HALOGENATED SOLVENT DEGREASERS
TITLE V GENERAL PERMIT
COMPLIANCE INSPECTION CHECKLIST

TYPE OF INSPECTION: ANNUAL (INS1, INS2) : COMPLAINT/DISCOVERY (CI) ❑

RE-INSPECTION (FUI) ❑ ARMS COMPLAINT NO._____

AIRS ID#: 1030329 **DATE:** **10/6/2010** **TIME IN:** **2:00PM** **TIME OUT:** **2:40PM**

FACILITY NAME: **Astra Products Co., Inc.**

FACILITY LOCATION: 3675 Tampa Road

Oldsmar, FL 34677

RESPONSIBLE OFFICIAL : **Steve T. Ladoniczki** **PHONE:** 813-855-3021

CONTACT NAME: Steve Ladoniczki **PHONE:** 813-855-3021

PART I: NOTIFICATION

(check appropriate box) **Facility Compliance Status**: IN :

1. New facility notified DARM 30 days prior to startup : (ARMS Data) MNC ❑
2. Facility failed to notify DARM to use general permit ❑ SNC ❑
3. Halogenated solvent used at facility:

perchlorethylene	❑	methylene chloride	❑
trichloroethylene	:	1,1,1-trichloroethane	❑
carbon tetrachloride	❑	chloroform	❑

4. Facility indicated on notification form that it has the following machine type(s). Check more than one box if applicable:

Batch Vapor, $x \leq 1.21\ m^2$	:	New In-line	❑	Batch Cold	❑
Batch Vapor, $x > 1.21\ m^2$	❑	Existing In-line	❑		

PART II: CLASSIFICATION

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

Batch Vapor, $x \leq 1.21\ m^2$	:	New In-line	❑	Batch Cold (immersion)	❑
Batch Vapor, $x > 1.21\ m^2$	❑	Existing In-line	❑	Batch Cold (remote reservoir)	❑

PART 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 ambient 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 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 fre[illegible] ❑Y ❑N ⁚ N/A
3. Drain cleaned parts for 15 seconds or longe[illegible] or until drippi[illegible]ases [illegible]r is longer? ❑Y ❑N ⁚ N/A
4. Maintain the solvent level [illegible]hi[illegible] below the [illegible]e? ❑Y ❑N ⁚ N/A
5. Immediately clean up spills du[illegible]ve[illegible]tore wipe rags in a covered container? ❑Y ❑N ⁚ N/A
6. Operate the agitator to produce a ro[illegible]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 ≤ 1.21 m^2

control comb. selected		In use			
❑	working mode cover / 1.0 freeboard ratio / superheated vapor	❑	❑	❑	⁚ N/A
❑	reduced room draft / 1.0 freeboard ratio / superheated vapor	❑	❑	❑	
❑	reduced room draft / 1.0 freeboard ratio / dwell	❑	❑	❑	
❑	freeboard refrig. device / superheated vapor	❑	❑		
❑	freeboard refrig. device / working mode cover	❑	❑		
❑	freeboard refrig. device / reduced room draft	❑	❑		
❑	freeboard refrig. device / 1.0 [illegible]rd ratio	❑	❑		
❑	freeboard refrig. [illegible] / dwell	❑	❑		
❑	freeboard refrig. [illegible]	❑	❑		
❑	carbon adsorber / 1.[illegible]oard [illegible]eated vapor	❑	❑	❑	

B. Batch Vapor Machines, x > 1.21 [illegible]

control comb. selected		In use			
❑	freeboard refrig. device / superheated vapor / 1.0 freeboard ratio	❑	❑	❑	⁚ N/A
❑	freeboard refrig. device / superheated vapor / working mode cover	❑	❑	❑	
❑	freeboard refrig. device / superheated vapor / reduced room draft	❑	❑	❑	
❑	freeboard refrig. device / superheated vapor / carbon adsorber	❑	❑	❑	
❑	freeboard refrig. device / reduced room draft / dwell	❑	❑	❑	
❑	freeboard refrig. device / reduced room draft / 1.0 freeboard ratio	❑	❑	❑	

❑ 1.0 freeboard ratio / reduced room draft / superheated vapor ❑ ❑ ❑

C. Existing In-Line Machines

control comb. selected		In use		
❑	freeboard refrig. device / 1.0 freeboard ratio	❑	❑	❑ : N/A
❑	superheated vapor / 1.0 freeboard ratio	❑		❑
❑	freeboard refrig. device / dwell			
❑	carbon adsorber / dwell			

D. New In-Line Machines

control comb. selected		In u		
❑	freeboard refrig. d r	❑	❑	: N/A
❑	freeboard refrig. devi on adso	❑	❑	
❑	superheated vapor / carb rber	❑	❑	

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

- *I met with the responsible official, Mr. Steve Ladoniczki for the inspection of the facility.*
- *I reviewed the records from October 2009 through September 2010. The highest 3- month rolling average observed was 11.03 lbs/ft^2 for the month of September 2010. October 2009 the level was at 6.31 lbs/ft^2. The usage levels continue to be lower. Mr. Ladoniczki stated there is less military jobs. Commercial. They lost one of their contracts with Goodrich Aerodynamics.*
- *Mr. Ladoniczki, stated they continue to minimize tank operation time. He stated the tank is turned on only for the time when being used for the day. The employees turn on and allow warming up ½ hour and then they turn off when done.*
- *I observed the facility uses isopropyl alcohol for the pre cleaning of circuit boards before submersion in the degreasing tank.*
- *There is an area for metal work and drills for use on parts. The facility spray booth is used for storage of miscellaneous items.*
- *The facility uses a small hood area for the coating of some circuit boards and parts with a polyethylene acrylic clear coat. The usage is approximately 1 - 2 gallon / month.*
- *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 parts are taped and prepared and dipped in the trichloroethylene tank. 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. The tank now has an evaporator system. It is a NESLAB CFT -3 refrigerator recirculation. The temperature is maintained at 7^{o}C during tank operation. (See photo)*
- *Mr. Ladoniczki, submitted the semi annual reports for 2010*
- *I gave Mr. Ladoniczki the P2 phamplet and the P2 Halogenated degreaser handout.*
- *Mr. Ladoniczki, has not decided to substitute an alternative to Trichloroethylene usage for his tank. He said that they were using less and Less and may not need to use the trichloroethylene eventually.*
- *There have been no exceedances of the emission limit of 30.7lbs/ft^2/month. The facility Halogenated degreasing operations were in compliance at this time.*

October 6, 2010

Shea Jackson
Inspector's Name

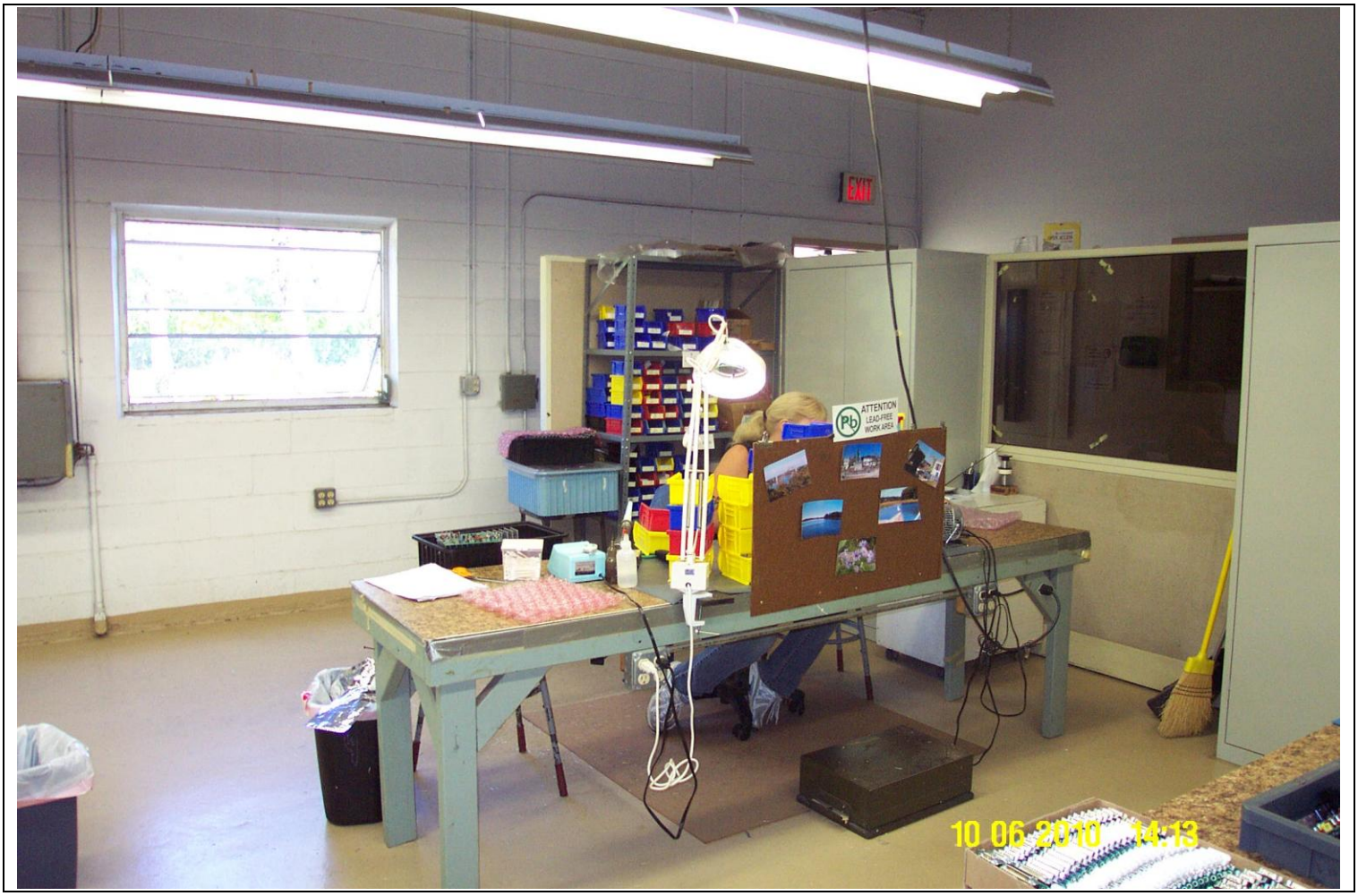
Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

Astra Products Co., Inc.

3675 Tampa Road, Oldsmar



Project Id: 75673 **Permit No:** 1030329-003-AG **Arms Number:**

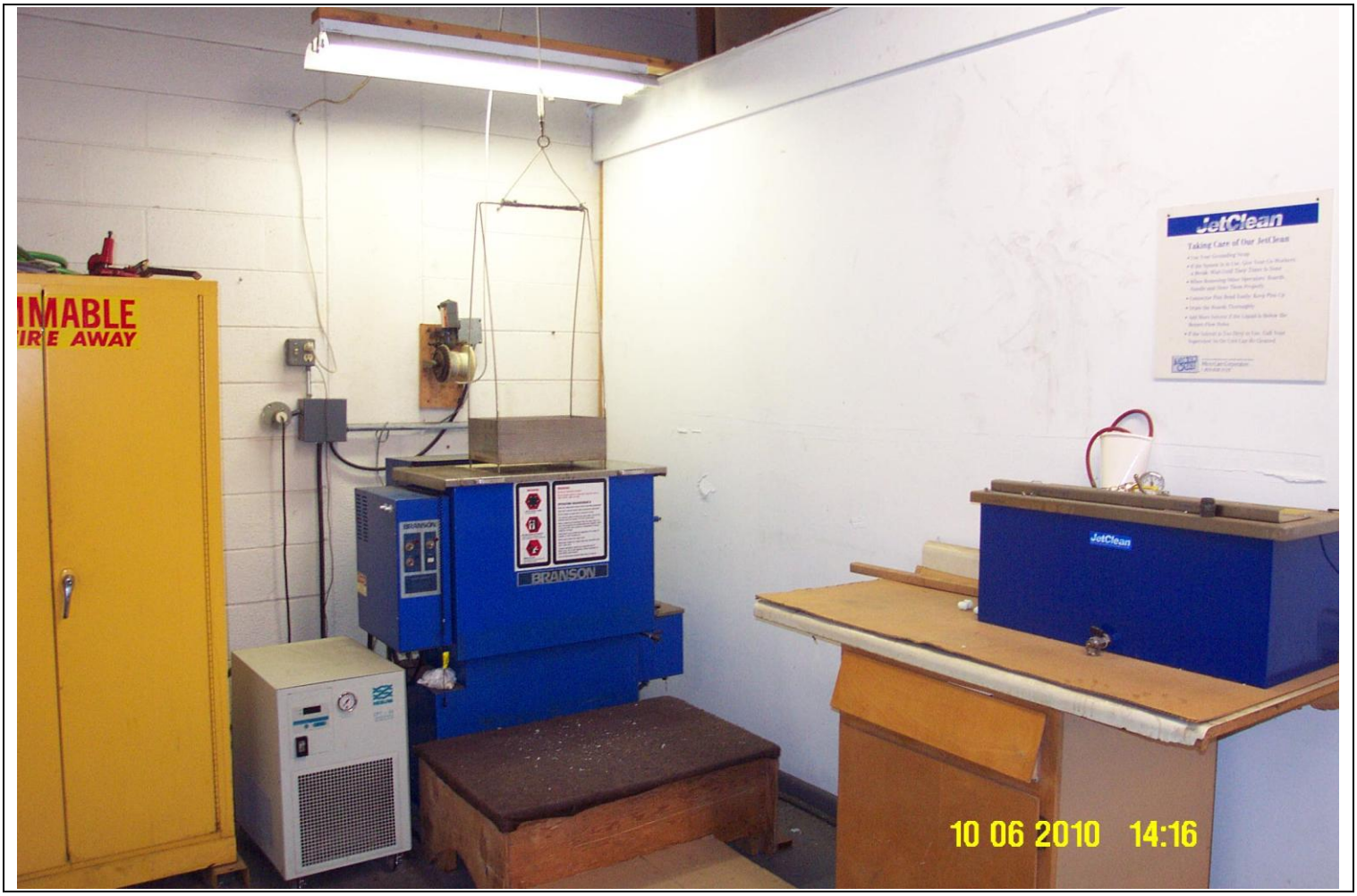
Inspector: Shea Jackson **Inspection Date / Time:** 10/6/2010 / _____

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:	[The facility assembles circuit boards and various equipment for military and other contractors]

Astra Products Co., Inc.

3675 Tampa Road, Oldsmar



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Description: [This is the tank where parts are dipped in Trichlorethane for parts cleaning. It is turned on only for use and shut off when done.]

Astra Products Co., Inc.

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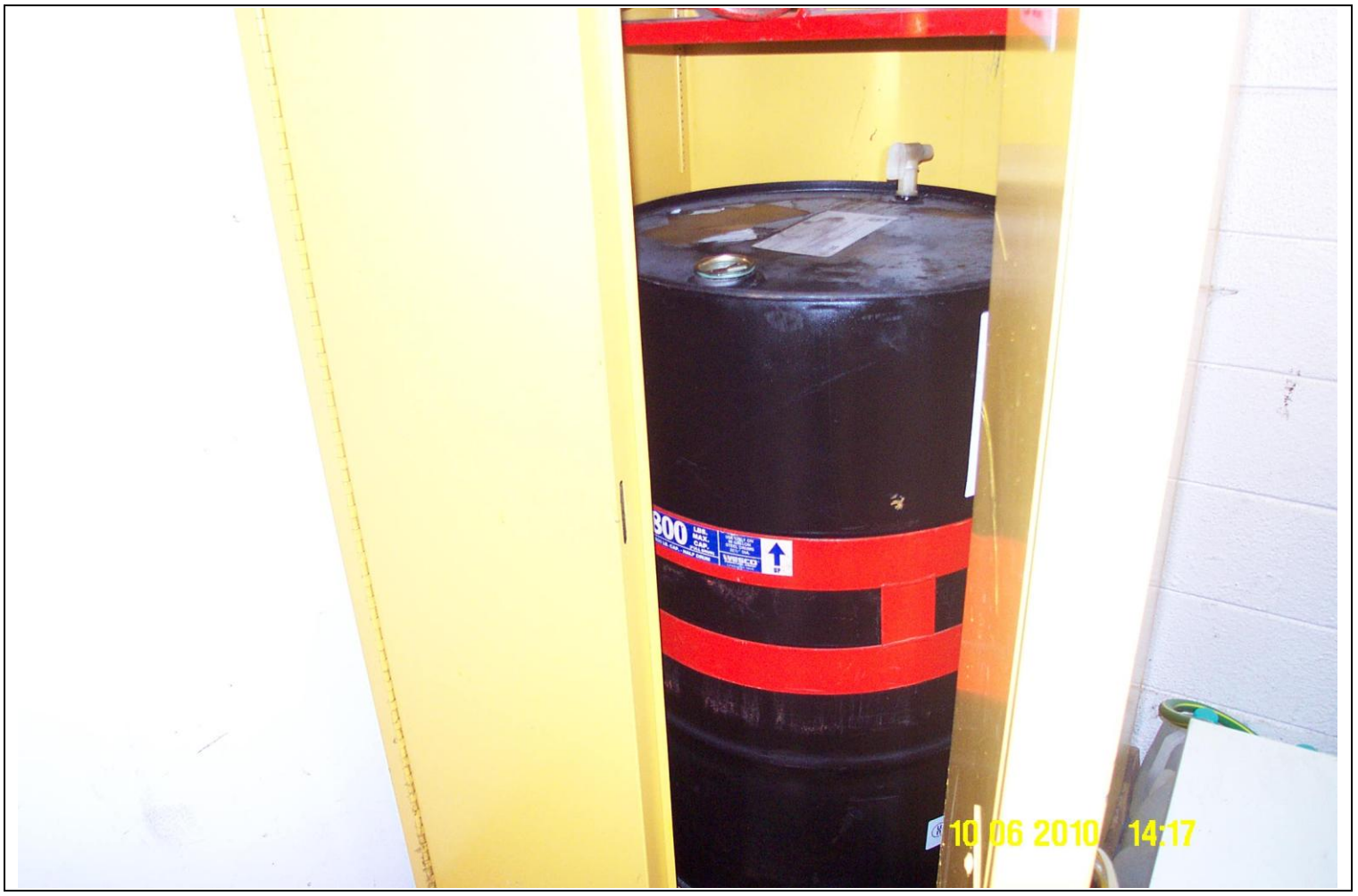

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Description:	[The trichlorethane is stored in fireproof cabinet]

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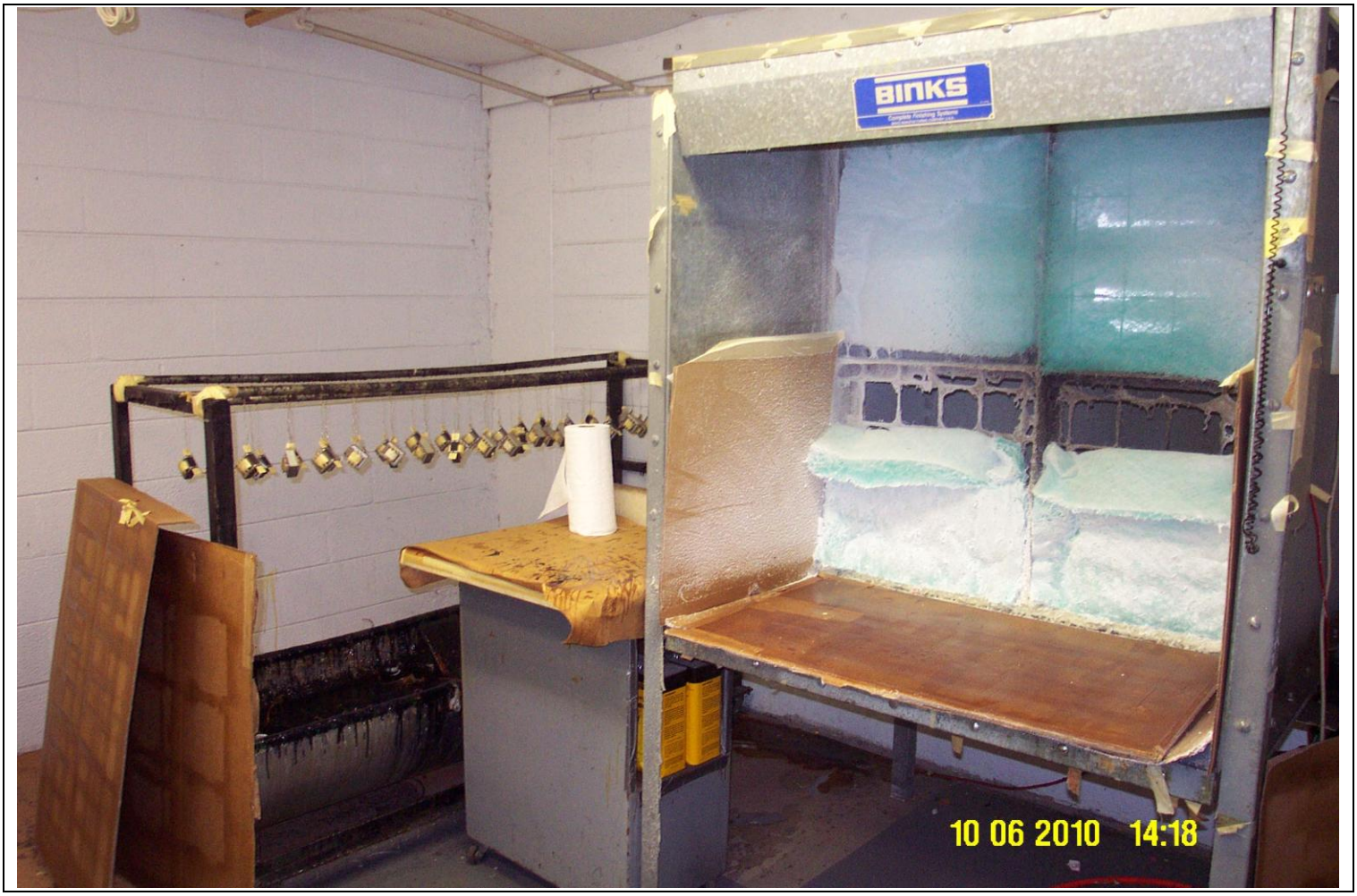

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Description:	[This hood is used for the spraying of small parts, the parts are dipped in a varnish coating]

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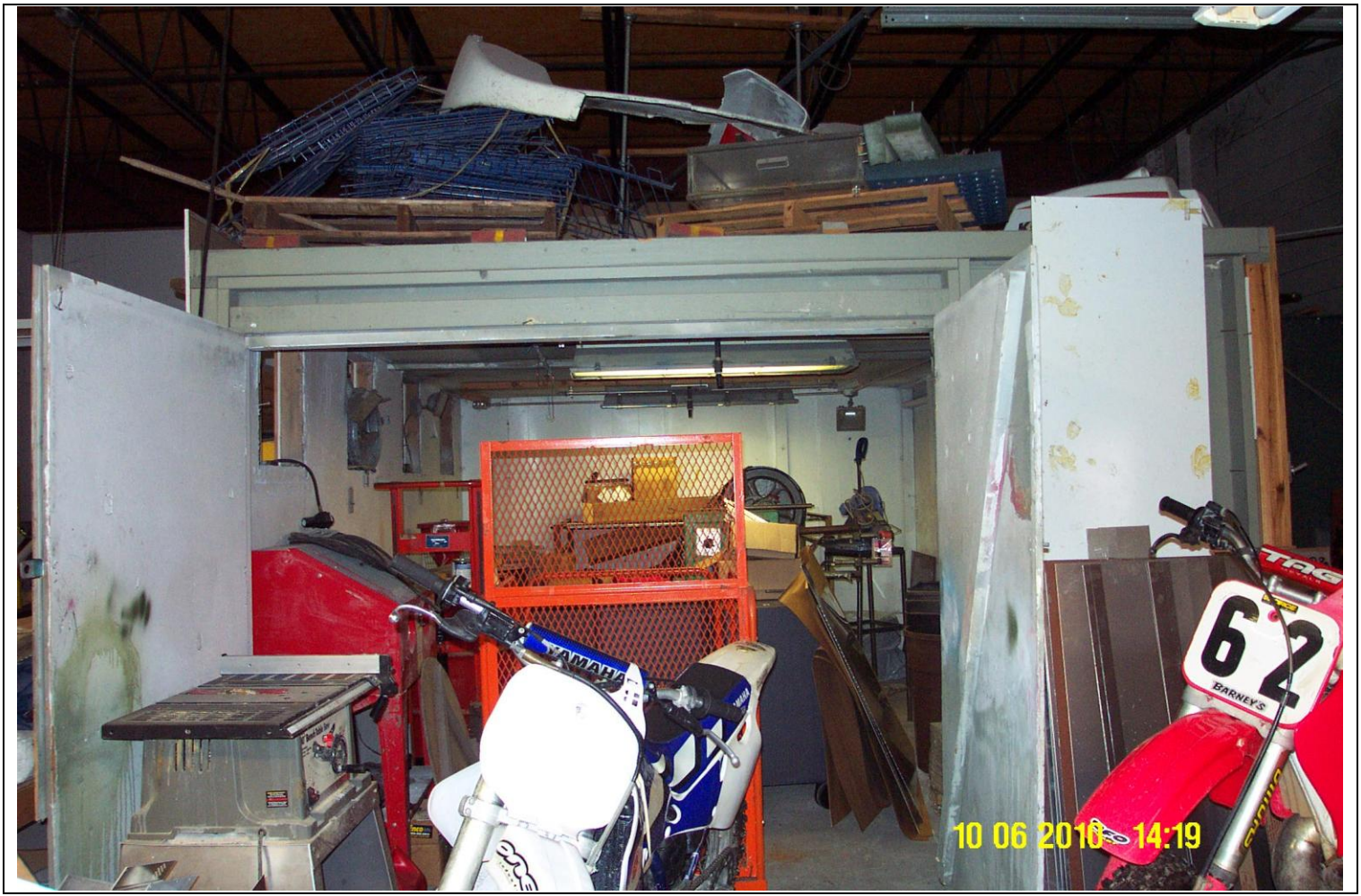

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Description: [This spray booth has not been operated in several years, the facility allows employees to store various items in it]