Dry Cleaners and The Clean Air Act

Air Pollution Control Program fact sheet	02/2014
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Introduction

Many dry cleaning businesses use a solvent called perchloroethylene, or perc, which is a hazardous air pollutant. Perc is bad for the environment and can cause health problems such as neurological, liver and kidney damage. This publication concerns dry cleaners that use perc and whenever the term dry cleaner is used it means dry cleaners using perc.

Dry cleaners are required to meet the requirements in 40 CFR 63 Subpart M (referred to as Subpart M in this fact sheet). If they have the potential to generate enough air pollution, they may be required to have an air pollution permit.

Notifications

All facilities need to notify the Air Pollution Control Program they meet the Subpart M requirements within 30 days of starting operations. Fill out the <u>Dry Cleaner Notification of Compliance Status</u> form and mail a copy to the Air Pollution Control Program address provided on the form. You will also need to mail a copy to EPA. This is in addition to the notification requirements for the <u>Hazardous Waste Program</u>.

Classifications

EPA has divided perc drycleaning facilities into three classifications; small area sources, large area sources and major sources. There are different requirements for each of the classifications, based on how much perc the facility purchases in 12 months.

Table 1: Perchloroethylene Dry Cleaner Classifications

Facilities with:	Small Area Source	Large Area Source	Major Source
Only Dry-to-Dry machines	Purchase less than 140 gallons per year	Purchase 140 to 2,100 gallons per year	Purchase more than 2,100 gallons per year

Rules and Regulations

There are rules and regulations issued by EPA perc dry cleaning facilities must follow to remain in compliance. The current Subpart M regulations include but are not limited to the following requirements:

- No perc transfer machines.
- Maintain records of perc purchases and perc consumption (12 month rolling total).
- All major source dry cleaners shall have an enhanced leak detection and repair (LDAR) program, which includes the use of a perc gas analyzer to perform monthly leak checks according to
 EPA Method 21. Perceptible leak checks are required weekly. Maintain an inspection log (See the <u>Dry Cleaner Calendar</u>).
- All area source dry cleaners shall have an enhanced LDAR program, which includes the use of a halogenated hydrocarbon leak detector, or perc gas analyzer, to perform monthly leak checks. Perceptible leak checks are required every week for large area sources and every other week for small area sources. Maintain an inspection log (See the <u>Dry Cleaner Calendar</u>).

Note: Small area source dry cleaners with no construction or reconstruction before Dec. 9, 1991 are not required to perform the monthly leak detection with a halogenated hydrocarbon leak detector, or perc gas analyzer.

- · Inspection with a halogenated hydrocarbon leak detector, or perc gas analyzer, also fulfills the requirement for perceptible leak checks.
- · Maintain a log of refrigerated condenser temperature check weekly.
- When carbon adsorber is required, maintain a log of carbon adsorber perc concentration check weekly.
- · Operate and maintain control equipment per procedures specified in Subpart M and per manufacturer's instructions.
- · Leak detection equipment shall be operated according to the manufacturer's instructions.
- All area source dry cleaners, starting construction or reconstruction after Dec. 21, 2005, shall use only non-vented, dry-to-dry machines with a refrigerated condenser and secondary carbon adsorber or equivalent control devices.
- All Subpart M sources must submit a Notification of Compliance report, within 30 days of commencing operation, to the Air Pollution Control Program, EPA and, if applicable, your local air agency. The Notification of Compliance must be certified and include information listed in 40 CFR §63.324(f).
- · All perc and perc-containing waste shall be stored in non-leaking containers.
- Use pollution prevention procedures to prevent liquid and vapor leaks of perc.

Three main requirements for co-residential area sources:

- 1. Dry cleaning systems located in residential buildings must abide by the same rules as all other area sources until Dec. 22, 2020, when all perc machines in co-residential area sources are prohibited.
- 2. Dry cleaning systems installed after Dec. 21, 2005 in residential buildings cannot use perc. This applies to new machines or relocated from existing facility.
- 3. The Notification of Compliance report must notify if the dry cleaning facility is located in a building with a residences, even if the residence is vacant at the time of this notification.

Hazardous Waste

Operators of an active dry cleaning facility are required to register within 30 days of operation with the Missouri Department of Natural Resources' Hazardous Waste Program, as outlined in 10 CSR 25-17.030. Each active dry cleaning facility is required to pay an annual registration surcharge based upon the number of gallons of chlorinated solvents used during the calendar year, as outlined in 10 CSR 25-17.030. Submittal of the Dry Cleaner Registration form and surcharge before April 1 of the calendar year will satisfy these requirements. For more information, see the <u>DERT</u> webpage.

To find out more about perc dry cleaning alternatives, or for more information about dry cleaning compliance, refer to <u>www.epa.gov/ttn/atw/dryperc/dryclpg.html</u> or contact the department's Air Pollution Control Program at 573-751-4817.

Nothing in this document may be used to implement any enforcement action or levy any penalty unless promulgated by rule under chapter 536 or authorized by statute.

For more information Missouri Department of Natural Resources Air Pollution Control Program P.O. Box 176 Jefferson City, MO 65102-0176 573-751-4817 or 573-751-2706 http://www.dnr.mo.gov/env/apcp