September 26, 2011

Mr. Alex Ryan-Bond, Environmental Associate

Ozone Transport Commission

Dear Alex,

PSEG Services Corporation, on behalf of its affiliates Public Service Electric & Gas Company (“PSE&G”), and PSEG Power LLC (collectively “PSEG”), hereby submits the following comments on the OTC Model Rule for Solvent Degreasing 2011.

COMMENT 1: OTC Draft Model Rule for Solvent Degreasing 2011

PSEG proposes that the rule be modified to exclude "cold cleaning parts washing machines" that have a top opening of less than six square feet - consistent with the New Jersey Department of Environmental Protection Rules at N.J.A.C. 7:27-8.2(c).  Pursuant to N.J.A.C. 7:27-8.2(c), equipment with a top opening of less than six square feet (0.56 square meters) or a capacity **less** than 100 gallons is not considered to be a significant source and does not require a preconstruction permit and an operating certificate.

In addition to requiring consistency between regulations, it should also be noted that smaller “cold cleaning parts washing stations”, having a top opening less than six square feet (6 SF) have a lesser environmental impact because of their size compared to larger “cold or heated cleaning parts washing machines”, that expose cleaning solvent to a larger surface area opening and therefore expose a larger quantity of VOC solvent to evaporation into the atmosphere.  In addition smaller parts washing stations are typically used by businesses that wash parts on a less frequent basis and therefore have a lesser environmental impact than larger parts washing stations.

COMMENT 2:  OTC Draft Model Rule for Solvent Degreasing 2011

PSEG beneficially reuses the solvents utilized in our "cold cleaning parts washing machines" to minimize the environmental impact of these solvents.  At PSEG, the beneficial reuse of our solvents in cold cleaning has effectively removed a waste stream.  Changing solvents would in this case add another waste stream from our “cold cleaning parts washing machines”.   PSEG proposes that cold cleaners be exempted in situations where solvents are beneficially reused instead of direct disposal.

In addition, agencies seeking this exemption should provide proof that beneficial reuse is occurring.

PSEG appreciates the opportunity to comment on this proposal.  If you should have any questions, please contact me at 973-430-8086 or by email at [Amy.Martin@pseg.com](mailto:Amy.Martin@pseg.com).