

HSC Vendor

Dear Vendor, Trade Association or Assistance Provider:

If you have clients or members who own or operate a solvent cleaning machine that uses any of the following halogenated solvents: methylene chloride, perchloroethylene, trichloroethylene 1,1,1-, trichloroethane, carbon tetrachloride or chloroform, they are likely subject to a new EPA regulation controlling air emissions from solvent cleaning machines (degreasers). The following industry sectors use large quantities of halogenated solvents for cleaning: furniture and fixtures, fabricated metal products, electric and electronic equipment, transportation equipment, miscellaneous manufacturing, food and kindred products, primary metals, nonelectric machinery, and instruments and clocks. Nonmanufacturing industries such as railroad, bus, aircraft, and truck maintenance facilities, automotive and electric tool repair shops, automobile dealers, and service stations also use halogenated solvent cleaning machines.

The upcoming compliance date for most sources is December 2, 1997. We understand that many of these owners/operators subject to the halogenated solvent cleaning machine standards may be small businesses who may not be aware of the new standards or understand how to comply. Accordingly, EPA is trying to facilitate their compliance with the upcoming requirements. We request that you provide your clients/members with the attached fact sheets. These fact sheets introduce the standards and the Agency's compliance incentives policies.

If these businesses suspect that they will not be able to meet the compliance deadline, and they are small businesses with 100 or fewer employees company-wide, they may be eligible to use EPA's Policy on Compliance Incentives for Small Businesses (The Small Business Policy) and have all penalties to which they would otherwise be subject waived or mitigated. To use the Small Business Policy, owners/operators must first notify EPA or the appropriate state agency that they will not be able to comply in time and demonstrate that they meet the eligibility criteria included in the policy. If they are businesses with more than 100 employees, they may qualify for EPA's Incentives for Self-Policing; Discovery, Disclosure, Correction and Prevention of Violations Policy (Audit Policy), which also provides penalty relief.

Please refer to the attached fact sheets for more information on the new air regulation, The Small Business Policy and The Audit Policy. Rule applicability and compliance checklists for the halogenated solvent cleaning machine standards are provided in EPA's guidance, National Emission Standards for Halogenated Solvent Cleaning: Summary of Requirements for Implementing the NESHAP EPA-456R/96-005. You may call NCEPI at 1-800-490-9198 to receive a copy or access the document through the Internet at <http://www.epa.gov/ttn/atw/degimp.html>. For more information on how to take advantage of the penalty relief provided by the Small Business Policy or identify how to obtain assistance, please contact Karin Leff at (202) 564-7068 or the EPA office in your area.

Sincerely,

Elliott J. Gilberg, Director
Chemical, Commercial Services Division

