

(Adopted March 16, 2001)

RULE 1425 FILM CLEANING AND PRINTING OPERATIONS

(a) Purpose

The purpose of this rule is to reduce perchloroethylene emissions from film cleaning and printing operations.

(b) Applicability

This rule applies to film cleaning and printing equipment that uses perchloroethylene or solvents containing perchloroethylene to process motion picture film.

(c) Definitions

For the purposes of this rule, the following definitions shall apply:

- (1) ADD-ON AIR POLLUTION CONTROL EQUIPMENT means equipment installed for the purposes of capturing and removing perchloroethylene emissions from film cleaning or printing equipment.
- (2) CONTACT WET-GATE FILM PRINTING is a method used to print film such that the original and unexposed films are fed in contact through an enclosed solvent bath that surrounds the films while being printed.
- (3) FILM CLEANING EQUIPMENT is equipment in which motion picture film is cleaned.
- (4) FILM PRINTING EQUIPMENT is equipment used to print motion picture film. Film printing equipment includes, but is not limited to, equipment that uses a liquid- or “wet-“ gate optical- or contact-type apparatus to print film.
- (5) OPTICAL WET-GATE FILM PRINTING is a method used to print film through the use of optical lenses and where the original film being printed is wetted with solvent prior to or at the time of printing.
- (6) PERCHLOROETHYLENE means a substance with the chemical formula C_2Cl_4 , also known by the name tetrachloroethylene, Chemical Abstract Number 127-18-4.

(d) Requirements

- (1) The owner or operator of film cleaning or printing equipment shall reduce perchloroethylene emissions via add-on air pollution control equipment to achieve a minimum overall 85 percent, by weight, emission reduction on the following schedule.
 - (A) Film cleaning and contact wet-gate printing equipment shall comply with the provisions of this paragraph no later than March 19, 2002. The owner or operator shall submit complete permit application(s) for controlling such equipment and any applicable fees no later than July 17, 2001.
 - (B) Other printing equipment, such as optical wet-gate printing equipment, shall comply with the provisions of this paragraph no later than March 18, 2003. The owner or operator shall submit complete permit application(s) for controlling perchloroethylene emissions from such equipment and any applicable fees no later than June 18, 2002.
- (2) Effective March 16, 2001, the owner or operator shall maintain good operating practices for all film cleaning and printing equipment including, but not limited to maintaining the equipment in good operating condition at all times, operating the equipment to manufacturer specifications, using equipment specifically designed for perchloroethylene, and complying with any other requirements specified in an operating permit.

(e) Compliance Alternatives

In lieu of compliance with the requirements of paragraph (d)(1), the owner or operator of the facility may comply with either of the following:

- (1) submit an alternative compliance plan, any necessary permit application(s), and any applicable fees no later than July 17, 2001 for equipment subject to subparagraph (d)(1)(A) or no later than June 18, 2002 for equipment subject to subparagraph (d)(1)(B) to the Executive Officer for approval to achieve real, quantifiable, and verifiable perchloroethylene annual emission reductions by the same date and amount that would have occurred pursuant to paragraph (d)(1); or
- (2) submit complete permit application(s) and any applicable fees no later than:
 - (A) July 17, 2001 for equipment subject to subparagraph (d)(1)(A), including any additional equipment at the facility that would be

subject to subparagraph (d)(1)(B), to obtain a facility-wide emissions cap pursuant to Table 1 no later than March 19, 2002 and maintain a facility-wide perchloroethylene emissions level equal to or less than that specified in Table 1 for the nearest specified receptor type and distance; or

(B) June 18, 2002 for facilities with equipment solely subject to subparagraph (d)(1)(B) to obtain a facility-wide emissions cap pursuant to Table 1 no later than March 18, 2003 and maintain a facility-wide perchloroethylene emissions level equal to or less than that specified in Table 1 for the nearest specified receptor type and distance.

(3) The owner or operator complying with paragraph (e)(2) shall achieve an overall 85 percent perchloroethylene emission reduction for their film cleaning equipment via add-on air pollution control equipment.

(f) Recordkeeping and Reporting Requirements

Effective March 16, 2001:

(1) The owner or operator of equipment subject to the provisions of this rule shall maintain records in the same manner as required by District Rule 109 paragraph (c)(1), subdivision (d), and subdivision (e) for all solvents containing perchloroethylene used in film cleaning and printing, except that such records shall be kept at the facility for a minimum of five (5) years. In addition, perchloroethylene density shall also be recorded.

(2) Within fourteen (14) days after the end of each month, the owner or operator shall total the perchloroethylene usage from all film cleaning and printing and determine the amount of perchloroethylene emitted to the atmosphere the preceding month. The records shall include any procedures used to account for control equipment efficiencies and/or waste disposal. Such records shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with this rule and maintained at the facility for a minimum of five (5) years.

(3) The owner or operator shall maintain a list of suppliers, including purchase and delivery receipts, that the facility acquired perchloroethylene from during the preceding five (5) years.

- (4) Reports and results of tests or monitoring conducted to demonstrate compliance pursuant to subdivision (g) shall be maintained at the facility for a minimum of five (5) years.
 - (5) The owner or operator electing to use a compliance alternative specified in subdivision (e) shall submit an annual compliance report to the District demonstrating compliance with subdivision (e) no later than September 1 of each year based on a reporting period from July 1 through June 30.
- (g) Test Methods
- (1) Determination of Capture Efficiency
Capture efficiency of the add-on air pollution control equipment shall be determined using a minimum of three independent sampling runs subject to data quality criteria specified in the most current version of the USEPA technical guideline document, "Guidelines for Determining Capture Efficiency." Individual capture efficiency test runs subject to the USEPA technical guidelines shall be determined by using one of the following methods:
 - (A) the Permanent Total Enclosure and 100% capture efficiency approach of United States Environmental Protection Agency (USEPA) Method 204, "Criteria for and Verification of a Permanent or Temporary Total Enclosure"; or
 - (B) the Temporary Total Enclosure approach of USEPA Methods 204 through 204F using CARB Method 422 as the reference test method for determining fugitive perchloroethylene concentration; or
 - (C) the capture efficiency procedures of District "Protocol for Determination of Volatile Organic Compounds (VOC) Capture Efficiency" using CARB Method 422 as the reference test method for determining gaseous perchloroethylene concentration to the control equipment; or
 - (D) any other method approved by USEPA, CARB, and the District Executive Officer.

(2) Determination of Control Equipment Efficiency

The efficiency of the control equipment of the add-on air pollution control equipment on a mass emissions basis and perchloroethylene content in the control equipment exhaust stream shall be determined by CARB Method 422.

(3) Laboratory Approval

The sampling, analysis, and reporting shall be conducted by a laboratory that has been approved under the District Laboratory Approval Program (LAP) for the cited District reference test methods, where LAP approval is available. For District reference test methods for which no LAP program is available, the LAP approval requirement shall become effective one year after the date that the LAP program becomes available.

(h) Rule 1402 Inventory Requirements

The owner or operator of film cleaning or printing equipment at a facility that is in compliance with this rule will not be required to submit an emission inventory to the Executive Officer, pursuant to subparagraph (n)(1)(B) of Rule 1402 - Control of Toxic Air Contaminants from Existing Sources.

(i) Evaluation

By January 1, 2006, the Executive Officer will conduct a technical assessment to evaluate risk reduction strategies for any facilities subject to this rule exceeding the action risk levels of District Rule 1402.

(j) Federal National Emission Standards for Hazardous Air Pollutants (NESHAP)

Notwithstanding the provisions of this rule, film cleaning equipment using halogenated solvents shall also comply with applicable provisions of the federal NESHAP for halogenated solvent cleaners pursuant to 40 CFR Part 63, Subpart T, including, but not limited to, requirements for emission limitations, recordkeeping, monitoring, and test methods.

**Table 1
Facility-Wide Emission Levels**

Receptor	Distance From Receptor		
	≤ 25 meters	> 25 to ≤ 50 meters	> 50 meters
Residential	35 pounds/month not to exceed 140 pounds/year	92 pounds/month not to exceed 367 pounds/year	274 pounds/month not to exceed 1,095 pounds/year
Off-Site Worker	53 pounds/month not to exceed 212 pounds/year	139 pounds/month not to exceed 556 pounds/year	415 pounds/month not to exceed 1,659 pounds/year