

How to Register under the Registration of Smaller Sources (ROSS) Program or Obtain an Air Permit for Petroleum Dry Cleaning

Q — Do I need to register under ROSS or apply for an air pollution control permit for my dry cleaning operation?

A All petroleum solvent dry cleaners are required to register under the Registration of Smaller Sources (ROSS) program or obtain an air permit depending on their solvent usage. Most petroleum solvent dry cleaners in the state will meet the emissions criteria to register under the ROSS program. Only coin operated dry cleaners are exempted from air pollution control permit requirements.

Q — How do I determine if I am a ROSS source or need an air pollution control permit?

A The following are general requirements:

ROSS

- Petroleum dry cleaners that emit actual emissions less than 10,000 lbs (use approximately 1562 gallons/yr of petroleum solvent or less) need to register under the ROSS program.
- An Annual Site Fee of \$235 is required annually.
- Requirements for recordkeeping and reporting (e.g., petroleum usage, leak repair, etc.) should be kept on site for the most recent five years.
- More information concerning the ROSS program can be found at www.ilidceo.net/enviro.

PERMITS

- State construction/operating permit from the Bureau of Air at the Illinois EPA are required if not eligible for ROSS.
- Title V permits are required for cleaners that have the potential to use over 100 tons/yr (31,104 gal/yr) of petroleum solvent.
- Limitations may be imposed on usage of petroleum product.
- Requirements for recordkeeping and reporting (e.g., petroleum usage, leak repair, etc.) should be kept on site for the most recent five years.
- An Annual Emission Report is required to be filed by May 1 of each year (no report is required under ROSS).
- An Annual Site Fee of \$235 must be paid to the Illinois EPA annually.
- The following are general requirements for cleaners that have the potential to use over 100 tons/yr (31,104 gal/yr) of petroleum solvent.
 - Emission limits
 - Requirements for leak inspections
 - Good housekeeping requirements (e.g., keep washer and dryer door closed, keep lids closed on solvent containers, etc.)

Federal New Source Performance Standards

Petroleum dry cleaners whose total manufacturer rated dryer capacity is equal to or greater than 84 lbs and were installed after December 14, 1982, have even stricter federal requirements under 40 CFR 60 Subpart JJJ Petroleum Dry Cleaners: New Source Performance Standards (NSPS). *(This is the total of all dryers at the plant. Dryers installed between December 14, 1982, and September 21, 1984, with a plant consumption of less than 4700 gallons are exempt from the federal requirements.)*

If subject to the federal rules:

- Any new dryer installed after December 14, 1982, must be a solvent recovery dryer and use cartridge filters.
- Additional requirements include testing, more recordkeeping, leak detection and repair.

If you fall within this range, then it is recommended that you contact the Illinois EPA Permit Section for assistance.

Q — **How do I register under ROSS or obtain an air permit?**

A **The following forms are required::**

ROSS

ROSS-200 Form- Registration of Smaller Sources Form

PERMITS

APC-629 Application for a Construction and/or Operating Permit for a Lifetime Source (if your potential to emit emissions of voc are less than major)

APC-628 Construction Permit Application for a FESOP Source (if your potential to emit emissions of voc are major, but your actual emissions can be limited to less than major)

APC-197 Fee Determination for Construction Permit Application

APC-220 Data and Information Process Emission Source

APC-260 Data and Information Air Pollution Control Equipment (only if controls are used, e.g., condensers)

Mail completed forms to:

Illinois EPA

Permit Section #11

P.O. Box 19506

Springfield, IL 62794-9506

Forms are available on the Internet at: **www.ildceo.net/enviro**

Q — **Are there other solvents available for use in dry cleaning operations?**

A There are several solvent options for dry cleaners. Some alternative solvents include: aqueous solutions, CO₂, DF-2000, siloxanes (which are silicone based solvents), and perchloroethylene (perc). Perc and DF-2000 dry cleaning operations are subject to federal and state environmental requirements.

? — **For small business assistance contact:**

Illinois Small Business Environmental Assistance Program

Department of Commerce and Economic Opportunity

500 E. Monroe St.

Springfield, IL 62701

Small Business Environmental Assistance Helpline

800-252-3998

Email: deco.sbeap@illinois.gov