



### PART III: GENERAL CONTROL REQUIREMENTS

#### A. Batch Vapor and In-Line Machines Does the facility:

1. 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? :Y ☐N
2. Maintain a freeboard ratio of 0.75 or greater? :Y ☐N
3. 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/sec) or less? :Y ☐N
4. Conduct all spraying operations within the vapor zone or an area not directly exposed to air? ☐Y :N/A
5. Install and maintain an automated parts handling system capable of moving the parts/parts basket at 3.4 m/min. (11ft/min) or less? ☐Y :N/A
6. 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. ☐Y ☐N :N/A
7. Have each machine equipped with --
  - a. a device to shut off sump heat if the solvent level drops to the heater coils? : Y ☐N
  - b. a device to shut off sump heat if the vapor level rises above the height of the vapor condenser? : Y ☐N
  - c. a primary condenser? : Y ☐N
8. Store all waste solvent, still bottoms, and sump bottoms in closed containers? : Y ☐N

#### B. Batch Cold Cleaning Machines :N/A

Does the facility:

1. Collect and store all waste solvent in closed containers? ☐Y ☐N :N/A
2. Use a flexible hose or flushing device only within the freeboard area? ☐Y ☐N :N/A
3. Drain cleaned parts for 15 seconds or longer or until dripping ceases, whichever is longer? ☐Y ☐N :N/A
4. Maintain the solvent level inside the machine at or below the fill line? ☐Y ☐N :N/A
5. Immediately clean up spills during solvent transfer? Store wipes rags in a covered container? ☐Y ☐N :N/A
6. Operate the agitator to produce a rolling motion? (*Applicable only when air- or pump-agitated solvent bath used*) ☐Y ☐N :N/A
7. Ensure that the machine is not exposed to drafts greater than 40 m/min (132 ft/min) when the cover is open? ☐Y ☐N :N/A
8. Ensure that sponges, fabrics, wood and paper products are not placed in the machine? ☐Y ☐N :N/A

Remote Reservoir Type Only --

9. Employ a tightly fitting cover over the solvent sump? The cover must be closed at all times except during parts cleaning. ☐Y ☐N :N/A

Immersion Type Only --

10. 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. ☐Y ☐N :N/A

**PART IV: PROCESS VENT CONTROLS** (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 V*)
- ☐ idling emission limit / work practice standards (*proceed to Part V*)

**A. Batch Vapor Machines,  $x \leq 1.21 \text{ m}^2$** 

control comb.

selected

In use

- |   |  |
|---|--|
| <input type="checkbox"/> working mode cover / 1.0 freeboard ratio / superheated vapor | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> reduced room draft / 1.0 freeboard ratio / superheated vapor | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> reduced room draft / 1.0 freeboard ratio / dwell             | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> freeboard refrig. device / superheated vapor                 | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> freeboard refrig. device / working mode cover                | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> freeboard refrig. device / reduced room draft                | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> freeboard refrig. device / 1.0 freeboard ratio               | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> freeboard refrig. device / dwell                             | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> freeboard refrig. device / carbon adsorber                   | <input type="checkbox"/> <input type="checkbox"/> :N/A |
| <input type="checkbox"/> carbon adsorber / 1.0 freeboard ratio / superheated vapor    | <input type="checkbox"/> <input type="checkbox"/> :N/A |

**B. Batch Vapor Machines,  $x > 1.21 \text{ m}^2$** 

control comb.

selected

In use

- |  |  |
|--|--|
| <input type="checkbox"/> freeboard refrig. device / superheated vapor / 1.0 freeboard ratio  | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <input type="checkbox"/> freeboard refrig. device / superheated vapor / working mode cover   | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <input type="checkbox"/> freeboard refrig. device / superheated vapor / reduced room draft   | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <input type="checkbox"/> freeboard refrig. device / superheated vapor / carbon adsorber      | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <input type="checkbox"/> freeboard refrig. device / reduced room draft / dwell               | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <input type="checkbox"/> freeboard refrig. device / reduced room draft / 1.0 freeboard ratio | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <input type="checkbox"/> 1.0 freeboard ratio / reduced room draft / superheated vapor        | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |

**C. Existing In-Line Machines**

control comb.

selected

In use

- |   |      |
|---|------|
| <input type="checkbox"/> freeboard refrig. device / 1.0 freeboard ratio | :N/A |
| <input type="checkbox"/> superheated vapor / 1.0 freeboard ratio        | :N/A |
| <input type="checkbox"/> freeboard refrig. device / dwell               | :N/A |
| <input type="checkbox"/> carbon adsorber / dwell                        | :N/A |

**D. New In-Line Machines**

control comb.

selected

In use

- |   |      |
|---|------|
| <input type="checkbox"/> freeboard refrig. device / superheated vapor | :N/A |
| <input type="checkbox"/> freeboard refrig. device / carbon adsorber   | :N/A |



superheated vapor / carbon adsorber

:N/A



## PART V: RECORDKEEPING REQUIREMENTS

### Has the responsible official maintained the following:

1. Owner's manuals, design specifications, and other instructional materials for cleaning machine and control equipment? :Y ☐N
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. :Y ☐N
3. Halogenated solvent content for each solvent used? (*exempt if <5% by weight*) :Y ☐N
4. Estimates of annual solvent consumption for each machine? :Y ☐N
5. Dates of solvent additions and amounts added to each machine? (*applicable only to those using an alternative emission limit*) :Y ☐N ☐N/A
6. Idling emissions limit tests, including values obtained during the initial performance test? (*applicable only to those using an idling emissions limit*) ☐Y ☐N :N/A
7. All control device and parameter monitoring? (*applicable only to batch vapor and in-line machines*) ☐Y ☐N :N/A
8. Information on remedial actions in the event of exceedances or other repairs and subsequent monitoring of affected parameters? ☐Y ☐N :N/A
9. Monthly emissions calculations (*applicable only to those using an alternative or idling emission limit*) :Y ☐N ☐N/A
10. 3-month rolling average emissions calculations? (*applicable only to those using an alternative emission limit*) :Y ☐N ☐N/A
11. Cleaning capacity calculations? (*applicable only to those using an alternative emission limit without a solvent-air interface*) :Y ☐N ☐N/A

## PART VI: ADDITIONAL SITE INFORMATION

- During the inspection of the facility, I met with the responsible official, Mr. Steve Ladoniczki.
- I reviewed the records from November 2007 through October 2008. The highest 3- month rolling average observed was 12.62 lbs/ft<sup>2</sup> for the month of October 2008. The facility has been using the tank less, and the lowest range was 4.73 lbs/ft<sup>2</sup> in April 2008. There have been no exceedance of the emission limit of 30.7lbs/ft<sup>2</sup>/month. The levels of usage continue to be slightly lower then the previous year. Mr. Ladoniczki, stated they continue to minimized tank operation time.
- I suggested to Mr. Ladoniczki, that he could maybe substitute an alternative to Trichloroethylene usage the Simsolv product for his tank. I informed him it could reduce his time recordkeeping, etc permit requirements, and possibility lower waste expense. I suggested he contact a facility that had eliminated their product and review the pro and cons with them. I gave him the other facility name for future contact. I told him if he wants to trial then eliminate can rescind permit if it works for his facility.
- During the tour of the facility, I observed the facility continues to uses isopropyl alcohol for the pre cleaning of circuit boards before submersion in the degreasing tank. There was an area for metal work and drills for use on parts. The facility spray booth is still locked and used for storage. The facility uses another hood area used for the coating of some circuit boards and parts with a polyethylene acrylic clear coat. The usage is approximately 1 - 2 gallon / month at this time. (See photo)
- I observed the tank it was closed and covered; there is no spraying of solvent done for parts cleaning operation. The tank has automatic safety shutoffs to prevent overheating of solution.
- The unit is pre-heated for ½ hour. The parts are taped and prepared and dipped in the trichloroethylene tank. The tank is used for ~ 1 – 2 hour per day. The parts are lowered down into the vapor zone area. The parts form condensation that dissolves off the impurities on the part. This typically takes about 30 seconds, and then the part is raised above vapor area. The part dries whiles still inside the tank chiller area before it is removed entirely from tank. The facility has two small rectangular parts baskets are use, which are the same size as tank dimensions observed for the dipping of parts. (See Photo)
- The tank now has another cooler, the previous one broke down ~ 4 months ago. Mr. Ladoniczki stated this is for the evaporator system. It is a NESLAB CFT -3 refrigerator recirculation. The temperature is maintained at 7°C during tank operation. (See photo)
- I reminded Mr. Ladoniczki, that the semi annual and annual solvent reports would be coming due again in 1/30/2008. I advised him to get them in on time.
- The facility records and Halogenated degreasing operations were in compliance at this time. (See copies in file)

Shea Jackson

November 5, 2008

Inspector's Name

Date of Inspection

Inspector's Signature

2009  
Approximate Date of Next Inspection

**Astra Products Co.,Inc.**  
3675 Tampa Road, Oldsmar



**Project Id:** 66826      **Permit No:** 1030329-003-AG      **Arms Number:** 0329

**Inspector:** Shea Jackson      **Inspection Date / Time:** 11/5/08

**Source (EU):**      Existing, Halogenated Solvent Degreasing: Consists of one batch vapor degreaser, purchased on 9/28/85, with a solvent-air interface area of <1.21 m2.

Facility uses 1,1,1-trichlorethane

**Description:** *This is looking at the blue degreasing tank with parts basket on top. The tank was not in operation at this time. The new cooling NESLAB refrigeration unit is the beige device with temperature gauge on left. This is for the evaporation system of the tank to cool down to 7° C.*



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**Description:** *This is the hood and area where the circuit boards are sprayed with the polyethylene acrylic clear coat and allowed to dry.*