



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Environmental Program Fact Sheet

RCSA 22a-174-20(l)

Control of Organic Compound Emissions, Metal Cleaning

Overview

Section 22a-174-20(l) of the Regulations of Connecticut State Agencies (RCSA) specifies hardware and operating requirements to limit the volatile organic compound (VOC) emissions released from metal cleaning operations. VOCs contribute to the formation of ground-level ozone. Connecticut does not meet the federal health-based air quality standards for ground-level ozone, making its reduction a priority. Effective July 26, 2007, RCSA Section 22a-174-20(l) was amended to further limit VOC emissions to make further progress toward federal ozone standard attainment.

Authorizing Statutes

Sections 22a-170 and 22a-174 of the Connecticut General Statutes

Regulations

RCSA Section 22-174-20(l)

Effective Date

July 26, 2007

New Regulatory Provisions for Operation of Cold Cleaning Units

On or after May 1, 2008, owners and operators of cold cleaning units must use solvent with a vapor pressure less than or equal to 1.0 mmHg at 20°C. This is a reduction from the previous vapor pressure limit of 33 mmHg at 38°C.

Cold cleaning unit work practice requirements are amended as follows:

- Waste solvent must continue to be stored in closed containers; however, the regulation has been amended to allow a pressure relief device on waste solvent containers as long as it does not allow any liquid drainage.
- Leaks and spills must be cleaned immediately and resultant waste stored in covered containers.
- Cold cleaning units are not to be used to clean absorbent materials, such as sponges, fabric, wood, leather, or paper.

New Record Keeping Requirements for Operators of Cold Cleaners

Record retention time has increased from two to five years. Records shall include:

- The type of solvent used, including a description of the solvent and the solvent name;
- The vapor pressure of the solvent in mmHg measured at 20°C (68°F);
- The percent VOC content by weight; and
- The amount of solvent added to each unit on a monthly basis.

Requirements for Suppliers of Solvent Containing VOCs for Cold Cleaners

On and after May 1, 2008, solvent suppliers shall provide purchasers with the following information:

- The type of solvent, including a description of the solvent and the solvent name;
- The vapor pressure of the solvent measured in mmHg at 20°C (68°F); and
- The percent VOC content by weight.

Exemptions for Users of Cold Cleaners

Cold cleaning units with an internal volume of 1 liter or less and using solvents containing 5% VOCs or less by weight are not subject to the vapor pressure limit and other operating requirements.

An exemption to the 1.0 mmHg pressure limit is provided for:

- Units used for special and extreme solvent cleaning (as defined in RCSA Section 22a-174-20(l)(1)(K));
- Users who demonstrate compliance would create unsafe operating conditions (requires Commissioner's approval); or
- Units operated in a permanent total enclosure equipped with control equipment with an overall VOC removal efficiency of 90% or greater.

Units used for special and extreme solvent cleaning are exempt from the degreasing solvent spray (RCSA Section 22a-174-20(l)(3)(F)) and draft minimization (RCSA Section 22a-174-20(l)(3)(F)) requirements if the owner/operator can demonstrate:

- Such solvent consumed at the premises is less than 3,000 gallons in any 12 month period, and
- Such solvent has a VOC content of less than 7.7 lb/gal.

New Regulatory Provisions for Operators of ConveyORIZED Degreasers

Continuous web cleaning machines may be operated at a conveyor speed greater than 11 feet per minute if:

- The machine is equipped with a solvent removal system (e.g. air knife or squeegee), and
- No solvent film is visible on parts as they exit the machine.

Record retention time has increased from two to five years.

Useful Resources

Copies of the Air Management Regulations of Connecticut State Agencies may be obtained at www.ct.gov/dep or by calling the Planning and Standards Division at 860-424-3027.

Contact Information

Engineering and Enforcement Division
Bureau of Air Management
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127
860-424-4152

This overview is designed to answer general questions and provide basic information. You should refer to the appropriate statutes and regulations for the specific regulatory language of the different permit programs. This document should not be relied upon to determine whether or not an environmental permit is required. It is *your* responsibility to obtain and comply with all required permits.