

# **Kenney Slatten Training Co.**

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RE: Comments/suggestions on amendments for control measure for perc  
i.e.: Hearing on January 25, 2007

Page 1-4 E: item 2. *Hot Spots Program*, I don't believe there is any useful reason from a regulatory point of view to continue this program with the alternative solvents.

Page II-2 B, Changes to existing D/C ATCM, Does this apply to dry store? I don't believe it does since there is no cleaning machine and you may want to be specific about that language. Also there should be specific language on spare gaskets. There are 5 frequently used openings on a drycleaning machine and those should be mentioned.

Page II-4, 5. second sentence about a relocated facility should be defined in the Glossary.

Page II-5 6. c. *Leak Check Requirements*, second paragraph about perc detectors- I believe the Aeroqual digital perc sensor should be a requirement to replace the halogenated hydrocarbon leak detector. I is better and gives a digital ppm

Page II-6 8. *Reporting requirements*, This (Annual Report) is not being done by most drycleaners. I have yet to inspect/work with one that does it and the local air districts are not enforcing it. This is the most accurate method of checking machine efficiency I know of.

Page III-8 first paragraph. This should meet the federal OSHA standard of replacing the air once every 3-5 minutes. Few drycleaners have good air flow which is an OSHA concern but for the air district, a concern because this air is going outside if not inside.

Page III-10 f. *Full Vapor Barrier Rooms*, I believe this should be mandatory for all remaining perc operations until the phase out. It is an inexpensive and logical way to contain perc vapors.

Page III-12 last paragraph, I am using the digital Aeroqual leak detector in all my ATCM classes and urging drycleaners to purchase them. The halogenated hydrocarbon leak detectors are inaccurate and this places the drycleaner and inspector on the same level for accurate and fair leak detection. They are only \$300 and worth every penny. It is NOT an economic burden for drycleaners.

Additional suggestions: 1. Prohibit anyone other than air districts from conducting ATCM classes. There are too many instructors and they are in it for the money. Many don't advertise their classes, or have them in legitimate class surroundings and the classes have been disregarded and minimized by too many in the industry. They serve a useful purpose but should be legitimized again. I feel very strongly about this.

2. Prohibit the sales of used perc. It is degradating to the machinery.

3. I would like to see the phase out remain at the 12 year instead of 15 year being considered. Drycleaning machines are not in good shape after 12 year.

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