

OVERVIEW OF NEW YORK PERC DRY CLEANING REGULATIONS FUTURE DIRECTION

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

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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.

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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.

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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.

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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.
- Perc machines installed in residential settings between 12/21/2005 – 7/13/2006 must be removed by 7/13/2009.
- Reporting requirements pertaining to compliance status for each DC (Form 232-11).

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Monitored Indoor Air Concentrations

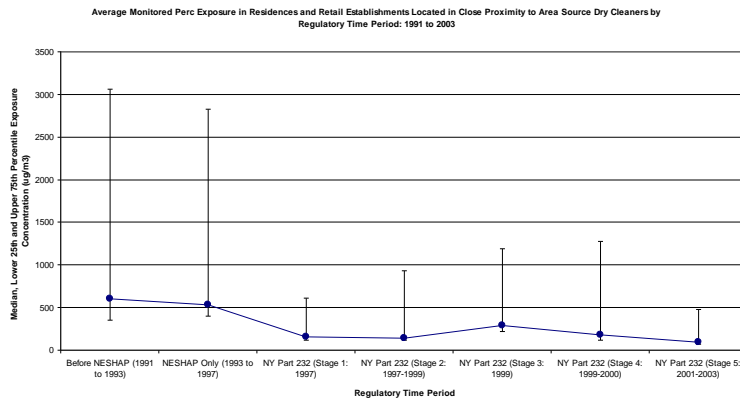
Time Period	Geometric Mean ($\mu\text{g}/\text{m}^3$)	Standard Deviation ($\mu\text{g}/\text{m}^3$)
Pre-NESHAP: before 1993	610	11
NESHAP: 1993 to 1997	507	8
Part 232: May to Nov. 1997 ¹	150	6
Part 232: Nov. 1997 to May 1999	155	8
Part 232: May 1999 to Dec. 1999	251	5
Part 232: Dec. 1999 to Dec. 2000	236	6
Part 232: Jan. 2001 to Aug. 2003	98	7

¹Part 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

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Monitored Indoor Air Concentrations: Average Concentration over Time



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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

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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.

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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>

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Questions ?

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