

## MEMORANDUM

SUBJECT: National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning

FROM: Scott Throwe, Branch Chief  
Chemical Industry Branch

TO: Nhien Pham  
Nidhi O'Meara

We welcome the opportunity to assist you in monitoring compliance with Subpart T, the national emission standards for halogenated solvent cleaning. As discussed in a recent conversation with my staff, guidance is needed to evaluate compliance with the equipment standards for batch cold cleaning machines. Specifically, you requested guidance on determining compliance with §63.462(a)(1).

Owner or operators of an immersion batch cold solvent cleaning machine complying with §63.462(a)(1) must employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine. To determine the thickness of the water layer on the surface of the solvent, a clear pipette may be immersed and extended beyond the solvent-water interface. Once the pipette has been immersed, plug the end of the pipette to prevent any air from entering the top of the pipette and remove the pipette from the machine. A visual inspection of the contents inside the pipette will enable you to determine the water layer thickness.

Please contact Tracy Back at (202) 564-7076 with any further questions regarding Subpart T.