

New York State Department of Environmental Conservation

Division of Air Resources

Bureau of Stationary Sources, Room 108

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February 15, 2000

Mr. E.T. Simoneau
Application Development Scientist
GE SILICONES
General Electric Company
260 Hudson River Road
Waterford, New York 12188

Dear Mr. Simoneau:

The New York State Department of Environmental Conservation has reviewed the information submitted pertaining to the use of General Electric's silicone-based dry cleaning solvent, namely decamethylcyclotrisiloxane (SB32), as an alternative to perchloroethylene. As a result, it is the Department's current position that dry cleaning facilities electing to use SB32 will be allowed to register provided that the SB32 solvent is used in dry-to-dry, closed loop (non-vented) machinery. If dry cleaning equipment other than such is used, or if the facility has emissions greater than or equal to State or federal pollutant thresholds, the facility would be subject to the more involved 6 NYCRR Part 201 permitting process.

It is further required that proper wastewater disposal procedures be used with SB32 to minimize any public exposure to the solvent in drinking water or possible contamination of rivers, lakes, and streams. The Department is interested in obtaining the results of the wastewater stream testing for SB32 concentrations that you indicated would be done. As wastewater treatment procedures for SB32 may be different than those used for traditional dry cleaning solvents, the Department is also interested in reviewing any guidelines or recommendations that may exist for the handling of SB32 contaminated wastewater. Please forward such information to this office when it becomes available.

A copy of the Air Facility Registration form is enclosed for your information. Please be advised that the Department reserves its right to require additional information similar to that gathered on the forms used to register perchloroethylene dry cleaning facilities. Additionally, if, in the future, chronic toxicity studies and data suggest significant chronic toxicity or carcinogenicity, SB32 will be re-evaluated and more stringent regulatory procedures may result.



If you have any questions regarding this matter, please contact Michael Cronin or me at the telephone number presented above.

Sincerely,



Patrick J. Lavin, P.E.
Chief, Permitting & Compliance Section
Division of Air Resources

Enclosure

cc: Ron Benjamin (GreenEarth Solutions, LLC)
Jim Caterbone (GreenEarth Cleaning LLC)
John Higgins
Tom Gentile
Marilyn Wurth
Part 232 Implementation Group

GE-SB32apprv.reg