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## FACT SHEET For SURFACE PREPARATION AND CLEANUP

This fact sheet has been written to advise those facilities that have surface preparation and cleanup operations of rule changes that may affect them. On December 13, 2003, the Placer County Air Pollution Control District Board of Directors amended Rule 240, Surface Preparation And Cleanup. The effective date for the new provisions is December 13, 2004 - 12 months from the date the amended rule was adopted.

Rule 240, Surface Preparation And Cleanup, regulates solvent cleaning activities from coating and manufacturing operations that are not specifically regulated by other District rules. The amendments to this rule broadened its applicability to include cleaning activities such as cleaning of electrical apparatus and electronic components, architectural coating application equipment, polyester resin application equipment, and automotive repair cleaning, which had not been regulated. The rule also specifies cleaning method requirements, general equipment requirements, operating requirements, storage and disposal requirements, and recordkeeping requirements. This rule is applicable to operations in all of Placer County.

New and lower Volatile Organic Compound (VOC) limits were set for solvent cleaning activities. These lower limits are consistent with the limits currently in place in Sacramento and other jurisdictions and are proven to be feasible. Partial or complete exemptions are allowed in numerous cases as listed in Section 104 of the rule.

This rule regulates VOC emissions from cleaning operations using solvents. The amended rule:

- Requires non-vapor degreasing operations (also referred to as cold degreasing) use cleanup material that contains no more than 50 grams per liter of VOCs.
- Allows the use of air pollution control devices or airtight/airless cleaning systems as an alternative to complying with the 50 grams per liter VOC limit.
- Outlines the allowable cleaning materials, methods and equipment under Standards.
- Clarifies rule requirements in response to both California Air Resources Board and public comments on the rule.
- Expands recordkeeping requirements due to the increased number and type of materials.

### EXEMPTIONS

A number of exemptions were also adopted including:

- Cleaning with solvents that contain 50 grams per liter or less VOCs as applied including water and exempt compounds.

- Cleaning of solar cells, laser hardware, scientific instruments and high-precision optics.
- Cleaning of cotton swabs to remove cottonseed oil before cleaning of high-precision optics;
- Cleaning of paper-based gaskets and clutch assemblies where rubber is bonded to metal by means of an adhesive.
- Cleaning of application equipment used to apply coatings on satellites and radiation effect coatings.
- Cleaning of electrostatic coating application equipment.
- Janitorial cleaning, including graffiti removal.
- Cleaning of nozzle tips of automated spray equipment systems, except for robotic systems; and
- Use of some halogenated solvents regulated by United States Environmental Protection Agency (USEPA) under 40 CFR Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning.

While the next two types of cleaning solvents are exempt from other rule provisions, recordkeeping is required:

- Cleaning of sterilization ink indicating equipment provided if the solvent usage is less than 1.5 gallons per day with solvents that contain more than 50 grams/liter VOC as applied.
- Cleaning with aerosol, if 160 fluid ounces or less of aerosol product are used per day, per stationary source with solvents that contain more than 50 grams/liter VOC as applied.

## **RECORDKEEPING**

Additionally the recordkeeping requirements were expanded. Those subject to this rule are required to:

- Maintain on-site a list of solvents used on site including the cleaning material type by name/code/manufacturer, the VOC content including water and exempt compounds, and the mixing ratio as applied and if sold to include recommendations regarding thinning, reducing or mixing with any solvent, if applicable.
- ***Monthly*** records must be updated and maintained listing the total applied volume in gallons for each cleaning material used and solvent cleaning activity with each solvent used.
- ***Annually*** for those operations claiming partial exemption, the type and volume of solvent used must be kept.
- ***Daily*** records must be kept, for those using emissions control equipment, on key operating parameters including hours of operation, and on routine and non-routine maintenance, in addition to records required as part of the Operation and Maintenance Plan and records of testing.

For further information, Rule 240, Surface Preparation And Cleanup, is available on the District's website at [www.placer.ca.gov/apcd](http://www.placer.ca.gov/apcd) or feel free to contact District staff at 530-889-7130.