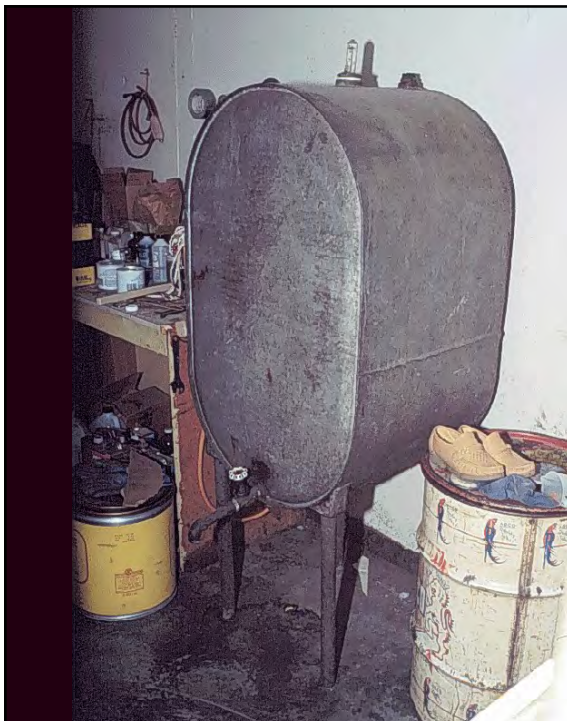
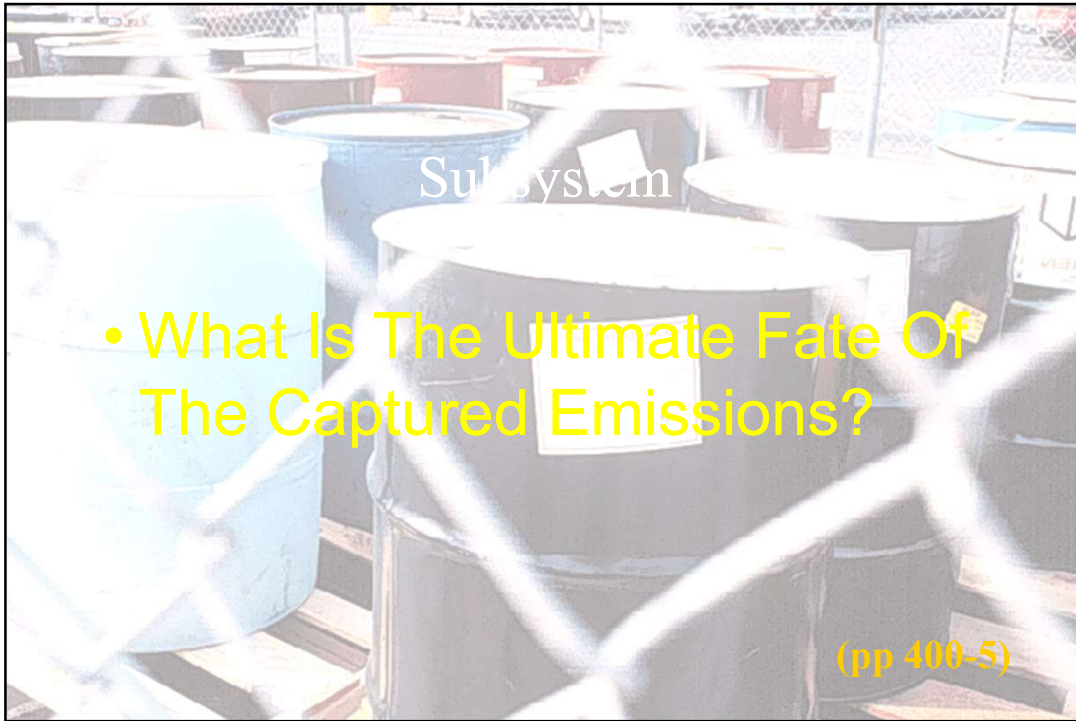
## Air Mover



- Is The Fan Big Enough For The Job?
- Is It Operating As Designed And Permitted?

(pp 400-5)





Solvent Waste Storage

## What About Violations?

- Notice To Comply (NTC)

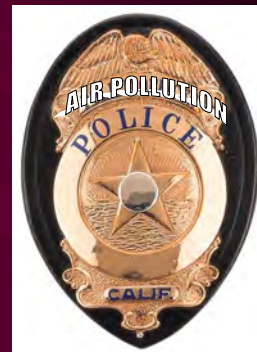
- Minor Deficiency
- Non-Emissions Related
- Non-Recurring



## What About Violations?

- Notice Of Violation (NOV)

- Emissions Related
- Same Problem As Last Inspection



## Reason To Issue An NTC

- Incomplete Records
- Minor Equipment Change Without Notifying The AQMD
- Some Records Missing  
(If Not Emissions Related)

## Reason To Issue An NOV

- Exceeded Permitted Solvent Usage Limit
- Missing Or Incomplete Information Necessary To Determine Compliance
- Open Container
- Control Equipment Malfunction
- Failed Source Test
- Same Violation As Their Last Inspection

## Four Options After An NOV

- Continue To Operate In Violation
- Cease The Noncompliant Activity
- Correct The Problem
- Apply For A Variance







**Post - Inspection**

Remember that You Have All The Information To Determine Compliance Before You Leave The Facility

- Explain Results To Facility Manager
- Follow-up On All Violations

**L**



**Rule Discussion**

- Exemptions
- Equipment Requirements
- Operating Requirements
- State BACT/RACT
- Federal NESHAPS/MACT

**(Sec 500)**

## Exemptions

- Grandfather Exemptions
- Source Category Exemption
- Size Exemptions
- Equipment Exemptions
- Process Exemptions

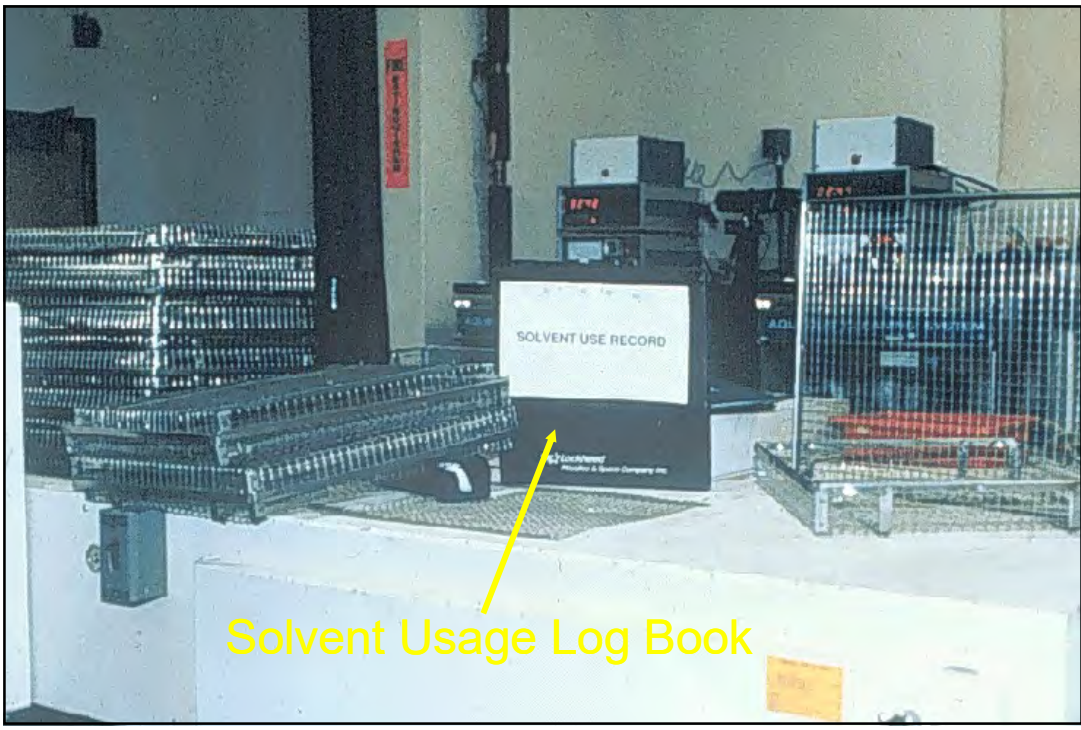
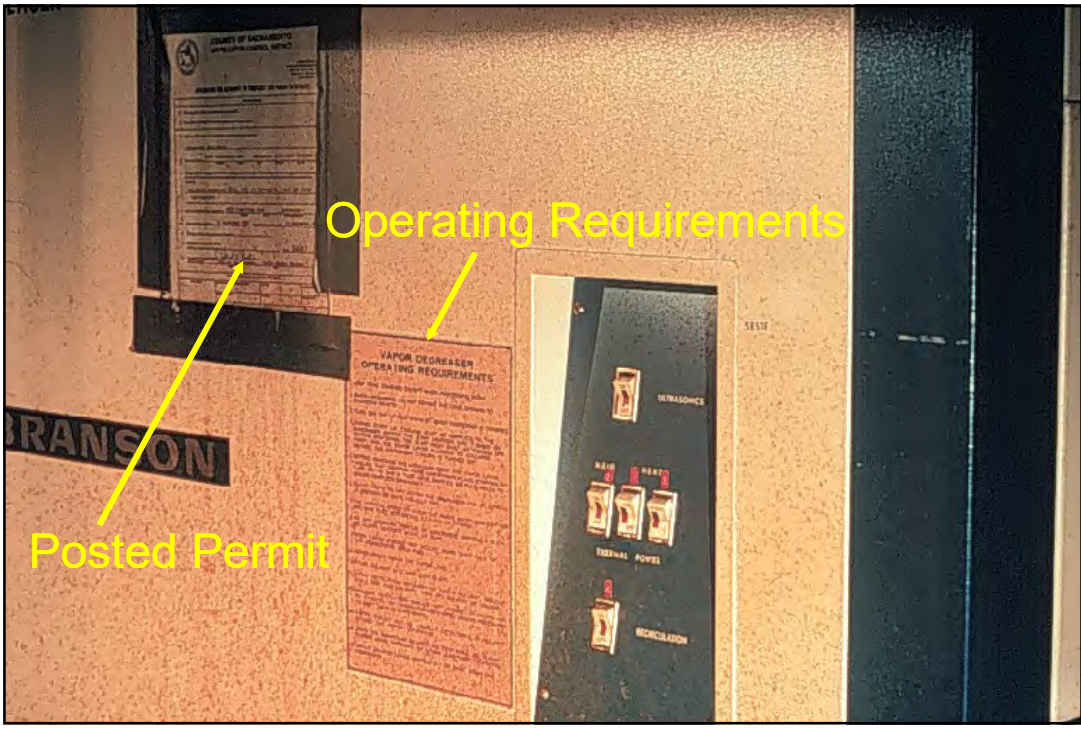
(Sec 500)

## Authority To Construct And Permit To Operate

- Specified Conditions
- Maintenance Program
- Monitoring And Records
- Rule Limitations/Violations
- Records Reporting
- Maintenance Logs
- Manuals For O & M



(pp 500-2 &3)



## General Requirements

- Operating Conditions
- Solvent Agitation
- Porous Material
- Hoist Speed
- Parts Dry
- Lip Exhaust



(Sec 500)

## Cold/Vapor Degreasers

- Container
- Cover
- Drag Out/Drying Rack
- Control Equipment
  - Freeboard Ratio
  - Refrigerated Freeboard Chiller
  - Carbon Adsorption
  - Other Control Methods



(Sec 500)

## Conveyorized Degreasers

- Hood
- Drying Tunnel
- Silhouetting

(Sec 500)



## Equipment Breakdown

- Typical Conditions
- Breakdown Records
- Breakdown Repair



## **CALIFORNIA RACT/BARCT**

- Covers All Types Of Cleaners
- Equipment Standards
- Operating Standards
- Prohibitions
- Exemptions

## **Federal NESHAPS/MACT For Halogenated Compounds (40 CFR 63 Subpart T)**

- Applicability
  - Exemptions
  - Standards
  - Tests, Recordkeeping & Reporting
- (Sec 500)**

## Halogenated Solvents, NESHAP Degreasing

### Applicability

- Sources (regardless of annual emissions) using:
  - Batch Cold Cleaning Machines
  - Batch Vapor Cleaning Machines
  - In-line Vapor Cleaning Machines Using:
    - Methyl Chloride
    - Trichloroethylene
    - Carbon Tetrachloride
    - Perchloroethylene
    - 1,1,1-trichloroethane
    - Chloroform

## Hal. Sol. NESHAP - Degreasing

### Exemptions

- Total concentration of one or more of the six solvents must exceed five percent by weight for the rule to apply
- Does not apply to hand wiping
- Contains 2 gallons or Less

## Hal. Sol. NESHAP - Degreasing

### Standards - Batch cold Cleaners

- Must use a tightly fitting lid that is kept closed except when loading or unloading, and a one inch layer of water on solvent surface; or
- Must use a tightly fitting lid that is kept closed except when loading or unloading and have a freeboard ratio of  $> 0.75$ ; or
- Remote reservoir machines must employ a tightly fitting lid over sump and lid must be kept closed except during parts cleaning

## Hal. Sol. NESHAP - Degreasing

### Standards - Batch cold Cleaners - work practices for control options 2 and 3

- **Collect & store waste solvent in closed containers;**
- **Flushing in freeboard area only;**
- **Drain cleaned parts for 15 seconds or until dripping stops, whichever is greater;**
- **Clean spills immediately;**
- **Store rags in covered container;**
- **Minimize solvent agitation to avoid splashing;**
- **Control room drafts when cover is open; and**
- **Cleaning of sponges, fabric, wood & paper products is prohibited.**



## Hal. Sol. NESHAP - Degreasing

Tests, Recordkeeping & Reporting  
Batch Cold Cleaning - One Time

- Initial compliance report stating required covers are free of holes, cracks or other emission impacting defects.

## Hal. Sol. NESHAP - Degreasing

Standards - Batch Vapor & In-line Vapor Cleaners  
Option 1 & 2 equipment design requirements

- Idling and downtime cover, or reduced room draft
- Freeboard ratio  $\geq 0.75$
- Automated parts handling with velocity  $\leq 11$  ft/Min
- Device to shut off sump heater if vapor level rises above primary condenser
- If lip exhaust is used, collected vapors must be routed to a carbon adsorber.

## Hal. Sol. NESHAP - Degreasing

### Standards - Batch Vapor & In-line Vapor Cleaners Work practice standards

- Maintain equipment as recommended by manufacturer
- Minimize air disturbances in the machine room
- Minimize air disturbances due to parts movement
- Minimize solvent loss due to spraying operations
- Reduce pooling of solvent on and in parts
- Follow proper startup and shutdown procedures
- Follow proper solvent transfer procedures
- Store waste solvent in a closed container
- Do not clean absorbent materials
- Be prepared to take and pass an operator test.

## Hal. Sol. NESHAP - Degreasing

### Standards - Batch Vapor Cleaners with Air/Solvent Interface of $\leq 13 \text{ ft}^2$ - Acceptable Control Options

0.045 lbs/hr ft<sup>2</sup> of solvent - air interface area or

- Working mode cover and freeboard ratio of 1.0 and superheated vapor
- Super heated vapor and freeboard refrigeration
- Working mode cover and freeboard refrigeration
- Refrigerated freeboard and reduced room draft
- Freeboard ratio of 1.0 and refrigerated freeboard
- Refrigerated freeboard and dwell
- Freeboard ratio of 1.0 and reduced room draft and dwell
- Refrigerated freeboard and carbon adsorber
- Freeboard ratio of 1.0 and super heated vapor and carbon adsorber

## Hal. Sol. NESHAP - Degreasing

### Standards - In Line Vapor Cleaners Acceptable Control Options

0.021 lbs/hr ft<sup>2</sup> of solvent - air interface area or

- If installed before August 29, 1995
  - Freeboard ratio of 1.0 and superheated vapor
  - Freeboard ratio of 1.0 and freeboard refrigeration
  - Freeboard refrigeration and dwell
  - Carbon adsorber and dwell
- If installed after August 29, 1995
  - Super heated vapor and refrigerated freeboard
  - Freeboard refrigeration and carbon adsorber
  - Super heated vapor and carbon adsorber.

## Hal. Sol. NESHAP - Degreasing

### Tests, Recordkeeping & Reporting

#### Batch Cold Cleaning

- Log of new solvents and discontinued solvents
- Calculations showing three month average monthly emission of less than 30.7 lbs per ft<sup>2</sup> per month

## Hal. Sol. NESHAP - Degreasing

### Tests, Recordkeeping & Reporting

#### In Line Cleaning

- Log of new solvents and discontinued solvents
- Calculations showing three month average monthly emission of less than
  - If installed before August 29, 1995
    - 31.4 lbs per ft<sup>2</sup> per month
  - If installed after August 29, 1995
    - 20 lbs per ft<sup>2</sup> per month