OVERVIEW OF NEW YORK PERC DRY CLEANING REGULATIONS
FUTURE DIRECTION

NEWMOA Regional Meeting
Promoting Safer Garment Cleaning
Chelmsford, MA
December 2, 2014

History

• NESHAP for Perchloroethylene Dry Cleaners promulgated on 9/22/1993 with a compliance deadline of 9/23/1996.
• Extensive conversations with EPA during rule development. Final rule did not adequately address public health issues being observed in New York.
• 1994 New York begins a negotiated State rule-making process for this source category.
• 6 NYCRR Part 232 Perchloroethylene Dry Cleaning becomes effective on 5/15/1997.
Major Differences

- Vapor Barrier/Room Enclosure Requirements;
- Perc Dry Cleaning Machines - existing old machines must be replaced with modern 4th generation machines. These replacements were phased in over an eight year period ending in January 2005.
- Machines must meet NYS machine testing and certification requirements.
- Machine operators must be trained and certified;
- Hazardous waste management requirements;
- Yearly compliance inspection requirement;
- Posting notice.

History

- NESHAP for Perchloroethylene Dry Cleaners updated through Risk and Technology Review (RTR) process on 7/27/2006.
- Extensive conversations with EPA about the requirements and implementation of 6 NYCRR Part 232 and our public health surveillance data.
- Updated NESHAP reflects lessons learned by New York during State rule implementation.
New Wrinkles

• All perc machines installed prior to 12/21/2005 must be removed from residential buildings by 12/21/2020.
• No new perc machine installations in residential settings after 7/13/2006.
• Reporting requirements pertaining to compliance status for each DC (Form 232-11).

Monitored Indoor Air Concentrations

Average Monitored Exposure for Seven Regulatory Time Periods in New York State

<table>
<thead>
<tr>
<th>Time Period</th>
<th>Geometric Mean (µg/m³)</th>
<th>Standard Deviation (µg/m³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-NESHAP: before 1993</td>
<td>610</td>
<td>11</td>
</tr>
<tr>
<td>NESHAP: 1993 to 1997</td>
<td>507</td>
<td>8</td>
</tr>
<tr>
<td>Part 232: May to Nov. 1997¹</td>
<td>150</td>
<td>6</td>
</tr>
<tr>
<td>Part 232: Nov. 1997 to May 1999</td>
<td>155</td>
<td>8</td>
</tr>
<tr>
<td>Part 232: May 1999 to Dec. 1999</td>
<td>251</td>
<td>5</td>
</tr>
</tbody>
</table>

¹ Part 232 regulations require controls more rigorous than those that EPA required in the 1993 NESHAP.
New York state regulations required co-residential facilities to install vapor barrier by 1999; require all cleaners to use “4th generation” machines by 2001.
Monitored Indoor Air Concentrations: Average Concentration over Time

Current New York DC Landscape

- 1,951 permitted DC’s statewide
- 1,502 registered as perc users
- 449 registered as alternative solvent users
- 46 wet cleaners (not permitted)
- ? Carbon dioxide cleaners
- Around 2% of total DCs are wet or CO₂
- 356 are known residential collocated
- 757 are commercial collocated
Future Issues

• 356 collocated DCs may be moving to alternative solvents in the near future;
• Alternative DC solvents – What are they? Unregulated, safe and a drop-in replacement for perc..........
• Alternative DC solvent review programs.
• Currently revising 6 NYCRR Part 232 to be a Dry Cleaning regulation that covers perc and alternative solvent usage.

Detailed Information

• Overview of 6 NYCRR Part 232: http://www.dec.ny.gov/chemical/38088.html
• New York Dry Cleaner Regulation: http://www.dec.ny.gov/chemical/8567.html
• Approved Alternative Solvents for Dry Cleaning: http://www.dec.ny.gov/chemical/72273.html