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:** **11/26/2007** **TIME IN:** **12:30PM** **TIME OUT:** **1:15 PM**

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 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 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	❑	❑	:N/A
❑	reduced room draft / 1.0 freeboard ratio / dwell	❑	❑	:N/A
❑	freeboard refrig. device / superheated vapor	❑	❑	:N/A
❑	freeboard refrig. device / working mode cover	❑	❑	:N/A
❑	freeboard refrig. device / reduced room draft	❑	❑	:N/A
❑	freeboard refrig. device / 1.0 freeboard ratio	❑	❑	:N/A
❑	freeboard refrig. device / dwell	❑	❑	:N/A
❑	freeboard refrig. device / carbon adsorber	❑	❑	:N/A
❑	carbon adsorber / 1.0 freeboard ratio / superheated vapor	❑	❑	:N/A

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

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

D. New In-Line Machines

control comb. selected		In use
❑	freeboard refrig. device / superheated vapor	:N/A
❑	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, Steve Ladoniczki.

- *I reviewed the records from October 2006 through October 2007. There have been no exceedances of the emission limit of 30.7lbs/ft2/month. The highest 3- month rolling average observed was 17.34 lbs/ft2 for the month of September 2006.*
- *During the tour of the facility, I observed the facility continues to use isopropyl alcohol for the pre cleaning of circuit boards before submersion in the degreasing tank.*
- *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. There were some parts in the tank being processed 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 using the booth for storage of the waste paint drum. They are considering putting it back into use for the coating of some of the parts with the polyethylene acrylic clear coat. (See photos) Currently they use another hood area used for the coating of some parts with a polyethylene acrylic clear coat. The usage is approximately 1 - 2 gallon / month at this time.*
- *I discussed Pollution Prevention practices and possible use of alternatives to Trichloroethylene usage with Mr. Ladoniczki, and gave him the P2 pamphlet. The levels of usage were slightly lower then the previous year. Mr. Ladoniczki, stated they continue to minimized tank operation time.*
- *The October - 3 month rolling average was 12.02. This last years highest 3- month total was 17.34 in September, compared to last years highest was 18.3 for the 3- month average.*
- *The facility records and Halogenated degreasing operations were in compliance at this time. (See copies in file)*

Shea Jackson — Inspector's Name

November 26, 2007 — Date of Inspection

_____ — Inspector's Signature

2008 — Approximate Date of Next Inspection

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