

Department of Environmental Quality
Air Quality Program

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

PERCHLOROETHYLENE DRY CLEANERS

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from perchloroethylene dry cleaners subject to the National Emission Standards for Hazardous Air Pollutants for Perchloroethylene Dry Cleaners (40 C.F.R. part 63 subpart M).
2. The facilities assigned to this General Permit must not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment and are assigned to other General Permits and categorically insignificant activities defined by OAR Chapter 340 Division 200. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.
3. The facilities assigned to this General Permit must not be subject to the New Source Performance Standards for petroleum dry cleaners (40 C.F.R. part 60 subpart JJJ).
4. The facilities assigned to this General Permit must not be collocated in a building with a residence. The facilities also must not operate a 'transfer' type cleaning system; these systems are subject to additional requirements that are not included in the permit.

ASSESSMENT OF EMISSIONS

5. Facilities assigned to this General Permit are area sources of perchloroethylene emissions (a Hazardous Air Pollutant).
6. DEQ has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit will remain area sources and compliant with applicable emission limits. EPA documentation establishes a major source threshold at 1,800 gallons of perchloroethylene use for most dry cleaning facilities. The permit requires sources to notify DEQ prior to exceeding 1,500 gallons.

EMISSION FACTORS

7. Perchloroethylene Emission Factor

Activity or Process	Emission Factor	Units
Perchloroethylene Purchased	10.125 ¹	lbs/gallon

1. Draft CAPCOA Air Toxics “Hot Spots” Program Perchloroethylene Dry Cleaners Industry-Wide Risk Assessment Guidelines (June 20, 2000). [Assumed 25% solvent recovery rate applied to perchloroethylene’s density of 13.5 pounds per gallon]

10.125 lbs/gallon X 1,777 gallons = 17,992 lbs. 17,992 lbs / 2,000 lbs = 8.99 tons

This permit establishes a limit on perchloroethylene purchases of 1,700 gallons to ensure emissions remain below major emissions levels.

SPECIFIC AIR PROGRAM APPLICABILITY

8. Facilities assigned to this General Permit are subject to the general nuisance requirements (odors) in OAR Chapter 340, Division 208. The permit contains requirements and limitations to ensure compliance with these standards. The visible emissions and fugitive dust standards in OAR Chapter 340, Division 208 are applicable to these facilities but they do not typically cause visible or fugitive emissions so the standards have not been included in the permit. The particulate matter emission limits in OAR Chapter 340, Division 226 are not applicable to these facilities because the emissions, if any, are fugitives, which cannot be measured using standard test methods.
9. Facilities assigned to this General Permit are subject to the applicable standards for dry cleaning facilities and dry stores in OAR Chapter 340, Division 124.
10. This permit incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations in 40 C.F.R. Part 63, Subpart M, for dry cleaners using perchloroethylene. EPA promulgated the NESHAP on September 22, 1993, and several amendments and/or corrections since initial promulgation. The NESHAP, including amendments and corrections through July 1, 2018, are adopted as state rules in OAR 340-244-0220, excluding the exemptions listed in 40 C.F.R. §63.320(d) and (e).

COMPLIANCE ASSURANCE

11. Permittees are required to maintain records of perchloroethylene purchases, leak inspections, repairs, monitoring results, complaints, and Operation and Maintenance manuals for each dry cleaning system and each emission control device. Permittees are also required to submit an annual compliance report to DEQ.
12. DEQ staff perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.

REVOCATION OF ASSIGNMENT

13. Any facility that fails to demonstrate compliance or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a more stringent level of permitting.

PUBLIC NOTICE

14. General Air Contaminant Discharge Permits are authorized by Oregon Administrative Rules and are part of the State Implementation Plan. As part of the General ACDP issuance process under OAR chapter 340, division 209, the public was provided at least 30 days to submit written comments. DEQ reviewed comments and modified the permits in response to the comments.

AQGP-006r, dry cleaners
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