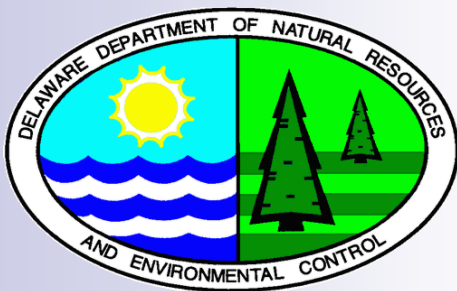


DASP & SOLVENT CLEANING RULE

September 26, 2019



Blue Skies Delaware; Clean Air for Life

- WE ARE JUST STARTING THE REGULATORY DEVELOPMENT PROCESS, THEREFORE THE INFORMATION PRESENTED IS SUBJECT TO CHANGE AS WE GO FORWARD



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SECTION 33.0 OF REGULATION 1124

- 11/11/2001 - EFFECTIVE DATE, COMPLIANCE DATE - 11/1/2002
- COLD & VAPOR CLEANING MACHINES
- MORE THAN ONE LITER & VOC GREATER THAN 5 WT. %
- SOLVENT VAPOR PRESSURE LESS THAN 1.0 mm Hg at 68 F
- SPECIAL DISTILLED MINERAL SPIRITS IS OK & IS 100% VOC



WHY IS CHANGE NEEDED - 1

- GROUND-LEVEL OZONE (SMOG) IS STILL HIGH
- EPA STANDARDS ARE KNOWN AS NAAQS
- EPA REVIEWS AIR QUALITY STANDARDS FOR GROUND-LEVEL OZONE EVERY 5 YEARS & REDUCED THE STANDARD IN 2015
- NON-ATTAINMENT STATUS RATED “SEVERE” IN 1990’S & IS NOW (2015) MARGINAL IN NCC & SUSSEX AND ATTAINMENT FOR KENT



WHY IS CHANGE NEEDED - 2

- GROUND-LEVEL OZONE IS FORMED IN SUNLIGHT BY REACTION OF VOC AND NITROGEN OXIDES (NOX)
- SOME OZONE AND OZONE PRECURSORS (VOC & NOX) ARE TRANSPORTED FROM OTHER STATES & SOME IS MADE HERE
- REDUCING VOC EMISSIONS WILL REDUCE GROUND-LEVEL OZONE



WHAT IS DE DRAFT REVISED RULE BASED UPON

- BASICALLY THE “OTC MODEL RULE FOR SOLVENT DEGREASING 2012” WHICH REVISED COLD CLEANING VOC FROM 100% VOC TO 25 G/L
- (OTC) OZONE TRANSPORT COMMISSION AUTHORIZED BY CAA TO DEVELOP & IMPLEMENT SOLUTIONS FOR THE GROUND-LEVEL OZONE PROBLEM IN NORTHEAST & MID-ATLANTIC REGION
- CT-DE-DC-ME-MD-MA-NH-NJ-NY-PA-RI-VT-NORTHERN VA
- HAS NO RULE MAKING AUTHORITY BUT PREPARES MODEL RULES FOR STATES TO CONSIDER FOR ADOPTION



WHAT WAS OTC RULE BASED UPON

- CALIFORNIA BAY AREA RULE #8-16 OPERATING AT 50 G/L VOC (2002)
- EPA CTG “INDUSTRIAL CLEANING SOLVENTS” EPA 452/R-06-001 (2006)
- CA SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULE 1122 “SOLVENT DEGREASERS” AT 25 G/L (2004)



DOES ANY OTHER OTC STATE USE THE OTC RULE

- NY REVISED 6 CCR NY PART 226 “SOLVENT CLEANING PROCESSES” COLD CLEANING PER EPA CTG FROM 100% VOC TO 50 G/L (2006)
- NY IS CURRENTLY NEARING COMPLETION OF ANOTHER REVISION FROM 50 G/L TO 25 G/L (2019)



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DRAFT REVISED RULE REQUIREMENTS **FOR COLD CLEANING**

- ANY SIZE (WAS MORE THAN ONE LITER)
- CAN BE HEATED TO NON-BOILING (WAS UNHEATED)
- NO MORE THAN 25 G/L VOC SOLVENT SOLUTION (WAS MORE THAN 5 WT. % - 100% ALLOWED WITH VP LESS THAN 1.0 MM Hg AT 68 F)
- ALLOWS HIGHER VOC SOLVENT WITH A CAPTURE & CONTROL DEVICE



WHO USES COLD CLEANING MACHINES

- MFG., MAINT. & REPAIR OF: MOTOR VEHICLES, AIRCRAFT, OFF-ROAD VEHICLES, FARM MACHINERY, BICYCLES, GOLF CARTS, RAIL CARS, MEDICAL EQUIPMENT, COMPUTERS & ELECTRONIC EQUIPMENT, COMMERCIAL & INDUSTRIAL EQUIPMENT, PERSONAL & HOUSEHOLD GOODS, PHARMACEUTICAL & MEDICINE, COATINGS, ADHESIVES, LABORATORIES, AUTO BODY REFINISHING



CLEANING SOLUTIONS AVAILABLE

- SCAQMD “CERTIFIED CLEAN AIR SOLVENTS” LISTS 40 COMPANIES WITH PRODUCTS MEETING THIS CA GROUPS RULES FOR VOC CONTENT WHICH ARE 25 G/L OR LESS *
- A WEBSITE SEARCH COULD BE USED TO FIND OTHER SUPPLIERS OF WATER BASED SOLVENTS AND SOLVENTS AT 25G/L

*The South Coast AQMD’s certification of these products does not constitute or imply an endorsement by the Delaware’s Department of Natural Resources and Environmental Control nor does it certify their ability to meet the requirements for proper disposal of used water-based cleaners.



RULEMAKING ESTIMATED SCHEDULE

- PUBLIC WORKSHOPS - FALL 2019
- PROPOSED RULE IN REGISTER - WINTER 2020
- PUBLIC HEARING - SPRING 2020
- FINAL RULE IN REGISTER - SUMMER 2020
- COMPLIANCE DATE - SUMMER 2021



OPERATIONS THAT MAY NOT BE APPLICABLE UNDER SECTION 33.0

- USING A NON-VOC - SEE SECTION 2.0 OF REGULATION 1101 FOR COMPOUNDS EXEMPT FROM BEING CONSIDERED A VOC – LIKE ACETONE
- USING SPRAY CANS OF GENERAL PURPOSE DEGREASER (10% VOC) UNDER SECTION 2.0 OF REGULATION 1141
- USING WATER-BASED COMPOUNDS WITH ZERO VOC
- BE REMINDED: USING ONE OF THE 3 HAPs (HAZARDOUS AIR POLLUTANTS) THAT ARE NON-VOC* IN REGULATION 1138 MAY TRIGGER SECTION 8.0 OF 1138 – A FED RULE

* METHYLENE CHLORIDE/ PERC/TRICHLOROETHANE



HOW CAN I KEEP UP WITH WHAT IS GOING ON ?

SEE THE WEBSITE AT:

<https://dnrec.alpha.delaware.gov/air/permitting/under-development>

- IT WILL BE UPDATED PERIODICALLY WITH KEY EVENTS
- IN ADDITION YOU WILL RECEIVE US MAIL OR EMAIL INVITATIONS TO THE WORKSHOPS AND HEARING AND WILL BE INVITED TO COMMENT ON THE PROPOSED AND FINAL RULES

ALSO contact me at 302-324-2071 or email at gene.pettingill@delaware.gov or Renae Held at 302-739-9402 or email at renae.held@delaware.gov



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