



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
Air and Radiation Division
5 Post Office Square, Suite 100
Boston, MA 02109

March 8, 2022

Karen Slattery, Deputy Administrator
Office of Air Resources
Rhode Island Department of Environmental Management
235 Promenade Street, Room 230
Providence, RI 02908

Dear Ms. Slattery:

The U.S. Environmental Protection Agency (EPA) has reviewed the proposed amendments to Rhode Island's Air Pollution Control (APC) Part 36, "Control of Emissions from Organic Solvent Cleaning." We support the draft changes to APC Part 36 to add federal definitions found in EPA's Halogenated Solvent Cleaner National Emission Standards for Hazardous Air Pollutants. We have the following comments related to the definitions.

1. Rhode Island should also add the NESHAP definition for "solvent/air interface area" because this term is used in APC Part 36 (see 36.5.(A)(33), 36.15.1(A)(3), and 36.15.1(B)(3)).
2. In section 36.5(A)(38), we believe you intended to include a definition for "Soils" and if so, would need to add the missing "s."

We appreciate your efforts to apply stringent controls to organic solvent cleaning operations in Rhode Island and your work to implement the Halogenated Solvent Cleaner National Emission Standard for Hazardous Air Pollutants (NESHAP) requirements through a state rule substitution. If you have any questions regarding our comments in the Enclosure, please contact Susan Lancey of my staff at (617) 918-1656.

Sincerely,

Patrick Bird, Manager
Air Permits, Toxics, and Indoor Programs Branch