



## Fact Sheet

### Pennsylvania's New Industrial Solvent Cleaning Rule

The Pennsylvania Environmental Quality Board recently promulgated a new regulation on the use of industrial cleaning solvents. The regulation adopts Reasonably Available Control Technology (RACT) emission limitations on VOC emission sources that are not regulated elsewhere in 25 Pa. Code Chapter 129 or 130. This rule took effect upon its publication in the *Pennsylvania Bulletin* on August 11, 2018. Affected facilities are required to be in compliance on that date.

The rule has broad applicability for owners and operators of facilities where industrial cleaning solvents are used as a cleaning activity at a cleaning unit operation, a production-related work area, or a part, product, tool, machinery, equipment, vessel, floor, or wall. However, it provides a number of exemptions. For sources covered by the new rule that are also subject to more stringent requirements in federal New Source Performance Standards (NSPS), the NSPS requirements govern. The new rule supersedes the requirements of a RACT permit issued prior to August 11, 2018, unless the RACT permit is more stringent.

The new rule includes four key definitions – *cleaning activity*, *cleaning unit operation*, *industrial cleaning solvent*, and *regulated VOC*. Examples of cleaning unit operations include cleaning of spray guns, lines, and booths; cleaning of manufactured components as a step in the manufacturing process; parts cleaning; cleaning of production equipment; floor cleaning in production areas; and cleaning of tanks and process vessels, provided that such activities are not already regulated in Chapter 129.

Approximately 40 source categories are exempted from the rule, including cleaning unit operations subject to the National Emission Standards for Hazardous Air Pollutants from Halogenated Solvent Cleaning (40 CFR 63, Subpart T); automobile and light duty truck coatings; flexible packaging printing materials; graphic arts printing and coating; miscellaneous metal parts coating; paper, film, and foil coating; plastic parts coating; wood furniture coating; and pharmaceutical manufacturing. Facilities claiming exemption and facilities whose total actual VOC emissions from regulated cleaning unit operations are less than 2.7 tons per year are exempt from the emission limitations and work practices but are still subject to recordkeeping requirements.

The rule specifies two options for compliance: (i) the use of compliant cleaning solvents, or (ii) the use of capture systems and add-on VOC control devices. The rule also imposes several work practice requirements related to storage and handling of regulated cleaning solvents and cleanup materials.

Compliance is to be demonstrated by recordkeeping of cleaning solvent composition (for facilities electing the compliant material option) or by the use of monitoring systems (for facilities using capture and control technology).

**IES** can assist you in evaluating the applicability of this regulation to your facility and developing a strategy for achieving compliance in a cost-effective manner.

#### **For more information call or email:**

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