

6.1 COLD SOLVENT CLEANING

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Process Description

A Cold (Non-boiling) Cleaner is defined in [Regulation 8-16-204](#) as any solvent cleaner, excluding [conveyorized solvent cleaners and vapor solvent cleaners](#), including, but not limited to, spray sinks, spray booths, spray gun cleaners and batch-loaded dip tanks. Any cold cleaner, which uses 20 or more gallons per year of solvent (>50 g/l or 0.42 lb/gal VOC) is subject to permitting requirements, per [Regulation 2-1-118.4](#) and [Regulation 2-1-118.7](#). Additional background information is available from [Chapter 4.6, Solvent Degreasing](#), of [AP-42 \(Fifth Edition, Volume I\)](#).

Spray gun cleaners that are associated with coating sources (i.e., cleaning of coating application equipment or cleaning of surfaces prior to their coating) are to be permitted, as part of a coating operation and this permit chapter does not apply -- See [Spray Booths & Spray Guns](#).

Completeness Determination

The following District forms should be completed and fees provided for cold cleaner(s). Use the [Completeness Determination Checklist](#) to verify completeness. Use the [Data Form Guidance](#) to ensure that the forms are completed correctly. Use the [Fee Calculation Guidance](#) to ensure that the fees are calculated accurately.

1. [Form 101-B](#) (one for facility).
2. [Form S](#) (one per source).
3. [Form SC](#) (one per source).
4. Material Safety Data Sheet for each solvent used, if it is a mixture of compounds.
5. If cold cleaner exhausts into add-on abatement device, [Form A](#) (one per device).
6. If Health Risk Screening is triggered, [Form HRSA](#) (one per source).
7. Fees, calculated per [Regulation 3 \(Schedule E\)](#).

Emission Calculations

Net organic solvents used in cold cleaners are assumed to be 100 percent volatile and emitted into the atmosphere. Annual emissions are calculated by multiplying the annual net solvent usage by the density of the organic solvent.

Applicable Requirements

District Rules and Regulations

In general, cold cleaners are subject to the operating standards of [Regulation 8-16-303](#). All facilities that use cold cleaners for repair and maintenance operations (defined in [Regulation 8-16-233](#)) are required to use aqueous cleaners (VOC < 50 grams/liter) or methylated siloxanes (VMS), unless exempt per [Regulation 8-16-123](#). Repair and maintenance operations typically include but are not limited to vehicle and other machine repair shops. If cold cleaners use aqueous cleaners then they are exempt from permitting requirements per [Regulation 2-1-118.7](#). However, use of methylated siloxanes is NOT exempt from permit requirements. Cold cleaners using methylated siloxanes must be permitted. The District permit evaluator should review the applicant's SC Form to ensure that the source meets applicable operating standards or else request such information from the applicant.

Best Available Control Technology (BACT)

BACT for Cold Cleaners is specified in the [BACT/TBACT Workbook](#). The following are applicable BACT requirements for:

- Cold Solvent Cleaning
- [Degreaser - Cold Solvent Tank](#)

Inform the [BACT Coordinator](#) of updates to the BACT/TBACT Workbook.

California Environmental Quality Act (CEQA)

Permit applications which are reviewed following the specific procedures, fixed standards and objective measurements set forth in this chapter (6.1) are classified as ministerial and will accordingly be exempt from CEQA review per [Regulation 2-1-311](#).

NESHAP may apply for those cold cleaners using halogenated cleaning solvents specified in [Regulation 8-16-216](#) at a total concentration of 5 percent or more by weight.

In addition to the above-mentioned source-specific applicable requirements, other requirements may also be applicable depending on the facility, its application emissions, and its source location:

- Offsets
- School Notification
- Prevention of Significant Deterioration
- Risk Screening Analysis

Permit Conditions

Standardized conditions for cold cleaners are available from the [Permit Condition Guidance](#). Refer to the [Evaluation Report Template Guidance](#) to obtain the Microsoft Word formatted permit conditions for this source category.