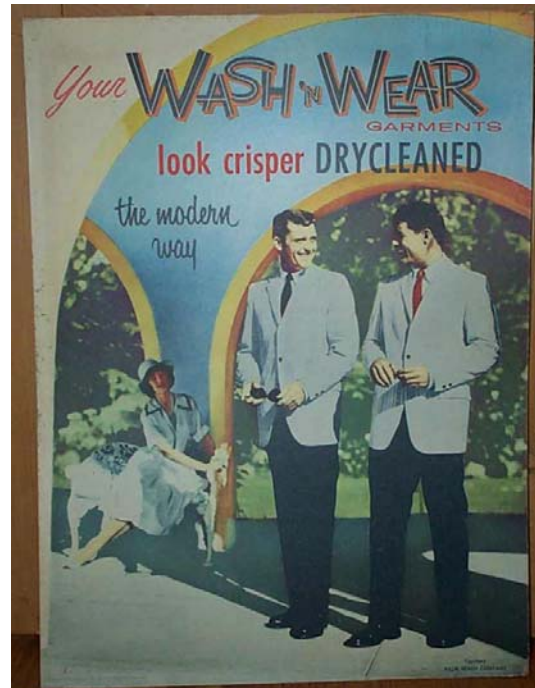


# *Perchloroethylene Dry Cleaning*

## ***Air Toxics Standards Review***



# *Clean Air Act Mandates*

- **Technology-based standards (MACT / GACT)**
  - Set in 1993
  - Reduced perchloroethylene (perc) emissions by 5,000 tons per year
  - Covers about 28,000 sources nationwide

# *Clean Air Act Mandates*

**The Act now requires 2 reviews:**

## **1. Technology review**

- Review and revise standards if necessary considering developments in emission control practices
- Every 8 years

# *Clean Air Act Mandates*

## **2. Risk review**

- Assess risks remaining after the 1993 standards
- Reduce risks if necessary to protect public health
- *Required* for sources with MACT
- *Discretionary* for sources with GACT
- No requirement to repeat review

# *How the Reviews Work*

## **1. Technology review**

- Investigate whether additional methods for emissions control are available
- Completed for all sources, MACT and GACT

# *How the Reviews Work*

## **2. Residual Risk review**

- Conduct a risk assessment to determine exposures and risks
- Determine whether risks are within an “ample margin of safety”
- Take actions to reduce risks if necessary

# *Rule Timeline*

- EPA *proposed* rule on December 9, 2005
  - December 21, 2005 (70 FR 75884)
- EPA *finalized* the rule on July 13, 2006
  - July 27, 2006 (71 FR 42724)
- EPA issued a corrections notice
  - September 21, 2006 (71 FR 55280)
- We expect EPA to issue a direct final rule in August 2007
  - September 21, 2006 (71 FR 55280)
- EPA website: [www.epa.gov/drycleaningrule](http://www.epa.gov/drycleaningrule)

# *Planned Direct Final Rule Changes*

- Clarify that colorimetric monitoring is not required for area sources
- Provide alternatives to using a pressure gauge to monitor condenser performance

# *Petitions from Enviros and Industry*

- **Sierra Club**
  - Filed a Petition for reconsideration to change certain aspects of the rule
    - Ban perc use at all drycleaners
    - Speed up the perc phase-out at “co-res” drycleaners
  - We denied this petition
- **Industry and the Sierra Club**
  - *Filed petitions for Judicial review*
  - Court has yet to respond
- ***Until issues are resolved, rule stands***

# *Perchloroethylene Drycleaners - Background*

- ~34,000 drycleaners in the US
- ~28,000 use perc
- 3 types of perc drycleaners:
  - Large industrial & commercial (12)
  - Small ‘typical’ (~27,000)
  - Small located in apt bldgs - (~1300)
    - “Co-residential” (1100 of which are in NYC)

# *Final Rule Summary*

- **Major Source drycleaners**
  - New and existing must conduct leak detection and repair (LDAR) with high-end equipment

# *Final Rule Summary*

- **Area Source ‘typical’ facilities**
  - ***Existing:***
    - Eliminate all transfer machines
    - Conduct LDAR with less expensive detectors than large sources
  - ***New:***
    - Conduct LDAR with less expensive detectors than large sources
    - Install Generation 4 machines

# *Final Rule Summary*

- **Apartment dry-cleaners**
  - No new perc machines;
  - Phase out existing perc machines by 2020

# *Rule Requirements for Majority of Sources*

- **Existing Area Sources** (not co-residential)
  - Equipment practices
  - Work practices
  - Notification of compliance

# *Area Source Equipment Practices*

- Termination of transfer machines
- Continue to use dry-to-dry machines
  - Generation 3 (venting machines)
  - Generation 4 (closed loop machines)
- 1993 rule requirements still apply

# *Area Source Work Practices*

## Halogenated Hydrocarbon Detector

- Monthly monitoring for equipment leaks
- Proper operation and maintenance
- Overall savings on solvent use
- Benefit to environment
- Technologically feasible

# *Area Source Work Practices*

- Halogenated Hydrocarbon Detector
  - Portable Device
  - Detects 25 PPM or greater by emitting an audible or visual signal that varies as the concentration changes

# *Area Source Work Practices*

- New Vapor Leak Definition
  - Rule considers perc concentrations exceeding 25 PPM to be a leak

# *Area Source Work Practices*

- Thrust of rule
  - Operator makes an effort to find leaks
  - Operator obtains proper device
  - Operator understands proper operation
  - Operator recognizes PCE savings

# *Expanded Compliance Notification*

- Due to permitting authority by **July 28, 2008**
  - Name, address of owner or operator and facility;
  - If they are located in a residential building;
  - If they are located in a building with no other tenants;

# *Compliance Notification*

- Whether they are a major or area source;
- Yearly perc consumption, calculated according to the rule;
- Whether or not they are in compliance with all the rule requirements
- Certification of Accuracy

## *For More Information*

- [www.epa.gov/drycleaningrule](http://www.epa.gov/drycleaningrule)
  - General Information, regulations, updates

# *National Contacts*

- **Technical Contact (OAQPS)**
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