



# DNREC Virtual Public Hearing

## Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” and Revision to Delaware’s State Implementation Plan (Docket #2020-R-A-0029)

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# **Division of Air Quality**

## **Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)**

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- The amendments are to update control requirements in 7 **DE Admin. Code 1124, Control of Volatile Organic Compound Emissions**, Section 33.0 “Solvent Cleaning and Drying”.

# Division of Air Quality

## Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)

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- Solvent cleaning is the process of using solvents to remove contaminants from various plastic, metal or other substrates (surfaces).
- These amendments will reduce emissions of Volatile Organic Compounds (VOCs) from cold solvent cleaning operations, thus reducing the formation of ground-level ozone.
- Ground-level ozone is formed through the reaction of VOC and other compounds in the air in the presence of sunlight.
- High levels of ground-level ozone can cause or worsen difficulty in breathing, asthma and other serious respiratory problems.

# Division of Air Quality

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### WHAT IS A COLD SOLVENT CLEANING MACHINE

- A container with a non-boiling liquid solvent, containing VOC, into which parts are placed to remove soils from the surfaces of the parts or to dry the parts.
  - The container of solvent can be any size.
- Examples include:
  - Batch,
  - Immersion,
  - Remote reservoir (sink-on-a-drum),
  - Conveyorized in-line cleaning, and
  - Various types of spray booths, flush booths or wash stations.

Remote Reservoir  
(Sink-on-a-drum)



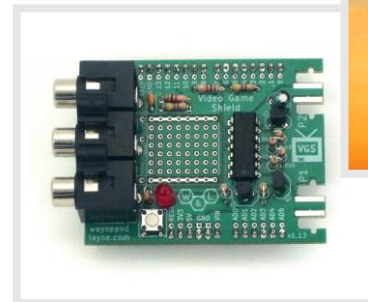
Source: TP Tools & Equipment

# Division of Air Quality

## Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)

### WHO USES A COLD SOLVENT CLEANING MACHINE

- Auto repair, rail car & bicycle shops
- Machine shops
- Airplane repair
- Medical equipment
- Laboratories
- Electronics
- And many more



# **Division of Air Quality**

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### **WHO MAY BE AFFECTED BY THESE AMENDMENTS**

- Anyone in Delaware with a cold solvent cleaning machine using VOCs
  - VOCs - Defined in **DE Admin. Code 1101**
- Anyone selling or importing solvents to be used in a Delaware cold solvent cleaning machine

# **Division of Air Quality**

## **Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)**

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### Amendments are based on:

- 2012 Ozone Transport Commission (OTC) Rule for Solvent Degreasing
  - Develops solutions for the ozone problem in Northeast & Mid-Atlantic region
- California South Coast Air Quality Management District (SCAQMD) Rule 1122 “Solvent Degreasers” (2004)

# **Division of Air Quality**

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### **The proposed amendments include:**

- (1) Eliminating the exemption for cold cleaning machines containing less than one liter of solvent and less than five weight percent VOC,
- (2) Allowing cold cleaning machines to be heated to below boiling,
- (3) Reducing the solvent VOC concentration from 100 percent to 25 g/l of non-VOC solution for most applications,
- (4) Allowing higher VOC concentrations to be used in conjunction with a VOC capture and control device, and
- (5) Non-substantive administrative wording edits and corrections



# Division of Air Quality

## Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)

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### • Errata Table

LOCATION	DESCRIBE ERROR	PROPOSED CORRECTION	CLEAN VERSION
33.4.4.11	<p>At the end of the sentence after “... solvent surface” text is missing, the wording should be similar to subsection 33.6.7.7.</p> <p>33.4.4.11 When solvent is added to or drained from the batch vapor cleaning machine, the solvent shall be transferred using threaded or other leak-proof couplings, and the discharge end of the pipe shall be located beneath the liquid solvent surface.</p>	<p><u>We propose to add the following text.</u></p> <p>33.4.4.11 When solvent is added to or drained from the batch vapor cleaning machine, the solvent shall be transferred using threaded or other leak-proof couplings, and the discharge end of the pipe shall be located beneath the liquid solvent surface <u>of the receiving container whenever possible to reduce splashing.</u></p>	<p>33.4.4.11 When solvent is added to or drained from the batch vapor cleaning machine, the solvent shall be transferred using threaded or other leak-proof couplings, and the discharge end of the pipe shall be located beneath the liquid solvent surface of the receiving container whenever possible to reduce splashing.</p>
33.5.3.13	<p>Typo. In the current regulation the term “on-line” is used instead of “in-line”.</p> <p>33.5.3.13 If a lip exhaust is used on the on-line cleaning machine, the ventilation rate shall not exceed 20 m<sup>3</sup>/min/m<sup>2</sup> (65 ft<sup>3</sup>/min/ft<sup>2</sup>) of on-line cleaning machine open area, unless a higher rate is necessary to meet OSHA requirements.</p>	<p><u>We propose to change the term “on-line” to “in-line”.</u></p> <p>33.5.3.13 If a lip exhaust is used on the <del>on-line</del> <u>in-line</u> cleaning machine, the ventilation rate shall not exceed 20m<sup>3</sup>/min/m<sup>2</sup> (65 ft<sup>3</sup>/min/ft<sup>2</sup>) of <del>on-line</del> <u>in-line</u> cleaning machine open area, unless a higher rate is necessary to meet OSHA requirements.</p>	<p>33.5.3.13 If a lip exhaust is used on the in-line cleaning machine, the ventilation rate shall not exceed 20m<sup>3</sup>/min/m<sup>2</sup> (65 ft<sup>3</sup>/min/ft<sup>2</sup>) of in-line cleaning machine open area, unless a higher rate is necessary to meet OSHA requirements.</p>

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- Proposed amendments expected to reduce VOC emissions by 110 ton per year.
- Existing sources will have a year from the effective date of the final regulation to comply with the proposed amendments.
- New sources will be required to comply with the proposed amendments upon startup.
- Proposed amendments will be submitted to Delaware's State Implementation Plan

# **Division of Air Quality**

## **Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)**

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### List of Exhibits Entered into the Public Record:

- Current Regulation 7 DE Admin. Code 1124, Section 33.0
- Start Action Notice
- Technical Support Document
- 2012 Ozone Transport Commission (OTC) Model Rule
- 2012 OTC Model Rule –Technical Support Document
- Rule 1122 “Solvent Degreasing”, The California South Coast Air Quality Management District
- Rule 1171 “Solvent Cleaning Operations”, The California South Coast Air Quality Management District
- Regulation 8 – “Organic Compounds” and Rule 16 – “Solvent Cleaning Operations”, The California Bay Area Air Quality Management District
- Regulation 8 and Rule 16 – Staff Report, The California Bay Area Air Quality Management District

# **Division of Air Quality**

## **Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)**

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### List of Exhibits Entered into the Public Record:

- Control Techniques Guidelines: Industrial Cleaning Solvents, EPA
- Report - Control Measure Development Support Analysis of Ozone Transport Commission Model Rules
- Brochure - Switching to Water-Based Cleaners in Repair and Maintenance Parts Cleaning
- Report - Alternative Low-VOC, Low Toxicity Cleanup Solvents for the Screen Printing Industry
- Report - Assessment, Development and Demonstration of Low-VOC Cleaning Systems for the South Coast Air Quality Management District Rule 1171
- Report - Tert-Butyl Acetate: Safer Alternatives in Cleaning and Thinning Applications
- Report - Final Environmental Assessment for: Proposed Amended Rule 1122- Solvent Degreasers

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## **Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)**

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List of Exhibits Entered into the Public Record:

- Fact Sheet - Case Studies in Aqueous Parts Cleaning – Best Environmental Practices for Auto Repair Shops
- **7 DE Admin. Code 1101**, Definitions and Administrative Principles
- **7 DE Admin. Code 1102**, Permits
- **7 DE Admin. Code 1124**, Control of Volatile Organic Compound Emissions
- **7 DE Admin. Code 1124**, Control of Volatile Organic Compound Emissions, Appendices
- **7 DE Admin. Code 1138**, Emission Standards for Hazardous Air Pollutants for Source Categories, Section 8.0 “Emission Standards for Halogenated HAP Solvent Cleaning”
- **7 DE Admin. Code 1141**, Limiting Emissions of Volatile Organic Compounds from Consumer and Commercial Products

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## **Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)**

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### List of Exhibits Entered into the Public Record:

- Interested Persons List
- Presentation for Delaware Automotive Service Professionals meeting
- Signup sheet for Delaware Automotive Service Professionals meeting
- Public Workshop invitation letter and mailing list
- State of Delaware Public Meeting Calendar Announcement for the Public Workshops
- Public Workshop presentation
- Signup sheets for Public Workshops
- Draft regulation for 7 **DE Admin. Code** 1124, Section 33.0 presented at Public Workshops

# **Division of Air Quality**

## **Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)**

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### List of Exhibits Entered into the Public Record:

- Public comment letters
- First Legal Notice (10-25-2020) announcing the virtual Public Hearing
- Affidavits for 10-25-2020 legal notice
- Second Legal Notice (11-1-2020) announcing the virtual Public Hearing – Corrected typo in virtual hearing event number
- Affidavits for 11-1-2020 legal notice
- DNREC Public Hearing Notice
- State of Delaware Public Meeting Calendar notice for Public Hearing
- Register Notice for proposed amendments
- Proposed Amendments to 7 **DE Admin. Code** 1124, Section 33.0

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## **Proposed Amendments to 7 DE Admin. Code 1124, Section 33.0 “Solvent Cleaning and Drying” (Docket #2020-R-A-0029)**

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### List of Exhibits Entered into the Public Record:

- Regulatory Flexibility Analysis and Impact Statement
- Corrected Regulatory Flexibility Analysis form, revised due to typo in the form
- Errata table for non-substantive changes to the proposed amendments
- Governor John Carney’s 3/12/20 State of Emergency Declaration
- Governor John Carney’s 3/13/20 Proclamation for Electronic Meetings
- DNREC Press Release on 3/17/20 Announcing Virtual Hearings
- DNREC Website Announcing Updates to Services, Including Virtual Hearings
- DNREC Press Release on 3/20/20 Reiterating use of Virtual Hearings
- Public Workshop Presentation





# DNREC Virtual Public Hearing

## Proposed Revisions to 7 DE Admin. Code 1124, Section 33.0 (Docket #2020-R-A-0029)

Thank you for joining us. We will accept comments on this matter through December 17, 2020.

Comments may be submitted in writing

via [DNREC Comment form](https://dnrec.alpha.delaware.gov/public-hearings/comment-form/) - <https://dnrec.alpha.delaware.gov/public-hearings/comment-form/>

via [email](mailto:DNRECHearingComments@delaware.gov)- [DNRECHearingComments@delaware.gov](mailto:DNRECHearingComments@delaware.gov)

or by USPS mail:

Theresa Newman, Hearing Officer

DNREC – Office of the Secretary

89 Kings Highway, Dover, DE 19901

The full verbatim transcript will be posted when it becomes available.

For more information, find the event page for this hearing on the DNREC Public Hearings page

[dnrec.alpha.delaware.gov/public-hearings/](https://dnrec.alpha.delaware.gov/public-hearings/)