

June 22, 2008

ABC Dry Cleaner  
123 Riverside Avenue  
Anytown, ME 04123  
Attn: Owner

Dear Perchloroethylene Dry Cleaner:

This letter is to inform you that on June 27, 2006, the U.S. Environmental Protection Agency (EPA) promulgated revised standards under the Clean Air Act for perchloroethylene dry cleaning facilities. In addition, on September 21, 2006 and April 1, 2008, EPA promulgated corrections to the amendments. The National Perchloroethylene Air emission Standards for Dry Cleaning Facilities found at 40 CFR Part 63, Subpart M applies to the owner or operator of a dry cleaning facility that uses perchloroethylene (perc). I have enclosed a fact sheet which summarizes the June 27, 2006 requirements. Please refer to the regulation and the fact sheet to understand your obligations under the rule. A copy of the regulation and amendments may be found at the following internet address: <http://www.epa.gov/ttn/atw/dryperc/dryclpg.html> . The following is a brief overview of the revised requirements:

**Small Dry Cleaner Requirements (not co-located with a residence)**

Existing small dry cleaners, with a solvent consumption less than 2100 gallons per year, which commenced construction before December 21, 2005 must:

- a. By July 27, 2008, **eliminate all transfer machines** requiring the movement of wet clothes from one machine to another for drying.
- b. Beginning on July 27, 2008, **monitor leaks monthly using a halogenated hydrocarbon detector or a perc gas analyzer to detect perc leaks**, in addition to weekly or biweekly perceptible leak checks. Facilities must start repair of any leaks within 2 working days, complete repair within 5 working days and maintain records.

New small drycleaners, with a solvent consumption less than 2100 gallons per year, which commenced construction on or after December 21, 2005 must:

- a. On July 27, 2006 or upon startup, whichever is later, **install carbon adsorbers** (devices that reduce perc vapors exiting the dry cleaning machine as the machine door is opened), in addition to installing a refrigerated condenser on a closed-loop machine.
- b. On July 27, 2006 or upon startup, whichever is later, **monitor leaks monthly using a halogenated hydrocarbon detector or a perc gas analyzer** to detect perc leaks, in addition to weekly or biweekly perceptible leak checks. Facilities

must start repair of any leaks within 2 days, complete repair within 5 working days and maintain records.

### **Dry Cleaners in a Building with a Residence**

As of July 13, 2006, perc dry cleaning machines are not allowed to be installed in a building with a residence.

Existing dry cleaners in a building with a residence which commenced construction before December 21, 2005 must:

- a. By July 27, 2008, **eliminate transfer machines** and meet the same monitoring, leak detection and repair, and recordkeeping requirements as small dry cleaners.
- b. **By December 21, 2020, remove all perc dry cleaning equipment** from the building.

New dry cleaners in a building with a residence which commenced construction on or after December 21, 2005 but before July 13, 2006 must:

- a. Beginning on July 27, 2006, **install equipment to aggressively control perc emissions** (i.e., refrigerated condensers, carbon adsorbers, and vapor barriers).
- b. Beginning on July 27, 2006, meet the same monitoring, leak detection and repair, and recordkeeping requirements as small dry cleaners.
- c. **Completely eliminate perc use by July 27, 2009.**

### **Large Industrial and Commercial Major Source Dry Cleaners**

The final rule requires new and existing major source industrial and commercial perc dry cleaners, with annual solvent consumption greater than 2100 gallons, to use state-of-the-art equipment to detect perc leaks from the machines, repair the leaks and maintain records. Please refer to the regulation for specific requirements for major sources.

### **Reporting Requirements for All Dry Cleaning Facilities**

By **July 28, 2008**, all perc dry cleaning facilities must submit a Notification of Compliance Status Report by registered mail to EPA and/or the delegated state. The report must include:

- (1) The name and address of the owner or operator;
- (2) The address (that is, physical location) of the dry cleaning facility;
- (3) If they are located in a building with a residence(s), even if the residence is vacant at the time of this notification;
- (4) If they are located in a building with no other tenants, leased space, or owner occupants;
- (5) Whether they are a major or area source;
- (6) The yearly PCE solvent consumption based upon the yearly solvent consumption calculated according to Sec. 63.323(d);
- (7) Whether or not they are in compliance with each applicable requirement of Sec. 63.322; and

(8) All information contained in the statement is accurate and true.

A Notification of Compliance status form has been included for your use. You may use this form or create your own containing the information listed above.

The reporting information should be sent to the following address:

Director, Air Compliance Programs  
EPA-New England  
1 Congress Street  
Suite 1100 (SEA)  
Boston, MA 02114-2023  
Attn: Air Compliance Clerk

State of Maine  
Department of Environmental Protection  
Bureau of Air Quality  
State House, Station 17  
Augusta, Maine 04333-0017  
Attn: Lisa P. Higgins

Additional information on this regulation may be found at the following internet address:  
<http://www.maine.gov/dep/air/toxics/drycleaner.htm>. Keep in mind the state regulation, 06 096  
CMR Chapter 125, still applies.

If you have any questions regarding the perchloroethylene dry cleaning regulation, please call  
Susan Lancey of EPA New England at (617) 918-1656 or me at (207) 287-7023.

Sincerely,

Lisa P. Higgins, P.E.  
Environmental Engineer  
Maine DEP

Encl.