

Air Quality Regulations Affecting Petroleum Dry Cleaning Operations

Michigan Department of Environmental Quality • Office of Pollution Prevention & Compliance Assistance • 800-662-9278

Drycleaners that use petroleum based solvents are subject to different regulations than those that use perchloroethylene (perc). This fact sheet has been developed to help petroleum drycleaners understand the air quality regulations that may affect them.

If you have any questions about the requirements contained in this document please contact the Department of Environmental Quality (DEQ), Dry Cleaning Program at 800-662-9278.

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NEW SOURCE PERFORMANCE STANDARD (NSPS)

The NSPS is a federal regulation that was established to limit the emission of volatile organic compounds (VOCs) from petroleum drycleaners. The NSPS for drycleaners is located in Title 40, Part 60, Subpart JJJ (sections 60.620 - 60.625) of the Code of Federal Regulations (CFR). This regulation can be accessed on the Internet at www.epa.gov or by calling the Environmental Assistance Program at 800-662-9278.

A petroleum dry cleaning facility is subject to the NSPS if:

1. The TOTAL manufacturer's rated dryer capacity for the entire plant is equal to or greater than 84 pounds (38 kilograms);

AND

2. The equipment was installed after December 14, 1982.

If the dryer was installed between December 14, 1982 and September 21, 1984, in a plant with an annual solvent consumption level of less than 4,700 gallons (17,791 liters), the facility is not subject to the NSPS requirements.

Manufacturer's rated dryer capacity is the dryer's rated capacity of articles, in pounds or kilograms of clothing articles per load, dry basis, that is typically found on each dryer on the manufacturer's name-plate or in the manufacturer's equipment specifications. If the manufacturer's rated dryer capacity for all the dryers at the plant combined is equal to or greater than 84 pounds, then the source is subject to the NSPS.

NSPS Requirements

Sources subject to the NSPS must comply with the following requirements:

- The dryer must be a solvent recovery dryer.
- The filter must be a cartridge filter.
- You must drain the cartridge filters in their sealed housings for at least eight hours prior to their removal.
- The manufacturer of the petroleum solvent dryer should have included leak inspection and leak repair cycle information in the operating manual and on a clearly visible label posted on the dryer.
- You must perform an initial test to verify that the flow rate of recovered solvent from the solvent recovery dryer at the termination of the recovery cycle is no greater than 0.05 liters per minute. This test shall be conducted for a duration of no less than two weeks during which no less than 50 percent of the dry loads shall be monitored for their final recovered solvent flow rate.
- You need to maintain a copy of the initial performance test.

Initial Performance Test

The suggested point for measuring the flow rate of recovered solvent is the outlet of the solvent-water separator. Near the end of the recovery cycle, the entire flow of recovered solvent should be diverted to a graduated cylinder. As the recovered solvent collects in the graduated cylinder, the elapsed time is monitored and recorded in periods of greater than or equal to one minute. At the same time, the volume of solvent in the graduated cylinder is monitored and recorded to determine the volume of recovered solvent that is collected during each time period. The recovered solvent flow rate is calculated by dividing the volume of solvent collected per period by the length of time elapsed during the period and converting the result with appropriate factors into units of liters per minute. The recovery cycle and the monitoring procedure should continue until the flow rate of solvent is less than or equal to 0.05 liter per minute. The type of articles cleaned and the total length of the cycle should then be recorded.

PERMIT TO INSTALL

You are required to obtain a Permit to Install from the DEQ, Air Quality Division (AQD) prior to installing equipment that emits an air contaminant, unless that process or operation is specifically exempted from this requirement in the Michigan Air Pollution Control Rules.

Dry cleaning equipment with a capacity of 100 pounds or less of clothes is exempt from having to obtain a Permit to Install under R 336.1281(g) of the Michigan Air Pollution Control Rules. This means that if you have dry cleaning equipment with a capacity greater than 100 pounds, you need to obtain a Permit to Install from the AQD.

Permit to Install Requirements

- If you require a Permit to Install, you must complete the AQD Permit to Install application prior to installing the dry cleaning equipment. When you are issued the permit, it will contain conditions that you must comply with.

RENEWABLE OPERATING PERMIT (ROP)

Only “major sources” of air contaminants must obtain an ROP. A petroleum dry cleaning establishment would be considered “major” if it has the potential to emit over 100 tons of volatile organic compounds (VOCs) per year.

ROP Requirements

- If subject to the ROP program, you must submit an application for an ROP within one year after becoming subject. When you are issued an ROP, it will contain conditions that you must comply with.

AIR EMISSION REPORTING

The Clean Air Act requires that each state maintain an inventory of air emissions. In Michigan emission inventory data is collected through the Michigan Air Emissions Reporting System (MAERS). Petroleum dry cleaning establishments that are subject to the NSPS or the ROP Program must report their air emissions annually under MAERS.

MAERS Requirements

- Subject facilities will receive notice that they are subject to reporting every January. The MAERS report is due on March 15.

WHERE TO GO FOR HELP

- **DEQ, AQD Dry Cleaning Program**

Phone: 517-241-7463

Web site: www.michigan.gov/deqair (click on “Compliance” then “Michigan Dry Cleaning Program”).

- **DEQ, Environmental Assistance Program**

Phone: 800-662-9278

Web site: www.michigan.gov/deqair (click on “Clean Air Assistance”).

- **Michigan Institute of Laundering & Drycleaning (MILD)**

Phone: 517-327-9207

Web site: www.mildmi.org

The Michigan Department of Environmental Quality (MDEQ) will not discriminate against any individual or group on the basis of race, sex, religion, age, national origin, color, marital status, disability or political beliefs. Questions or concerns should be directed to the MDEQ Office of Personnel Services, P.O. Box 30473, Lansing, MI 48909.