

## EPA Proposes Residual Risk Air Emission Standards for Halogenated Solvents

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Under its authority to control residual risk, EPA has proposed to place a cap on emissions from machines that use halogenated solvents for cleaning parts. [71 Fed. Reg. 47670 (August 17, 2006)]. Halogenated solvent cleaning is generally used in conjunction with industrial processes such as plating, painting, castings, inspections, repair, assembly, heat treatment and machining. Polyurethane processors may use halogenated solvents to clean metal parts prior to casting urethane on the parts.

In 1994, EPA promulgated technology-based emission standards for hazardous air pollutants from the halogenated solvent cleaning source category, referred to as the Halogenated Solvent Cleaners MACT Standard. These requirements prompted facilities to make significant changes in how and what halogenated solvents were used for cleaning parts. Under section 112(f) of the Clean Air Act, EPA is required to evaluate the remaining risk to public health and the environment following the implementation of technology-based standards such as the Halogenated Solvent MACT Standard. EPA's recent proposal is intended to provide further reductions of halogenated solvent emissions beyond the controls imposed by the 1994 technology-based MACT standard.

According to EPA, if lifetime cancer risk from exposure to halogenated solvents exceeds one in a million, then more stringent residual risk standards are needed. Based on its risk findings, EPA has proposed two regulatory options to cap the facility-wide emissions of methylene chloride ("MC"), perchloroethylene ("PCE") and trichloroethylene ("TCE") from both new and existing halogenated solvent cleaning machines. Option One would impose a facility cap to reduce emissions of halogenated solvents by approximately 60 percent and Option Two would impose a cap to reduce emissions by approximately 70 percent.

Regardless of the regulatory option, these new residual risk standards could impose significant burdens on facilities that use halogenated solvents for cleaning parts. EPA has requested comments on these two regulatory options and the potential impacts on the halogenated solvents cleaning source category by October 2, 2006.

### PMA Monitored Chemicals

- 1) **TDI** – CAS: 584-84-9 (2,4-TDI), 91-08-7 (2,6-TDI), 26471-62-5 (Isomer mixture)
  - 1a) Toluene diisocyanate
- 2) **MDI** – CAS: 101-68-8
  - 2a) 4,4'-Diphenylmethane Diisocyanate
- 3) **MbOCA** – CAS: 101-14-4
  - 3a) MOCA
  - 3b) 4,4'-Methylenebis(2-chloroaniline)
- 4) **Methylene bis** (4-cyclohexylisocyanate) – CAS: 5124-30-1
  - 4a) HMDI
- 5) **Isophorone diisocyanate** – CAS: 4098-71-9
  - 5a) IPDI
- 6) **Dipropylene glycol dibenzoate** (Benzoflex 9-88)
- 7) **1,4 butanediol (BDO)** – CAS: 110-63-4
- 8) **Trimethylolpropane (TMP)** – CAS: 77-99-6
- 9) **Polyurethane** (product, not a chemical)

### The following solvents will be dropped from the monitoring program:

- **Methylene dianiline (MDA)** – CAS: 101-77-9
- **Methylene chloride**
- **Methylethyl ketone 2-butanone** – CAS: 78-93-3
- **1,1,1-trichloroethane** – CAS: 71-55-6
- **Toluene** – CAS: 08-88-3