

# Battelle

*The Business of Innovation*

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January 25, 2006

Dr. David A. Lauer, Control Officer  
Benton Clean Air Authority  
114 Columbia Point Drive, Suite C  
Richland, WA 99352

Dear. Dr. Lauer:

## SUBMITTAL OF 2005 BATCH VAPOR SOLVENT EMISSION AND EXCEEDANCE REPORT

The following information is submitted in response to the reporting requirements of 40 CFR 63.468, "Reporting Requirements," Section (g). The data collected are shown below and are sufficient to determine that the applicable emission limit of 150 Kg/m<sup>2</sup> was not exceeded. Although most of the data reported was not collected at the beginning of each month as required, actions have been taken to correct this procedure implementation error in the future.

Westinghouse Electric Corporation  
Ultrasonic Batch Vapor Degreaser  
Model #EDG1K1420  
Serial #32031-1  
Solvent-Air Interface Area: 0.52m<sup>2</sup>  
Average Solvent Consumption: ≤22.4 kg/month  
Average Solvent Emissions: ≤18.2 kg/month

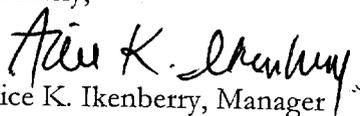
Calendar Year 2005 Solvent Emissions			
Month	Fill Date	Emissions Between Fills, kg/m <sup>2</sup>	Maximum Possible Emissions in Month, kg/m <sup>2</sup>
January	1/26/2005	85.0	100.9
February	2/22	15.9	79.7
March			63.8
April			63.8
May	5/27	63.8	103.1
June			83.9
July	7/8	39.3	83.9
August	8/1	44.6	148.8
September	9/27	63.8	148.8
October			85.0
November	11/23	85.0	106.3
December	12/21	21.3	42.6
January	1/13/2006	21.3	

This degreaser is operated under 40 CFR 63.464, "Alternative Standard," for solvent-air interface machines. The solvent 1,1,2-trichloroethylene (CAS 79-01-6) was used. It was not possible to calculate 3-month rolling average emissions in accordance with 40 CFR 63.465, "Test Methods," Section (c). However, it was possible to determine the maximum possible emission in each month as shown above. For example, the emissions in January would include the 85.0 kg/m<sup>2</sup> that occurred between the start of the month and January 26, 2005, but also could have included the 15.9 kg/m<sup>2</sup> recorded as occurring between January 26 and February 22, 2005. Therefore the emissions in January could have been as much as 100.9 kg/m<sup>2</sup>. This same approach was applied to each month. Since the maximum possible emissions in any month did not exceed 150 kg/m<sup>2</sup>, the 3-month rolling average could not have exceeded the applicable 3-month rolling average limit of 150 kg/m<sup>2</sup> provided in 40 CFR 63.464. Emissions were conservatively calculated by not taking credit for any solvent removed in solid wastes.

This result is being reported in accordance with the requirements of 40 CFR 63.468, Sections (g) and (h).

If you have any questions, please contact Mr. Rodger K. Woodruff at (509) 373-6396.

Sincerely,



Alice K. Ikenberry, Manager  
Environmental Management Services Department

AKI/RKW/rrp

Attachments

Dr. David A. Lauer  
January 25, 2006  
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bcc: John L. Akers  
Brad P. Atencio  
Cheryl J. Duchsherer  
Gordon L. Graff  
AKI:LB  
AIR TOXICS RIDS

# HALOGENATED SOLVENT CLEANER NESHAP:

## Exceedance Report

### PART ONE - General information

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Person Preparing Report: Woodruff      Rodger      K      Date January 16, 2006  
Last Name,      First Name,      Middle Initial

Company Name:      Battelle – Pacific Northwest Division

Mailing Address:      P.O. Box 999, MSIN J2-25      Richland      WA      99352  
Number,      Street,      City/Town,      State,      Zip Code

Equipment  
Location Address:      520      3<sup>rd</sup> Street      Richland      WA      99354  
Number,      Street      City/Town,      State,      Zip Code

#### Cleaning Machine Summary:

##### Identification Number

Serial # 32031-1

##### Description

Westinghouse Electric Corporation  
Ultrasonic Batch Vapor Degreaser  
Model # EDG1K1420

# HALOGENATED SOLVENT CLEANER NESHAP:

## Exceedance Report

### PART TWO – Information Required per Machine

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Cleaner Identification Number: Serial # 32031-1

Check appropriate box and answer the requested information:

**Exceedance**

Exceedance that occurred: \_\_\_\_\_  
\_\_\_\_\_

Date of occurrence: \_\_\_\_\_

Actions taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Results of actions: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**No exceedance occurred**