

Air Program Fact Sheet

Solvent Metal Wipe Cleaning RACT

February 2017

What is the Solvent Metal Wipe Cleaning RACT?

The purpose of this summary is to explain how the RACT (Reasonably Available Control Technology) rule for Solvent Metal Wipe Cleaning may affect a business. This regulation was created as a result of the Clean Air Act Amendments of 1990, mandating that states with ozone problems reduce volatile organic compound (VOC) emissions, a primary cause of ozone. The location and size of a business, and the types of chemicals used, will determine how this law affects a facility. The actual regulation can be found in section NR 423.03 of the Wisconsin Administrative Code.

When does this regulation affect a business?

This rule applies to businesses located in ozone nonattainment and former nonattainment areas that use solvent to manually wipe soils from the metal surfaces of products or product components. This includes facilities in the counties of Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Washington and Waukesha.

This rule does not apply to general facility maintenance or cleanup of equipment such as printing presses or spray guns.

Are there any exemptions to this regulation?

The following exemptions apply to individual wipe cleaning operations:

- Individual wipe cleaning operations that emit no more than 15 lbs (6.8 kg) of VOCs in any one day are exempt from the pollution control device requirements.
- Individual wipe cleaning operations using only cleaning solvents having a VOC content of 2.0% or less are exempt from all requirements of this rule (except record keeping of VOC content %).

Exempt facilities located in affected areas must maintain adequate records to support their exemption.

How does a business comply with this regulation?

Affected businesses must comply in three areas:

1. operating requirements
2. control device requirements
3. record keeping

An explanation of each type of compliance requirement is included in this summary. The compliance deadlines have passed, so affected businesses should now be in compliance with this rule.

1) Operating requirements

- Do not allow solvent to drip from the applicator during application.
- Provide a label stating the operating requirements. Provide supervision or instruction to ensure that the operation is conducted appropriately.
- Immediately after use, store all solvent-laden rags in a covered container that is labeled as waste solvent.
- Store waste solvent in covered containers labeled as waste solvent.

2) Control device requirements

Use either:

- a carbon adsorption system demonstrated to have at least a 90% capture efficiency and a 90% control efficiency, measured across the carbon adsorption equipment and averaged over a complete adsorption cycle
- a solvent with a volatility less than 0.3 psia at 100°F
- another equivalent system approved by the Department of Natural Resources (DNR)

3) Record keeping

Businesses located in the nonattainment or former nonattainment areas that are exempt from all or part of this regulation must maintain records proving they qualify for an exemption. Keep the following information on hand for at least three years:

- unique name or identification number for each wipe cleaning operation
- volume of solvent used or added per day in each individual degreaser or wipe cleaning operation, in gallons
- VOC emissions per day from each individual degreaser or wipe cleaning operation, in pounds
- density of the solvent used, in pounds per gallon, and
- VOC content of the solvent, expressed as percent of VOC by volume of solvent

Information on the VOC content and density of the solvents used can be obtained from the Safety Data Sheets (SDS) or suppliers.

Pollution prevention

There is a common misconception that waste reduction efforts are costly and provide little economic benefit to a business. In reality, pollution prevention efforts can increase competitiveness, simplify compliance with environmental regulations, decrease waste disposal costs, decrease liability and improve worker health and safety.

The requirements of the Solvent Metal Wipe Cleaning RACT help reduce the amount of pollution generated by industry. While a single facility may not be a major cause of pollution, together all the facilities involved in wipe cleaning represent a significant source of emissions. With the use of more efficient equipment and operating procedures, emissions of volatile organics will be minimized while reducing costs for the business and increasing bottom line profits.

Additional efforts to reduce waste and increase profits could include:

- training operators in efficient application techniques. This will maximize the performance of both operators and equipment.
- keeping solvents and other VOC containing materials in closed containers. This will reduce evaporation and protect the health and safety of your workers.
- controlling inventory and rotating stock. Some solvents may have a limited shelf life. Check with suppliers for expiration dates.

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