



Air Pollution Control Division

Small Business Assistance Program

NSPS Subpart JJJ - Petroleum Dry Cleaners

General Requirements and Performance Testing Procedures

The New Source Performance Standard for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) was established to limit the emission of VOCs from petroleum dry cleaning operations. This document reviews the general requirements for dry cleaning operations subject to Subpart JJJ and details the performance testing procedures that may be required under this rule.

GENERAL REQUIREMENTS

- ❖ Facilities with dry cleaning machines using hydrocarbon and other petroleum-derived solvents (e.g., DF-2000, EcoSolv, GenX) may be subject to the NSPS (40 CFR Part 60, Subpart JJJ) if the manufacturer's rated capacity from all dry cleaning machines combined at the facility is equal to or greater than 84 pounds.
- ❖ Petroleum machines installed between 12/14/82 and 9/21/84 are exempt from the NSPS if the annual facility petroleum solvent usage is less than 4,700 gallons per year.

Source subject to the NSPS must comply with the following requirements:

1. The dryer must be a solvent recovery dryer.
2. The filter must be a cartridge filter and you must drain the filters in their sealed housings for at least 8 hours prior to removal.
3. The manufacturer of the petroleum solvent dryer should have included leak inspection and leak repair cycle information in the operating manual and on a clearly visible label posted on the dryer.
4. Records of the initial performance test, if required, must be maintained to verify the flow rate of recovered solvent from the dryer. Details on the performance test are outlined below.

PERFORMANCE TESTING

The APCD believes the test method procedures of Subpart JJJ, Section 60.624 were developed for the petroleum transfer machine dryers and may not be applicable to non-vented, closed-loop machines that are equipped with a refrigerated condenser. Therefore, determinations as to whether initial performance testing will be required will be reviewed on a case-by-case basis by the APCD.

❑ Performance test details:

1. The initial performance test may be required to verify that the flow rate of recovered solvent from the dryer at the end of the recovery cycle is no greater than 0.05 liters per minute.
2. This test must be conducted for no less than 2 weeks during which no less than 50% of the dry loads must be monitored for recovered solvent flow rate. If required, a copy of the initial performance test must be maintained.
3. The suggested point for measuring the flow rate is the outlet of the solvent-water separator. Near the end of the recovery cycle, the entire flow of recovered solvent must be diverted to a graduated cylinder.

4. As the recovered solvent collects in the graduated cylinder, the elapsed time is monitored and recorded in periods of greater than or equal to 1 minute.
5. At the same time, the volume of solvent in the graduated cylinder is monitored and recorded to determine the volume of recovered solvent that is collected during each time period.
6. The recovered solvent flow rate is calculated by dividing the volume of solvent collected per period by the length of time elapsed during the period and converting the result into units of liters per minute.
7. The recovery cycle and the monitoring procedure should continue until the flow rate of solvent is less than or equal to 0.05 liters per minute. The type of articles cleaned and the total length of the cycle should be recorded.

PERC AND PETROLEUM - SAME LOCATION

Facilities with multiple dry cleaning machines that use both perc and petroleum solvents must meet the additional regulatory requirements for perc dry cleaners under the National Emissions Standards for Perchloroethylene Dry Cleaners under 40 CFR Part 63, Subpart M. In Colorado at this time, all perc dry cleaners must obtain an air permit from the Air Pollution Control Division. Application materials and guidance is available online for perc dry cleaners at www.colorado.gov/pacific/cdphe/apen-and-permitting-guidance, see Guidance Documents A-G, Dry Cleaning.

SMALL BUSINESS ASSISTANCE

The Small Business Assistance Program (SBAP) is available to answer questions you may have regarding environmental issues at your site. The SBAP can help you understand regulations, determine what your company has to do to be in compliance, help you fill out required forms, calculate your emissions, or provide information by presenting a workshop for your company or for your industry. We are here to help, and our services are always free.

RESOURCES

- ❖ Air Pollution Control Division (APCD): (303) 692-3100
- ❖ Small Business Assistance Program: (303) 692-3175 or 3148
- ❖ Small Business Ombudsman: (303) 692-2135