

Environmental Alert

Parts Washer Air Permit and Operating Rules Applicability

The New Jersey Department of Environmental Protection (NJDEP) issued a Compliance Alert in December 2009 to notify facilities, including Departments of Public Works, Utility Authorities and other public entity maintenance garages, that air permits are required for certain open-top parts washers, and that such facilities will be subject to enforcement, violations, and fines.

The NJDEP Compliance Advisory is located at this webpage: www.nj.gov/dep/enforcement/advisories/2009-15.pdf

Air Permit Applicability

Does your facility's open-top parts washer:

- 1) Have a surface area greater than 6 square feet (2 ft. by 3 ft. or 1.5 ft. by 4 ft, for example)?
- 2) Have a total volume of greater than 100 gallons?
- 3) Use a heated cleaning solution?

If you answered yes to any of the above and the cleaning solution contains five (5) percent or more of volatile organic compounds (VOC), hazardous air pollutants (HAPs) or a combination of both, then your parts cleaner is required to have an air permit in ac-

cordance with N.J.A.C. 7:27-8.2(c)4.

It is important to review the Materials Safety Data Sheet (MSDS) for the parts washing cleaning solution used to find information on ambient vapor pressure, the percentage of VOCs, and listed HAPs. Please note that many "green" and "citrus" cleaners contain a concentration of VOCs or HAPs or both which may render them subject to permitting.

If your facility has an unheated parts washer that requires an air permit, and the cleaning solution has an ambient (room temperature) vapor pressure of less than 1 millimeter mercury (1 mm Hg) or 0.02 pounds per square inch (psi) and uses a non-HAP cleaning solution, then a General Permit (GP-010) can be filed online (www.state.nj.us/dep/aqpp/

[gp.html](#)) for a filing fee of \$410.

Some cleaning solutions that appear to be environmental friendly contain butyl cellosolve (2-butoxyethanol) which is a HAP. If this is the case, or if the cleaning solution does not meet the vapor pressure requirements above, the facility may be required to obtain a Preconstruction Permit, using NJDEP's RADIUS program with a filing fee of \$1,755.

Operating Rules Applicability

If your facility's non-heated parts washer can store two (2) gallons or more of solvent, regardless of whether it is subject to air permitting, required operational rules listed in N.J.A.C. 7:27-16.6 are to be followed. NJDEP requires that these operating rules be posted near the parts washer. A summary of the operating rules follows:

1) Solvent shall have an ambient vapor pressure less than 1 mm Hg (0.02 psi).

2) Parts cleaner must be equipped with a tightly fitting cover.

--Immersion style parts cleaners shall be closed at all times except when adding or removing parts or solvent.

--Sink-on-a-drum style cleaners shall be always closed when not in use unless they are equipped with a drain that allows solvent to go directly to sealed storage, and the drain is clear with no solvent present in the sink.

3) Records of invoices of parts washer cleaner purchased along with associated MSDS sheets must be stored at the facility for 2 years.

4) The freeboard ratio for an immersion parts washer (which is the distance between solvent surface and the top of the machine, divided by the narrower dimension of the unit) cannot be less than 0.75. For example, a 2 foot by 4 foot immersion cleaner cannot be filled any higher than 1.5 feet below the top of the machine (0.75 times 2).

5) Immersion parts cleaners shall also have a liquid fill line and a high-level liquid mark.

If your parts washer is subject to an air permit, then in addition to these operating rules, the facility shall follow monitoring and recordkeeping procedures in accordance with the permit's compliance plan.

A complete list of operating rules for many types of parts washers is available at www.state.nj.us/dep/aqm/Sub16.pdf. Specifically, see N.J.A.C. 7:27-16.6(j).

Major Facility Guidance

If your facility has a Title V Operating Permit, AND even if the parts washer is not subject to an air permit, it needs to be listed as an Insignificant Source in your Operating Permit. Also, if your facility is subject to submitting an Air Emission Statement, and your parts washer does not require an air permit, VOC emissions from it need to be reported as emissions from an Insignificant Source.

If you have questions regarding this Environmental Alert, or if you are unsure whether your parts washer needs an air permit or must follow operating rules, please contact Rich Erickson at 908-497-8900 or Rich Cestone at 732-751-0799.

