HALOGENATED SOLVENT DEGREASERS

COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 1030329 **DATE:** 9/7/2006 **ARRIVE:** 1:30PM **DEPART:** 2:30PM

FACILITY NAME: ASTRA PRODUCTS CO INC

FACILITY LOCATION: 3675 Tampa Road

OLDSMAR 34677

RESPONSIBLE OFFICIAL: STEVE LADONICZKI **PHONE:** (813)855-3021

CONTACT NAME: STEVE LADONICZKI **PHONE:** (

REMITTANCE YEAR: 2005 **ENTITLEMENT PERIOD:** 6/8/2006 (effective date) / 6/8/2011 (end date)

PART I: INSPECTION COMPLIANCE STATUS (check ☑ only one box)

☒ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE

PART II: NOTIFICATION – Rule 62-210.300 FAC

(check ☑ appropriate box(es))

1. Halogenated solvent used at facility:
   - perchloroethylene ---------- ☐
   - methylene chloride ---------- ☐
   - trichloroethylene ---------- ☒
   - 1,1,1-trichloroethane ------ ☐
   - carbon tetrachloride ------- ☐
   - chloroform ---------- ☐

2. Indication on notification form that facility has the following machine type(s).
   - Batch Vapor, x ≤ 1.21 m^2 ---------- ☒
   - Batch Vapor, x > 1.21 m^2 ---------- ☐
   - New In-line ---------- ☐
   - Existing In-line ---------- ☐
   - Batch Cold ---------- ☐

PART III: CLASSIFICATION – Rule 62-213.300 FAC

Indicate the machine type(s) observed at the facility:

Batch Vapor, x ≤ 1.21 m^2 --☒	New In-line ------ ☐	Batch Cold (immersion)-------- ☐
Batch Vapor, x > 1.21 m^2 --☐	Existing In-line --☐	Batch Cold (remote reservoir)--☐

PART IV: GENERAL CONTROL REQUIREMENTS – Rule 62-213.300 FAC

A. Batch Vapor and In-Line Machines

1. Does the facility maintain an idling and downtime mode cover that is readily opened and closed, that completely covers, has no cracks, holes, or defects; OR maintain a room designed with reduced draft according to Part II, Section (5)(c)6.b of the permit notification? ---------- ☒Yes ☐No

2. Does the facility maintain a freeboard ratio of 0.75 or greater? ---------- ☒Yes ☐No

3. Does the facility utilize a parts basket or parts whose size is less than 50% of the solvent-air interface area; OR introduce parts or parts basket at 0.9 m/min (3 ft/min) or less? ---------- ☒Yes ☐No

4. Does the facility conduct all spraying operations within the vapor zone or an area not directly exposed to ambient air? ---------- ☐Yes ☒No

5. Does the facility install and maintain an automated parts handling system capable of moving the parts/parts basket at 3.4 m/min. (11ft/min) or less? ---------- ☐Yes ☒No

6. Does the facility install and maintain a carbon adsorber on all machines using a lip exhaust? The exhaust concentration should not exceed 100 ppm halogenated solvent, the carbon adsorber should not be by-passed, the lip exhaust shall be located above the closed machine cover. ---- ☐Yes ☐No ☒N/A

7. Does the facility have each machine equipped with:
   a. a device to shut off sump heat if the solvent level drops to the heater coils? ---------- ☒Yes ☐No
   b. a device to shut off sump heat if the vapor level rises above the height of the vapor condenser? ---------- ☒Yes ☐N
   c. a primary condenser? ---------- ☒Yse ☐N

8. Does the facility store all waste solvent, still bottoms, and sump bottoms in closed containers? ---------- ☒Yes ☐No

B. Batch Cold Cleaning Machines

1. Does the facility collect and store all waste solvent in closed containers? ---------- ☐Yes ☒No
2. Does the facility use a flexible hose or flushing device only within the freeboard area? ---------- ☐Yes ☒No
3. Does the facility drain cleaned parts for 15 seconds or longer or until dripping ceases, whichever is longer? ---------- ☐Yes ☒No
4. Does the facility maintain the solvent level inside the machine at or below the fill line? ---------- ☐Yes ☒No
5. Does the facility immediately clean up spills during solvent transfer? Store wipe rags in a covered container? ---------- ☐Yes ☒No
6. Does the facility operate the agitator to produce a rolling motion? *(applicable only when air or pump agitated solvent bath used).* ---------- ☐Yes ☐No ☒N/A
7. Does the facility ensure that the machine is not exposed to drafts greater than 40 m/min (132 ft/min) when the cover is open? ---------- ☐Yes ☐No
8. Does the facility ensure that sponges, fabrics, wood and paper products are not placed in the machine? ---------- ☐Yes ☐No

Remote Reservoir Type Only

9. Does the facility employ a tightly fitting cover over the solvent sump? The cover must be closed at all times except during parts cleaning. ---------- ☐Yes ☐No ☒N/A

Immersion Type Only

10. Does the facility employ a tightly fitting cover and a water layer with a thickness of at least 2.5 cm (1 in.); OR employ a tightly fitting cover and maintain a freeboard ratio of 0.75? Tightly fitting cover must be closed at all times except during parts entry and removal. ---------- ☐Yes ☐No ☒N/A

PART V: PROCESS VENT CONTROLS – Rule 62-213.300 FAC *(not applicable to batch cold cleaning machines)*

Facility chose to meet requirements using:

control device combination / work practice standards ---------- ☐
alternative solvent emission limit *(proceed to Part VI)* ---------- ☒
idling emission limit / work practice standards *(proceed to Part VI)* ---------- ☐

A. Batch Vapor Machines, x ≤ 1.21 m^2

(Select control combination) — **DEVICE IN USE**

1.	☐g	working mode cover -- ☐	1.0 freeboard ratio - ☐	superheated vapor -------☐
2.	☐g	reduced room draft --- ☐	1.0 freeboard ratio - ☐	superheated vapor -------☐
3.	☐g	reduced room draft --- ☐	1.0 freeboard ratio - ☐	dwell ----------☐
4.	☐g	freeboard refrig. device☐	superheated vapor -- ☐	
5.	☐g	freeboard refrig. device☐	working mode cover ☐	
6.	☐g	freeboard refrig. device☐	reduced room draft ☐	
7.	☐g	freeboard refrig. device☐	1.0 freeboard ratio - ☐	
8.	☐g	freeboard refrig. device☐	dwell ---------- ☐	
9.	☐g	freeboard refrig. device☐	carbon adsorber ---- ☐	
10.	☐g	carbon adsorber ------- ☐	1.0 freeboard ratio - ☐	superheated vapor ------ ☐

B. Batch Vapor Machines, x > 1.21 m^2

(Select control combination) — **DEVICE IN USE**

1.	☐g	freeboard refrig. device☐	superheated vapor -- ☐	1.0 freeboard ratio ------ ☐
2.	☐g	freeboard refrig. device☐	superheated vapor -- ☐	working mode cover --- ☐
3.	☐g	freeboard refrig. device☐	superheated vapor -- ☐	reduced room draft ----- ☐
4.	☐g	freeboard refrig. device☐	superheated vapor -- ☐	carbon adsorber --------- ☐
5.	☐g	freeboard refrig. device☐	reduced room draft - ☐	dwell ----------☐
6.	☐g	freeboard refrig. device☐	reduced room draft - ☐	1.0 freeboard ratio ------ ☐
7.	☐g	1.0 freeboard ratio ☐	reduced room draft - ☐	superheated vapor ------ ☐

C. Existing In-Line Machines

(Select control combination) — **DEVICE IN USE**

1.	☐g	freeboard refrig. device☐	1.0 freeboard ratio - ☐
2.	☐g	superheated vapor ---- ☐	1.0 freeboard ratio - ☐
3.	☐g	freeboard refrig. device☐	dwell ---------- ☐
4.	☐g	carbon adsorber ------- ☐	dwell ---------- ☐

D. New In-Line Machines

(Select control combination) — **DEVICE IN USE**

☐	freeboard refrig. device☐	superheated vapor - ☐
☐	freeboard refrig. device☐	carbon adsorber ---- ☐
☐	superheated vapor ----- ☐	carbon adsorber ---- ☐

PART VI: RECORDKEEPING REQUIREMENTS – Rule 62-213.300(3) FAC

Has the responsible official maintained the following:

1. Owner's manuals, design specifications, and other instructional materials for cleaning machine and control equipment? ----------	☒Yes	☐No	
2. Date of installation for cleaning machine and all control devices? If the exact date is unknown, they must have a letter stating installation occurred before or after 11/29/93. -----	☒Yes	☐No	
3. Halogenated solvent content for each solvent used? *(exempt if <5% by weight)* ----------	☒Yes	☐No	
4. Estimates of annual solvent consumption for each machine? ----------	☒Yes	☐No	
5. Dates of solvent additions and amounts added to each machine? *(applicable only to those using an alternative emission limit)* ----------	☒Yes	☐No	☐N/A
6. Idling emissions limit tests, including values obtained during the initial performance test? *(applicable only to those using an idling emissions limit)* ----------	☐Yes	☐No	☒N/A
7. All control device and parameter monitoring? *(applicable only to batch vapor and in-line machines)* ----------	☐Yes	☐No	☒N/A
8. Information on remedial actions in the event of exceedances or other repairs and subsequent monitoring of affected parameters? ----------	☐Yes	☐No	☒N/A
9. Monthly emissions calculations *(applicable only to those using an alternative or idling emission limit)* ----------	☒Yes	☐No	☐N/A
10. 3-month rolling average emissions calculations? *(applicable only to those using an alternative emission limit)* ----------	☒Yes	☐No	☐N/A
11. Cleaning capacity calculations? *(applicable only to those using an alternative emission limit without a solvent-air interface)* ----------	☐Yes	☐No	☒N/A

SHEA JACKSON — Inspector's Name (Please Print)

9/7/2006 — Date of Inspection

Inspector's Signature

9/1/2007 — Approximate Date of Next Inspection

COMMENTS: During the inspection of the facility, I met with the responsible official, Steve Ladoniczki.

- We reviewed the records from July 2005 through September 7, 2006. There had been no exceedances of the emission limit of 30.7lbs/ft2/month. The highest 3- month rolling average observed was 18.3lbs/ft2 for the month of August 2005.
- During the tour of the facility, I observed the cleaning of circuit boards with isopropyl alcohol; the parts are taped and prepared for dipping in the trichloroethylene tank. They use the isopropyl alcohol, for pre-cleaning. The tank is used for ~ 1 hour per day. The unit is pre-heated for ½ hour. The parts are lowered down into the vapor zone area. The parts are allowed to form condensation that dissolves off the impurities. This takes about 30 seconds, and then when dripping has stopped the part is raised above vapor are. The part dries whiles still inside the tank chiller area before it is removed entirely from tank. Two small rectangular parts baskets are use, which are the same size as tank dimensions observed for the dipping of parts. There was no processing at the time of the inspection. (See Photo)
- The tank was covered; there is no spraying of solvent done for parts cleaning operation. The tank has automatic safety shutoffs to prevent overheating of solution.
- The facility has a spray booth, but is locked and used for storage. The facility is looking to sale booth. The facility is also reducing its warehouse area was under renovation for leasing out to another facility. (See photos)
- There is a hood area used for the coating of some parts with a polyethylene acrylic clear coat. The usage is approximately ½ gallon / month.
- I discussed P 2 with Mr. Ladoniczki, in regards to Pollution Prevention practices and possible use of alternatives to Trichloroethylene usage. I handed out P2 pamphlets. He stated they had not found there to be a substitute for the government contracts. The levels of usage were lower then the previous year. Mr. Ladoniczki, stated they were using a water base, no cleaning solder. He stated this and making sure they minimized tank operation time, has helped reduce Trichloroethylene usage. The August - 3 month rolling average was 6.03. This last years highest 3- month total was 28.29, compared to this years highest was 18.3 for the 3- month average.
- The facility records and Halogenated degreasing operations were in compliance at this time. The facility had completed and sent in permit renewal and permit expiration date is now 06/07/11.