



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
ATTACHMENT #1



|                                   |   |                             |
|-----------------------------------|---|-----------------------------|
| STATE OF CONNECTICUT              | ) |                             |
| DEPT. OF ENVIRONMENTAL PROTECTION | ) |                             |
|                                   | ) | <u>STATE ORDER NO. 8023</u> |
| VS.                               | ) |                             |
|                                   | ) | Proposed; January 20, 1988  |
| GENERAL MOTORS CORPORATION        | ) | Final; May 31, 1988         |
| DETROIT, MICHIGAN                 | ) |                             |

WHEREAS, New Departure Hyatt, Div. of General Motors, (hereinafter the "Company") owned by General Motors Corporation, Detroit, Michigan and doing business on 780 James P. Casey Road, Bristol, Connecticut, operates fifteen (15) cold, conveyorized parts washers, eleven (11) cold cleaners, and a cold parts cleaning spray booth subject to the standards and limitations of the Administrative Regulations for the Abatement of Air Pollution (hereinafter "Regulations"); and

WHEREAS, the fifteen (15) cold, conveyorized parts washers are subject to Section 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 Connecticut Administrative Regulations for the Abatement of Air Pollution, of Volatile Organic Compounds (VOC) are greater than one hundred (100) tons per year. The discharges of volatile organic compound emissions are required to be limited by RACT by 12/31/85 unless a compliance plan is filed under Section 22a-174-20(ee)(3); and

WHEREAS, the eleven (11) cold cleaners and the cold parts cleaning spray booth are subject and continue to be subject to the requirements of Section 22a-174-20(1) of the Regulations.

WHEREAS, documentation obtained through a plant inspection by the Department of Environmental Protection indicates that "actual" emissions exceed one hundred (100) tons per year of VOC's at New Departure Hyatt, Div. of General Motors; and

WHEREAS, the Commissioner of the Department of Environmental Protection (hereinafter "Commissioner") issued Notice of Violation No. 10824 to the Company on February 20, 1986 in view of the December 31, 1985 deadline imposed by the Administrative Regulations for the Abatement of Air Pollution for compliance with Section 22a-174-20(ee) of the Regulations; and

WHEREAS, the Company has proposed RACT for the fifteen (15) cold, conveyorized parts washers 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 Section 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 New Departure Hyatt, Div. of General Motors to complete the following measures, as further delineated by the Compliance Timetable which is hereby incorporated by reference in this Order. The applicable requirements are as follows:

- 1) The Company has fifteen (15) cold, conveyorized parts washers which were previously exempted from Section 22a-174-20(1) of the Regulations because they were installed prior to 1980.
- 2) Eleven (11) of the fifteen (15) parts washers which previously used the VOC, Amsco Mineral Spirits 66/3, have been converted to Mineral Seal Oil which has a negligible volatility. Therefore, Section 22a-174-20(1) no longer applies. The parts washers are identified by Vent #5A (2 washers), 8A, 9A (2 washers), 10A, 13A, 14A and 73A (3 washers). If the Company ever proposes returning to a VOC with a vapor pressure greater than 0.1 millimeters of mercury at 20° Celsius again in any of the eleven (11) parts washers, the Department shall be notified in writing in advance. Any part washer being considered for conversion back to using a VOC with a vapor pressure greater than 0.1 millimeters of mercury at 20° Celsius must meet the requirements of Section 22a-174-20(1) of the Regulations concerning cold, conveyorized degreasers on the day it starts production. Recordkeeping of the VOC's will also be required upon startup and the VOC emissions shall be included in the monthly record totals of VOC's.



The above requirements also apply to the two (2) Branson Ultrasonic Cleaners (#5A and B23) which use an exempted Freon.

- 3) The remaining four (4) cold conveyerized parts washers in Table A (Vents 6A (2 washers), 81A and 18x) have been permanently shutdown. These four (4) degreasers shall remain shutdown after the effective date of this order. The eleven (11) cold cleaners and the cold parts cleaning spray booth in Table D which use the VOC Amsco Mineral Spirits 66/3 shall comply specifically with the requirements described below.

A) The eleven (11) cold cleaners shall spray the VOC in a solid fluid stream if applicable (some units dip only) (not a fine, atomized or shower type spray) at a pressure which does not exceed 10 pounds per square inch as measured at the pump outlet. All such spraying shall be performed only within the confines of the cold cleaner. The cold parts cleaning spray booth has been exempted from this requirement due to the stringent cleaning requirements necessary for the bearings cleaned in this manner and the low usage of VOC to perform this operation (2 gallons per day maximum).

B) Store waste degreasing solvent from the eleven (11) cold cleaners and the cold parts cleaning spray booth only in covered containers and do not dispose of waste degreasing solvent or transfer it to another party, such that greater than twenty (20) percent of the waste degreasing solvent (by weight) can evaporate into the atmosphere.

C) The eleven (11) cold cleaners and the cold parts cleaning spray booth shall have a cover which shall be closed while parts are either sitting in the VOC for two (2) minutes or greater and when the unit is not in use.

D) The eleven (11) cold cleaners and the cold parts cleaning spray booth shall drain cleaned parts for a minimum of fifteen (15) seconds or until dripping ceases, whichever is longer.

- E) No parts washer shall operate with any visible solvent leak until the leak is repaired; or the parts washer will be emptied of solvent and shut down.
- F) The Company shall provide a permanent, conspicuous label on or posted near each degreaser summarizing the operating requirements presented in paragraph three of this order and Section 22a-174-20(1) of the Regulations.
- G) Any solvent spilled during the transfer either from the dispensing area or to any parts washer should be wiped up upon occurrence, and the wipe rags subsequently should be stored in a closed container until proper disposal.
- H) The temperature of the solvent in every parts cleaner shall always be maintained below 100°F.
- I) The Company shall minimize the drafts across the top of open cold cleaners such that each cold cleaner 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.
- 4) Fulfill Monitoring and Recordkeeping requirements as noted by the Compliance Timetable.
- 5) Continued operation in compliance with the applicable provisions of Section 22a-174-20(f)(2) and 20(f)(4) of the Regulations.
- 6) The implementation of these RACT determinations does not excuse the source 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.



- 7) In addition to any requirements contained in paragraph 3 of this Order for the eleven (11) cold cleaners and the cold parts cleaning spray booths; the eleven (11) cold cleaners and the cold parts cleaning spray booth at New Departure Hyatt continue to be subject to the applicable requirements contained in subsection 22a-174-20(1) of the Regulations. Furthermore, this Order does not relieve New Departure Hyatt from compliance with any of those requirements in subsection 22a-174-20(1) for any period of time after the applicable final compliance date contained in section 22a-174-8 of the Regulations.
- 8) Any new vapor degreasers or cold cleaners using a VOC which may be installed at a future date and which do not meet the conditions which would require the Company to file for a permit, shall meet the requirements for open top vapor degreasers or cold cleaners in Section 22a-174-20(1) of the Regulations and paragraph three (3) of this order.
- 9) The Company uses five (5) gallon cans containing a VOC to dip clean small parts at work benches. These cans shall remain covered when not being used or when a part is sitting in the VOC for two (2) minutes or greater.
- 10) If a cold cleaner is ever converted to a solvent having a vapor pressure greater than 33 millimeters of mercury measured at 100°F it shall be fitted with one of the following control devices:
  - A) a freeboard that gives a freeboard ratio greater than or equal to 0.7; or
  - B) a water cover (solvent must be insoluble in and heavier than water; or
  - C) an other system of equivalent control, such as a refrigerated chiller or carbon adsorption unit.

It is acknowledged that failure to demonstrate continued compliance with the terms and conditions set forth in the Compliance Timetable (which is hereby incorporated, by reference, to this Order) 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 New Departure Hyatt, Div. of General Motors to liability for civil assessments pursuant to Section 22a-6b (a)(3) of the 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 State Order together with penalties of up to five thousand dollars (\$5,000) per week in court proceedings under Section 22a-180 of the General Statutes.

Entered as a final decision of the Commissioner of Environmental Protection this 7 day of June, 1988.

  
Leslie Carothers  
Commissioner  
Dept. of Environmental Protection

As a duly authorized representative of New Departure Hyatt, Div. of General Motors, I hereby consent to the terms and conditions of this order and do hereby waive the right to appeal this order pursuant to Section 22a-174-12 (b)(4) of the Regulations this 8 day of July 1988.

GENERAL MOTORS CORPORATION

By:   
Title: ND Bearings Director Plant Manager

LC

Enc.



**COMPLIANCE TIMETABLE**TYPE OF SOURCE:  MAJOR  MINOR  PROCEDURAL  OTHER \_\_\_\_\_

|                          |   |                 |   |                      |
|--------------------------|---|-----------------|---|----------------------|
| PRIME CONTACT:           | David Senft                                     | SOURCE NAME:    | General Motors Corporation                                      |                      |
| TITLE OF CONTACT PERSON: | Plant Environmental Engr.                       | PREMISE NO.:    | 026-019   | CLIENT NO.: (000507) |
| SOURCE ADDRESS:          | 780 James P. Casey Road<br>Bristol, Connecticut | ORDER NO.:      | 8023  | DATE ISSUED: 5/31/88 |
| TELEPHONE NO.:           | 584-3143  | N.V. NO.:       | 10824   | DATE ISSUED: 2/20/86 |
| VIOLATION SUBSECTION:    | 22a-174-20(ee)                                  | EQUIPMENT TYPE: | Fifteen (15) Parts Washer<br>Twelve (12) cold parts<br>cleaners |                      |
|                          |   | REG. NO.:       | INSPECTOR AND NO.: P.S.-#1                                      |                      |

| STEP | EVENTS LEADING TO COMPLIANCE  | TIMETABLE | COMPLETED | V |
|------|---|-----------|-----------|---|
|      | <p>The implementation of RACT for New Departure Hyatt, Div. of General Motors Company's fifteen (15) cold conveyORIZED parts washers, 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>New Departure Hyatt, Div. of General Motors shall monitor the fifteen (15) cold, conveyORIZED parts washers in the manner described by this Compliance Timetable and as further described within State Order No. 8023. 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 of Environmental Protection.</p> |           |           |   |
| 1.   | <p>The Company shall continue using Mineral Seal Oil, which has a negligible volatility, in the eleven (11) parts washers which previously used Amso Mineral Spirits 66/3 and the six (6) additional product washers as listed in Table B which currently use mineral seal oil. If the Company ever proposes returning to a Volatile Organic Compound (VOC) again in any of the seventeen (17) parts washers listed in Table B, the Department shall be notified in writing in advance. Any part washer being considered for conversion back to using a VOC must meet the requirements of Section 22a-174-20(1) of the <u>Regulations</u> concerning cold, conveyORIZED degreasers on the day it starts production. Recordkeeping of</p>  | 12/31/87  |           |   |

## COMPLIANCE TIMETABLE

|  |                             |                             |
|--|-----------------------------|-----------------------------|
| SOURCE NAME: <b>General Motors Corporation</b> | PREMISE NO.: <b>026-019</b> | CLIENT NO.: <b>000507</b>   |
| VIOLATION SUBSECTION: <b>22a-174-20 (ee)</b>   | ORDER NO.: <b>8023</b>      | DATE ISSUED: <b>5/31/88</b> |

| STEP | EVENTS LEADING TO COMPLIANCE   | TIMETABLE                      | COMPLETED | V |
|------|--|--------------------------------|-----------|---|
|      | <p>the VOC emissions shall be included in the monthly record totals of VOC's. The parts washers are identified by Vent #5A (2 washers), 8A, 9A (2 washers), 10A, 13A, 14A, 73A (3 washers), D-18 (3 washers), 19x, E-17 and D-17. If the above degreasers do return to using Amsco Mineral Spirits or any other VOC, the VOC emissions from this equipment shall be included in their VOC emissions recordkeeping system for determining compliance with this order. The above requirements also apply to the two (2) Branson Ultrasonic Cleaners as listed in Table C which currently use an exempted Freon.</p>  |                                |           |   |
| 2    | <p>The Company shall adhere to a maximum annual actual allowable limitation on total Volatile Organic Compound (VOC) emissions of 27 tons as described in Table D for the eleven (11) cold cleaners and the cold parts cleaning spray booth. This figure may vary in the future due to production changes. Increases in the maximum annual VOC emissions if they occur, will be tracked in Appendix A, which will be attached to the Compliance Timetable when necessary. Compliance shall be verified based upon the following recordkeeping requirements:</p> <p>A) The Company shall maintain a recordkeeping system of all adds to each cold cleaner and the cold parts cleaning spray booth in Table D. This record shall include the date of the add and the amount in gallons.</p> <p>B) The Company shall maintain a recordkeeping system for all waste VOC from each cold cleaner and the cold parts cleaning spray booth which is brought to storage for either recycled or to be manifested as waste. The amounts recorded will be subtracted from the VOC's recorded in Step 2A.</p> <p>C) Submit a quarterly summary of total VOC usage in gallons on a per cold cleaner and per cold parts cleaning spray booth basis and also expressed in tons of VOC.</p> | <p>7/15/88</p> <p>10/15/88</p> |           |   |



**COMPLIANCE TIMETABLE**

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|--|-----------------------------|-----------------------------|
| SOURCE NAME: <b>General Motors Corporation</b> | PREMISE NO.: <b>026-019</b> | CLIENT NO.: <b>000507</b>   |
| VIOLATION SUBSECTION: <b>22a-174-20 (ee)</b>   | ORDER NO.: <b>8023</b>      | DATE ISSUED: <b>5/31/88</b> |

| STEP | EVENTS LEADING TO COMPLIANCE   | TIMETABLE | COMPLETED | VE |
|------|--|-----------|-----------|----|
|      | <p>D) Submit a quarterly summary of total waste VOC from the cold cleaners and parts cleaning spray booth in gallons which is brought to storage or to be manifested as waste or recycled and also expressed in tons of VOC.</p> <p>E) Quarterly reports shall be submitted on July 15, 1988, October 15, 1988 and January 15, 1989.</p> <p>F) Although no longer required to be submitted to the Department after January 15, 1989 the quarterly reports shall be maintained and kept on file at the Company for Departmental review or submittal upon request.</p> |           |           |    |
| 3    | Any changes or proposed changes in VOC content of the parts washing solvent shall be reported to the Department upon occurrence.   |           |           |    |
| 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.   |           |           |    |
| 5    | If any of the eleven (11) cold cleaners or the cold parts cleaning spray booth which currently use VOC 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 cold cleaners that have actually shut down. (Refer to Table D for the reduction).   |           |           |    |