



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



ATTACHMENT # 1

STATE OF CONNECTICUT )  
DEPT. OF ENVIRONMENTAL PROTECTION )

VS. )

STANADYNE, INC. )  
WINDSOR, CONNECTICUT )

STATE ORDER NO. 8018

Proposed; November 21, 1988  
Final; December 14, 1988

WHEREAS, Stanadyne, Incorporated (hereinafter, the "Company") headquartered in Wilmington, Delaware and doing business at 92 Deerfield Road in Windsor, Connecticut operates a diesel engine parts manufacturing business utilizing twenty-four (24) metal parts cleaning units (hereinafter, the "degreasing units"), fifteen (15) rust prevention dip tanks and hand wiping for the purpose of metal degreasing subject to the standards and limitations of Connecticut's Administrative Regulations for the Abatement of Air Pollution (hereinafter, Regulations); and

WHEREAS, the twenty-four (24) degreasing units, fifteen (15) rust prevention dip tanks and hand wiping functions are subject to Subsection 22a-174-20(ee) of the Regulations which requires a demonstration of Reasonably Available Control Technology (RACT) for any source whose "actual" emissions, as currently defined in the Regulations, of Volatile Organic Compounds (VOC) are greater than one hundred (100) tons per year; and

WHEREAS, the discharges of VOC emissions are required to be limited by RACT by 12/31/85 unless a compliance plan is filed under Subdivision 22a-174-20(ee)(3); and

WHEREAS, documentation obtained through a plant inspection conducted by the Department of Environmental Protection (hereinafter, the "Department" or "DEP") indicates that "actual" emissions exceed one hundred (100) tons per year of VOC at the Company; and

WHEREAS, the Commissioner of the Department (hereinafter "Commissioner") issued Notice of Violation No. 11062 to the Company on September 8, 1986 in view of the December 31, 1985 deadline imposed by the Regulations for compliance with Subsection 22a-174-20(ee) of the Regulations; and

Phone:

WHEREAS, the Company has proposed RACT for the twenty-four (24) degreasing units, fifteen (15) rust prevention dip tanks and hand wiping functions and its determination has been accepted by the Commissioner; and

WHEREAS, the Company and this Department each acknowledges that final approval of the RACT proposal must be issued by the United States Environmental Protection Agency in that approval of RACT proposals required pursuant to Subsection 22a-174-20(ee) must be submitted as revisions to Connecticut's State Implementation Plan.

NOW, THEREFORE, by authority of Section 22a-178 et. seq. of the Connecticut General Statutes and Section 110(a) of the Clean Air Act, as amended, 42 U.S.C. Section 7410(a), the Commissioner hereby orders the Company to complete the following measures, as further delineated by the Compliance Timetable which accompanies and is hereby incorporated by reference into this Order. The applicable requirements are as follows:

1) The Company has a total of twenty-four (24) degreasing units, eighteen (18) of which use the exempt VOCs 1,1,1 Trichloroethane, Freon TF (Dichlorodifluoromethane) and Freon TMC (a blend of methylene chloride and trichlorotrifluoroethane). Freon TMC will be utilized plant-wide beginning January 1, 1989 as a permanent replacement for the VOC Freon TC-7 previously utilized. These eighteen (18) units are identified by DEP identification nos. D-102, D-103, D-104, D-105, D-106, D-107, D-111, D-112, D-113, D-114, D-115, D-116, D-117, D-118, D-119, D-120, D-123 and D-124. All are vapor degreasing units with the exception of D-113, which is a cold degreasing unit. Subsection 22a-174-20(1) of the Regulations does not apply to the above equipment. The Company agrees not to convert to the use of a VOC in any of the above-referenced degreasing units utilizing exempt VOCs at any time in the future. The Niagra parts washer, identified by DEP No. D-121 (vent no. 46) uses Mineral Seal Oil, a VOC with negligible volatility. Because of the low volatility of Mineral Seal Oil, the Niagra parts washer is exempted from the requirements of Subsection 22a-174-20(ee) of the Regulations. The Company agrees not to convert to the use of a VOC with a vapor pressure exceeding 0.1 millimeters of mercury at actual operating conditions in the Niagra parts washer at any time in the future.

2) The remaining five (5) degreasing units, identified by DEP Nos. D-101, D-108, D-109, D-122 and D-125, utilize Perchloroethylene or Mineral Spirits. The Mineral Spirits utilized in Unit D-122 has a volatility of five (5) millimeters of mercury measured at 100°F. The Company agrees that at no time in the future will a VOC with a volatility greater than five (5) millimeters of mercury measured at 100°F be utilized in Unit D-122. Unit type and solvent use are as follows:

<u>Conveyorized Vapor Degreasers</u>	<u>Solvent</u>
D-101	Perchloroethylene
<u>Vapor Degreasers</u>	<u>Solvent</u>
D-108	Perchloroethylene
D-109	Perchloroethylene
<u>Ultrasonic Vapor Degreaser</u>	<u>Solvent</u>
D-125	Perchloroethylene
<u>Cold Dip Tank</u>	<u>Solvent</u>
D-122	Mineral Spirits

3) Of the five (5) degreasing units described in paragraph two (2), three (3) units identified by DEP Nos. D-101, D-108 and D-109 were previously exempted from Subsection 22a-174-20(1) of the Regulations because they were installed prior to 1980. For the purpose of compliance with Subsection 22a-174-20(ee) of the Regulations, RACT has been defined as meeting the requirements of Subsection 22a-174-20(1) of the Regulations in addition to the requirements stipulated in paragraphs six (6) through nine (9) of this Order for these three (3) degreasing units.

4) In addition to the requirements of Subsection 22a-174-20(1) of the Regulations, the following requirements, contained in paragraphs six (6) through nine (9) of this Order apply to the degreasing units presently utilizing VOCs as well as to any degreasing unit utilizing a VOC which may be added at any time in the future with the following exception. Unit D-125, which is utilized in the Company laboratory for the removal of an epoxy resin from small engine parts, utilizes a de minimus amount

of the VOC Perchloroethylene; annual usage twenty-one (21) gallons in 1987. This Unit shall be exempt from the control requirements stipulated by this Order. VOC usage in Unit D-125 shall be limited to twenty-five (25) gallons per year. The Company shall demonstrate compliance with this limitation through the maintenance of annual records of VOC use in this Unit.

5) This Order does not relieve the Company of its obligation to comply with any of those requirements in Subsection 22a-174-20(1) of the Regulations for any period of time after the applicable final compliance date contained in Section 22a-174-8 of the Regulations.

6) The cold dip tank (DEP No. D-122) and any new cold cleaning degreasing units utilizing a VOC which may be added at any time in the future shall comply specifically with the requirements described below with the following exception. The Mineral Spirits cold dip tank (DEP No. D-122) which utilizes a VOC with volatility of five (5) millimeters of mercury measured at 100°F, and which is neither agitated nor heated, shall not be required to comply with paragraphs 6A, 6B or 6C. Should any of the above-referenced conditions be modified in the future so as to subject Unit DEP No. D-122 to any or all of the provisions as outlined in paragraph six (6) A, B and C, the Company must immediately comply with the appropriate provisions and notify this Department of the modification. Notwithstanding the above, at no time will the Company utilize a VOC with volatility greater than five (5) millimeters of mercury measured at 100°F in Unit D-122.

- A) The cover on each degreasing unit shall be designed so that it can be easily operated with one hand; if,
  - (i) the solvent volatility is greater than 2 kilo Pascals (15 millimeters of mercury or 0.3 pounds per square inch) measured at 38°C (100°F); or,
  - (ii) the solvent is agitated; or,
  - (iii) the solvent is heated.
- B) The drainage facility on each degreasing unit shall be constructed internally so that parts are enclosed under the cover while draining if the solvent volatility is greater than 4.3 kilo

Pascals (32 millimeters of mercury or 0.6 pounds per square inch) measured at 38°C (100°F), except that the drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- C) The Company will install one of the following control devices if the solvent volatility is greater than 4.3 kilo Pascals (33 millimeters of mercury or 0.6 pounds per square inch) measured at 38°C (100°F), or if the solvent is heated above 50°C (120°F);
- (i) freeboard that gives a freeboard ratio greater than or equal to 0.7; or,
  - (ii) water cover (solvent must be insoluble in and heavier than water); or,
  - (iii) other systems of equivalent control, such as refrigerated chiller or carbon adsorption approved by the Commissioner
- D) All cold degreasing units utilizing spray devices shall spray the VOC in a solid fluid stream not a fine, atomized or shower type spray, at a pressure which does not exceed ten (10) pounds per square inch (psi) as measured at the pump outlet. All such spraying shall be performed only within the confines of the cold degreasing unit.
- E) The Company shall minimize the drafts across the top of each open cold degreasing unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters/minute, as measured between 1 and 2 meters upwind, and at the same elevation as the tank lip.
- F) All cold degreasing units (both spray and dip units) shall have covers. The covers shall be closed while parts are sitting in the VOC for two (2) minutes or greater or when the unit is not in use.

- G) All cold degreasing units (both spray and dip units) shall be equipped with facilities for draining cleaned parts. The cold degreasing units shall drain cleaned parts for a minimum of fifteen (15) seconds or until dripping ceases, whichever is longer.
- H) The temperature of the solvent in every cold degreasing unit shall always be maintained below 100°F.
- 7) The conveyORIZED vapor degreasing unit (DEP No. D-101) and any new conveyORIZED vapor degreasing units utilizing a VOC which may be added at any time in the future shall comply specifically with the requirements described below.
- A) Each conveyORIZED degreaser shall have a freeboard ratio of at least 0.75. "Freeboard ratio" means the ratio of the freeboard height to the smaller interior dimension (length, width, or diameter) of the degreaser. Freeboard height for a conveyORIZED vapor degreaser is the distance from the vapor level to the bottom of the entrance or exit opening, whichever is lower. Additionally, the Company shall not provide exhaust ventilation exceeding twenty (20) cubic meters per minute per square meter (65 cubic feet per minute per square foot) of degreasing unit open area, unless necessary to meet OSHA requirements.
- B) In addition to the requirements of Subparagraph 22a-174-20(1)(5)(ii) of the Regulations, the Company must provide a vapor level control thermostat which shuts off the pump heat when the vapor level rises too high.
- C) Openings must be minimized during operation so that entrances and exits will silhouette workloads with an average clearance between the parts and the edge of the degreasing unit opening of less than ten (10) centimeters (4 inches) or less than ten (10) percent of the width of the opening.

- D) Carryout emissions must be minimized by;
  - i) racking parts for best drainage; and
  - ii) maintaining the vertical conveyor speed at less than 3.3 meters per minute (11 feet per minute).
- E) The degreasing unit may not be operated so as to allow water to be visually detectable in the solvent exiting the water separator.
- F) Place downtime covers over entrances and exits of degreasing units immediately after the conveyors and exhausts are shut-down and do not remove the covers until just prior to start-up.
- G) Degreasing units will be equipped with a device such as a drying tunnel or rotating (tumbling) basket, sufficient to prevent cleaned parts from carrying out solvent liquid or vapor.

8) The open top vapor degreasing units (DEP Nos. D-108 and D-109) and any new open top vapor degreasing units utilizing a VOC which may be added at any time in the future shall comply specifically with the requirements described below.

- A) Solvent carryout must be minimized by;
  - (i) racking parts to allow complete drainage; and,
  - (ii) moving parts in and out of the degreasing unit at less than 3.3 meters per second (11 feet per minute); and,
  - (iii) holding the parts in the vapor zone at least thirty (30) seconds or until condensation ceases, whichever is longer; and,
  - (iv) tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and,
  - (v) allowing parts to dry within the degreasing unit for at least fifteen (15) seconds or until visually dry, whichever is longer; and

- B) Porous or absorbent materials, such as cloth, leather, wood or rope will not be degreased; and
- C) Not more than half of the degreasing unit's open top area will be occupied with a workload; and,
- D) The degreasing unit will not be loaded to the point where the vapor level would drop more than ten (10) centimeters (4 inches) when the workload is removed from the vapor zone; and,
- E) Always spray below the vapor level; and,
- F) Operate the degreasing unit so as to prevent water from being visually detectable in solvent exiting the water separator; and,
- G) When the cover is open, do not expose the open top vapor degreaser to drafts greater than forty 40 meters/minute (131 ft./min.), as measured between 1 and 2 meters upwind and at the same elevation as the tank lip, nor provide exhaust ventilation exceeding twenty (20) cubic meters per minute per square meter (65 cubic feet per minute per square foot) of degreasing unit open area, unless necessary to meet OSHA requirements.

9) In addition to the requirements stipulated in paragraphs six (6) through eight (8) of this Order, all degreasing units to which paragraph six (6) through eight (8) apply shall also conform to the following:

- A) No degreasing unit shall operate upon the occurrence of any visible solvent leak until the leak is repaired; or the parts washer will be emptied of solvent and shut down.
- B) The Company shall provide a permanent, conspicuous label on or posted near each degreasing unit summarizing the applicable operating requirements presented in this Order and Subsection 22a-174-20(1) of the Regulations.



- C) Any solvent spilled during transfer, either from the dispensing area or to any degreasing unit, shall be wiped up upon occurrence, and the wipe rags subsequently stored in a closed container until proper disposal.
- D) Waste solvent will only be stored in covered containers and not disposed of, or transferred to another party, such that greater than twenty (20) percent of the waste solvent (by weight) can evaporate into the atmosphere.

10) The Company uses one-half (1/2) gallon cans containing the exempt VOCs 1,1,1 Trichloroethane and, beginning January 1, 1989, Freon TMC, to dip clean small parts at work benches. The Company agrees not to convert to the use of a VOC for hand wiping at any time in the future. Freon TMC will be utilized in all hand wiping where the VOC Freon TC-7 was formerly utilized beginning January 1, 1989.

11) Any new degreasing units using a VOC which may be installed at any time in the future and which do not meet the conditions which would require the Company to file for a permit, shall meet the requirements for degreasing equipment in Subsection 22a-174-20(1) of the Regulations and paragraphs six (6) through nine (9) of this Order.

12) In addition to the above described degreasing units the Company operates five (5) solvent recovery stills. Two (2) of the stills are centrally located and are used to recover the solvents Freon TMC, Freon TF and 1,1,1 Trichloroethane from a number of degreasing units. These solvent recovery stills are identified by DEP Nos. D-110-1 and D-110-2. These two solvent recovery stills have previously been utilized to recover the VOC Freon TC-7. Beginning January 1, 1989 the Company will discontinue the use of Freon TC-7 permanently replacing this solvent with the exempt VOC Freon TMC. The provisions of this paragraph shall not be applicable to DEP Unit Nos. D-110-1 and D-110-2. The Company agrees that at no time after January 1, 1989 will these solvent recovery stills be utilized to recover a VOC. The remaining three (3) solvent recovery stills are located on the three (3) Perchloroethylene degreasing units, DEP Nos. D-101, D-108 and D-109. The following requirements apply to the three (3) solvent recovery stills recovering VOCs and to any new solvent recovery stills used to recover a VOC at any time in the future:

- i) The Company shall cease operation of any solvent recovery still whenever the condensate return temperature exceeds 38°C (100.4°F). This is the temperature above which the solvent recovery still is achieving less than the minimum required ninety-five (95) percent solvent recovery rate. The condensate return temperature on each solvent recovery still shall be monitored through the installation of an alarm which will be triggered should the condensate return temperature exceed the maximum necessary to achieve the minimum ninety-five (95) percent solvent recovery rate. The monitoring records will be kept on site for a minimum of two years. The monitoring records shall be made available to this Department upon request.
- ii) All waste VOC, before being recovered in the solvent recovery stills or before being sent out as a waste product, must be stored in closed containers which prevent the evaporation of VOC to the atmosphere.

13) In addition to its degreasing operations, the Company utilizes fifteen (15) rust prevention dip tanks in thirteen (13) separate departments to coat interim and finished products prior to the next machining step or storage. The parts are coated with a blend of Mineral Spirits and a wax in solution. Twelve (12) of these tanks are five (5) to fifteen (15) gallon capacity units operated manually. One additional manual tank, planned for use in 1989, has a capacity of fifty (50) gallons. The two remaining tanks are automatic tanks each capable of holding 280 gallons of solvent/wax blend.

In addition to the recordkeeping requirements outlined in the Compliance Timetable, the following operational requirements apply to these fifteen (15) units. The twelve (12) five to fifteen gallon tanks and the one (1) fifty gallon tank will be covered whenever not in use for greater than five (5) minutes. The two (2) automatic tanks will be covered at the end of each production period and will remain covered until the next production period begins. This Department has accepted this RACT determination for these rust prevention dip units because of the low volatility of

the Mineral Spirits utilized, five (5) millimeters of mercury measured at 38°C (100°F). The Company agrees not to convert to the use of a VOC with vapor pressure in excess of five (5) millimeters of mercury measured at 38°C (100°F) in any of the rust prevention dip tanks at any time in the future.

14) The Company presently blends waste Mineral Spirits with No. 6 fuel oil and disposes of this material through burning in the Company's boilers. The Company has chosen, in lieu of demonstrating a minimum ninety (90) percent destruction efficiency for the VOC burned, to discontinue this practice of burning waste VOC. At no time, after January 1, 1989, will the Company dispose of VOC through burning in the plant boilers.

15) Fulfill Monitoring and Recordkeeping requirements as noted by the Compliance Timetable.

16) Continued operation in compliance with the applicable provisions of Subdivisions 22a-174-20(f)(2) and 20(f)(4) of the Regulations.

17) The implementation of these RACT determinations does not excuse the Company from compliance with any source-specific VOC emission limitations which may be adopted at any future time nor does it exempt any VOC emission from compliance with Section 22a-174-29 of the Regulations concerning Hazardous Air Pollutants.

It is acknowledged that failure to demonstrate continued compliance with the terms and conditions set forth in the Compliance Timetable may constitute a violation of the Regulations of this Department and may subject the Company to further enforcement action including but not limited to liability for civil penalty assessments up to \$25,000 plus up to \$1000 per day pursuant to Section 22a-6b(a)(3) of the Connecticut General Statutes and Section 22a-6b-603 of the Department's Regulations.

Failure to submit a satisfactory Progress Report by the date(s) set forth in the Compliance Timetable may subject the Company to liability for civil assessments pursuant to Section 22a-6b(a)(3) of the Connecticut General Statutes and Section 22a-6b-601 of the Department's Regulations. Departmental action under this authority in no way prevents the Commissioner from seeking, in addition or separately, an injunction enforcing this

Stanadyne, Inc.  
Windsor, Connecticut


- 12 -

State Order No. 8018  
December 14, 1988

State Order together with penalties of up to one thousand dollars (\$1,000) for each offense in court proceedings under Section 22a-180 of the Connecticut General Statutes.

Questions concerning the terms of this Order should be addressed to Robin W. Bray, Senior Environmental Analyst, Administrative Enforcement, Air Compliance Unit, telephone 566-8230. Any future correspondence should make reference to State Order No. 8018.

Entered as a final decision of the Commissioner of Environmental Protection this 3 day of January, 1989.

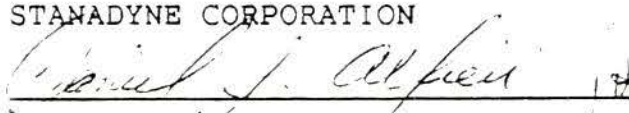
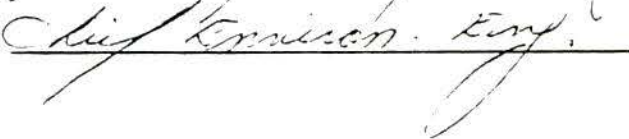
  
Leslie Carothers  
Commissioner  
Dept. of Environmental Protection

As a duly authorized representative of Stanadyne, Inc., I hereby consent to the terms and conditions of this order and do hereby waive the right to appeal this order pursuant to Subsection 22a-174-12 (b)(4) of the Regulations this \_\_\_\_\_ day of \_\_\_\_\_ 1988.

STANADYNE CORPORATION

By:

Title:

LC

Enc.

## COMPLIANCE TIMETABLE

TYPE OF SOURCE:

MAJOR

MINOR

PROCEDURAL

OTHER

PRIME CONTACT: Daniel Alfieri	SOURCE NAME: Stanadyne, Inc.
TITLE OF CONTACT PERSON: Chief Environmental Engr.	
SOURCE ADDRESS: 92 Deerfield Road Windsor, Ct. 06095	PREMISE NO.: 212-004 CLIENT NO.: 000108
	ORDER NO.: 8018 DATE ISSUED: 12/14/88
TELEPHONE NO.: 525-0821	N.V. NO.: 11062 DATE ISSUED: 9/8/86
VIOLATION SUBSECTION: 22a-174-20(ee)	EQUIPMENT TYPE: Degreasing Units, Rust Prevention Dip Tanks & Hand Wiping
	REG. NO.: INSPECTOR AND NO.: M.C. - #80

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER
	<p>The implementation of RACT for the Company's twenty-four (24) degreasing units, fifteen (15) rust prevention dip tanks and hand-wiping, is contingent upon demonstrated adherence to the following emission limitations, and monitoring and recordkeeping provisions. All records required by this Compliance Timetable shall be kept on file for a period of three (3) years and submitted or made available immediately to the Commissioner.</p> <p>The Company shall monitor the twenty-four (24) degreasing units, fifteen (15) rust prevention dip tanks and hand wiping in the manner described by this Compliance Timetable and as further described within State Order No. 8018. The following conditions apply to the above equipment until such time as this Order may be amended or otherwise altered in a manner approved by the Commissioner.</p> <p><u>VOC Emission Limitations and Recordkeeping Requirements</u></p> <p>1. The Company shall continue to use Mineral Seal Oil, which has a negligible volatility, in the Niagra Parts Washer (DEP No. D-121). The Company will continue to use the exempt solvents 1,1,1 Trichloroethane, Freon TF and Freon TMC in the eighteen (18) units identified by DEP Nos. D-102, D-103, D-104, D-105, D-106, D-107, D-111, D-112, D-113, D-114, D-115, D-116, D-117, D-118, D-119, D-120, D-123 and D-124. The Company agrees that at no time in the future will the eighteen (18) degreasing units utilizing exempt solvents be converted to the use of a VOC, or will the Niagra parts washer be converted to the use of a VOC with a vapor pressure exceeding 0.1 millimeters of mercury at actual operating conditions.</p>			

**COMPLIANCE TIMETABLE**

SOURCE NAME: Stanadyne, Inc.	PREMISE NO.: 212-004	CLIENT NO.: 000108
VIOLATION SUBSECTION: 22a-174-20 (ee)	ORDER NO.: 8018	DATE ISSUED: 12/14/88

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER
	<p>These degreasing units are further described in Tables A and B hereby incorporated by reference into this Order.</p> <p>The Company shall continue to use the exempt VOCs Freon TMC and 1,1,1 Trichloroethane in hand wiping. The Company agrees that at no time in the future will a VOC be utilized in hand wiping functions.</p> <p>2. The Company shall adhere to a maximum annual actual allowable limitation on total VOC emissions of 256.8 tons as described in Tables C and D hereby incorporated by reference into this Order, for the five (5) remaining degreasing units and fifteen (15) rust prevention dip tanks. Any changes in VOC emissions from the degreasers will be tracked in Appendix A and attached to this Compliance Timetable when necessary. Compliance shall be verified based upon the following recordkeeping requirements:</p> <p>A) The Company shall maintain a recordkeeping system for the total monthly usages of the VOCs Perchloroethylene and Mineral Spirits utilized in the degreasing units identified by DEP Nos. D-101, D-108, D-109, and D-122. Records shall be maintained separately for each unit and the usages reported in gallons added per month. Recordkeeping for the VOC Perchloroethylene utilized in degreasing unit DEP No. D-125 will be maintained on an annual basis. The Company agrees that at no time in the future will a VOC with a volatility greater than five (5) millimeters of mercury measured at 100° F be utilized in Unit D-122.</p> <p>B) The Company shall maintain a recordkeeping system for the total monthly usage of the VOC Mineral Spirits utilized in the fifteen (15) rust prevention dip tanks. Combined total monthly usage of Mineral Spirits will be monitored and recorded as measured from the Company's central dispensing point for the thirteen (13) manually operated rust prevention dip tanks. This Department has accepted this recordkeeping system for these thirteen (13) units because of the small quantities utilized in each tank. The two (2) automatic rust</p>			

## COMPLIANCE TIMETABLE

SOURCE NAME: Stanadyne, Inc.	PREMISE NO.: 212-004	CLIENT NO.: 000108
VIOLATION SUBSECTION: 22a-174-20(ee)	ORDER NO.: 8018	DATE ISSUED: 12/14/88

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER
	<p>prevention dip tanks are filled from a separate storage tank and will be monitored through additions to this storage tank. Usages shall be reported in total gallons dispensed for all units combined per month for the thirteen (13) manually operated units and for the total combined usage for the two (2) automatic units as dispensed from the storage tank. The fifteen (15) rust prevention dip tanks will be marked with DEP identification numbers D-126 through D-140. These numbers shall be utilized on all reporting forms. The Company agrees that at no time in the future will a VOC with a volatility greater than five (5) millimeters of mercury measured at 100°F be utilized in the fifteen (15) rust prevention dip tanks.</p> <p>C) The Company shall maintain a recordkeeping system for the combined waste VOC from the five (5) degreasing units described in paragraph 2A and for all rust prevention dip tanks combined as described in paragraph 2B, which is brought to storage for either recycling or to be manifested as waste. The solvent portion of the amounts recorded will be subtracted from the VOCs recorded in Steps 2A and 2B.</p> <p>D) The Company will submit a quarterly summary of total VOC usage in gallons on a per unit basis for those degreasing units identified in paragraph 2A and for the rust prevention dip tanks combined as described in paragraph 2B. Usages shall also be expressed in tons of VOC.</p> <p>E) The Company will submit a quarterly summary of total waste VOC expressed in gallons and tons which is brought to storage for either recycling or to be manifested as waste. Recordkeeping will be completed for all degreasing units combined as identified in paragraph 2A and for the rust prevention dip tanks combined as described in paragraph 2B.</p> <p>F) Quarterly reports shall be submitted on April 30, 1989, July 30, 1989 and October 30, 1989.</p>			

## COMPLIANCE TIMETABLE

SOURCE NAME: Stanadyne, Inc.	PREMISE NO.: 212-004	CLIENT NO.: 000108
VIOLATION SUBSECTION: 22a-174-20(ee)	ORDER NO.: 8018	DATE ISSUED: 12/14/88

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER
	<p>G) Although no longer required to be submitted to the Department after October 30, 1989, the quarterly reports shall be maintained and kept on file at the Company for Departmental review or submittal upon request.</p> <p>3. Any changes or proposed changes in VOC content of solvents shall be reported to the Department upon occurrence.</p> <p>4. The Company shall submit a complete detailed record of total VOC usage and emissions using the identical recordkeeping system which is required for the quarterly reports for the most recent year completed (January 1 - December 31) whenever a Pre-Inspection Questionnaire is submitted to the Department.</p> <p>5. If any of the five (5) degreasing units or fifteen (15) rust prevention dip tanks which currently use VOCs and which are limited by this Order, are permanently shut down, the maximum annual allowable VOC limitation shall be reduced accordingly by the number of degreasing units which have actually shut down. (Refer to Tables C and D for the reduction).</p>			