

FACT SHEET

Part 226 Updates - Pollution Prevention Tips



Department of
Environmental
Conservation

New Rulemaking on Solvent Cleaning Processes and Industrial Cleaning Solvents NYSDEC's Division of Air Resources (DAR) and Pollution Prevention (P2) Unit are offering guidance on alternatives to reduce environmental impacts and meet regulatory requirements.

Regulatory Changes

Summary The prior Part 226 rules only applied to the cleaning of "metal". The new rule is not solely applicable to cleaning of metal and will be split into two subparts, 226-1 "Solvent Cleaning Processes" and 226-2 "Industrial Cleaning Solvents." Owners or operators will need to comply with the new VOC content requirement under 226-1. In addition, 226-2 will require owners or operators of facilities that emit three tons or more of VOCs to comply with certain standards. DAR's [website](#) provides more information on the changes.

Timeline Facilities that are subject to the Part 226 rules must comply with Part 226-1 requirements as of November 1, 2019. After December 1, 2020, Part 226-1 requirements will also apply to cleaning of non-metal objects. New facilities will need to be in compliance upon start-up. Facilities which become subject to the new Part 226-2 rule will need to comply with the proposed requirements within one year of becoming subject to the regulation.

Pollution Prevention Resources

Facilities subject to the regulatory changes described above should consider evaluating alternative processes that don't require cleaning solvents, or find substitutes that are non-toxic, lower in VOC content or VOC-free. While evaluating alternative processes and materials, facilities should keep in mind the following:

- Substitute cleaners need to **(1)** meet the VOC requirements of Part 226-1 or Part 226-2; **(2)** satisfy the facility's cleaning needs; and **(3)** be an environmentally-preferable alternative (i.e., less toxic, lower VOC content than the solvent it is replacing); and
- Alternative processes need to be implemented such that they are avoiding the use of solvents, and are not causing the facility to become subject to any additional regulatory requirements.

The resources below are provided to assist facilities in evaluating alternatives to their current cleaning solvents in order to find equally-effective, less toxic alternatives that may meet the proposed requirements. Each resource below is followed by a description of how it can be used to assist in the decision-making process:

➤ [EPA's Guide to Cleaner Technologies – Organic Coating Removal](#)

This guide was developed by EPA for facilities looking to switch from chemical-based paint and coating removal operations to mechanical or thermal operations. The guide offers descriptions of the various replacement technologies and mechanisms, as well as their benefits and limitations.

➤ [NEWMOA P2 Technology Profile - Enclosed Spray Gun Washers Using Alternative Cleaners](#)

Information about enclosed spray gun washers that use alternative cleaners which reduce hazardous chemical use and the generation of hazardous waste and air emissions. This study focuses on the potential benefits of enclosed spray gun washers using alternative cleaners when compared to traditional spray gun cleaning systems.

KEY POINTS

Solvent Reduction

Companies can avoid or reduce the use of toxic solvents in the following ways:

- *Product Redesign* – modify your product or service so that its manufacture is less reliant on solvents
- *Chemical Substitution* – find solvents that are non-toxic, non-VOC alternatives
- *Process Modification* – use alternative removal methods that don't require solvent, or use less solvent
- *Closed-Loop Recycling* – reclaim spent solvents and reuse them within the process

➤ [Massachusetts Toxics Use Reduction Institute's \(TURI's\) Cleaner Solutions Database](#)

A database that facilities can use to evaluate less-toxic alternatives to many commonly used solvents. The database can be used to find replacements based on the type of substrate, the contaminant being removed, the application method and other criteria. When determining whether a replacement will meet the updated requirements, it is important to review the Safety Data Sheet (available via the database) to determine the VOC content, where applicable.

➤ [EPA's Safer Chemical Ingredients List](#)

A list of chemicals that are categorized by their functional use, and which provides color-coded icons that can help facilities find safer alternatives to toxic solvents used in cleaning processes. Again, facilities should consult Safety Data Sheets to determine whether they meet VOC-content requirements.

➤ [New York State Pollution Prevention Institute's \(NYSP2I's\) Vacuum Cycle Nucleation Case Study](#)

A case study detailing an innovative technology that may serve as a replacement for many cleaning processes that rely on toxic solvents. For more information, interested facility operators can contact NYSP2I (see link under "Contact Information").

See the "Key Points" section on the previous page for additional concepts that may be useful in reducing or eliminating solvent usage at your facility. **Additionally, please note** that the resources provided above are meant to serve as helpful tools in finding alternative cleaning solvents or processes. However, not all of the alternatives contained in these resources are guaranteed to achieve compliance with the new regulation, so facility operators are responsible for carefully evaluating the available information with respect to the regulatory requirements.

Contact Information

For more information on the requirements of the Part 226, please contact DAR's Bureau of Stationary Sources at:

(518) 402-8403 or via email at dar.web@dec.ny.gov

Small businesses looking for assistance in complying with the requirements can contact the Small Business Environmental Assistance Program (SBEAP) at:

(800) 780-7227 (within NYS) or (518) 402-7396, or via email at Harry.Ching@efc.ny.gov

More information on SBEAP's program is available at: <https://www.efc.ny.gov/SBEAP>

New York State Pollution Prevention Institute (NYSP2I)

NYSP2I offers direct assistance to New York State businesses that need help finding economical pollution prevention measures that work for their facility. NYSP2I is based at the Rochester Institute of Technology and has a team of experts that can work with facilities to reduce their use of toxic solvents and save money. To find out more, please visit their website at the link provide below. Please consider contacting them for confidential pollution prevention assistance.

<http://www.rit.edu/affiliate/nysp2i/>

CONTACT INFORMATION

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