

Advisory Notice

California Environmental Protection Agency

 **Air Resources Board**

MARCH 2007

Amendments to the Environmental Training Program Curriculum for Perchloroethylene Dry Cleaning Operations

This advisory provides information on changes to the Environmental Training Program Curriculum for Perchloroethylene Dry Cleaning Operations.

At a public hearing on January 25, 2007, the Air Resources Board (ARB) approved amendments to the Airborne Toxic Control Measure for Perchloroethylene (Perc) Dry Cleaning Operations (Dry Cleaning ATCM). In addition to requirements that will restrict and eventually phase out the use of Perc dry cleaning machines, the amendments also establish several new good operating practices requirements. A summary of all the amendments can be found on the ARB fact sheet entitled, *Amended Dry Cleaning ATCM Requirements*. Please note that the amendments approved by the ARB are still pending final approval by the Office of Administrative Law (OAL). We anticipate that the amendments will receive final approval no later than December 31, 2007.

How do these amendments affect the Environmental Training Program?

The approved amendments to the Dry Cleaning ATCM will put in place revisions to the Curriculum for the Environmental Training Program for Perc Dry Cleaning Operations (Training Curriculum). ARB staff will update the existing Training Curriculum to reflect the requirements of the amended Dry Cleaning ATCM.

What are the changes to the Training Curriculum?

The Training Curriculum will be revised to contain the most current information on the dry cleaning industry, Perc, the alternative solvents, and the approved amendments. More specifically, the approved amendments will require changes to the Good Operating Practices section in the Training Curriculum. These will include changes in recordkeeping and reporting; operation and maintenance; and leak check and repairs. Below is a brief summary of these changes.

Trained Operator Requirements:

- The requirement that a trained operator needs to be a full-time employee and that one person cannot serve as a trained operator for two or more facilities simultaneously has been deleted.
- A requirement has been added that a trained operator shall be on site while the Perc dry cleaning equipment is in operation.
- The timeframe to notify the district of the departure of the trained operator has been shortened from 30 days to 15 days.
- The exception that a trained operator who owns or manages multiple facilities may serve as the interim trained operator at two of those facilities simultaneously for a maximum period of 4 months, by which time each facility must have its own trained operator has been deleted.

Recordkeeping Requirements:

- The time requirement to keep records has been changed from 2 years to 5 years.

Reporting Requirements:

Annual report:

- The annual report furnished to the local air district should now cover the period of January 1 through December 31 of each year.

- Facilities are no longer required to keep mileage records, but will still be required to report to the local air district a total of pounds of materials cleaned and gallons of solvent purchased per year.
- Facilities now are required to report to the local air district the make, model, serial number and date of manufacture of the dry cleaning machine.

Operation and Maintenance:

- All requirements have been deleted for transfer machines. These machines should not be in use for Perc dry cleaning operations.
- A requirement is now added for facilities to keep a spare set of gaskets and spare lint filter on site.
- A requirement is added for carbon adsorbers in secondary control machines to be stripped or drained in accordance with manufacturer’s instructions or at least weekly, whichever is more frequent.

Leak Checks and Repair:

- A requirement has been added to have the Perc dry cleaning system inspected once per calendar year for liquid and vapor leaks using a portable detector which gives quantitative results with less than 10 percent uncertainty at 50 ppmv of Perc.
- Timeframes for repairs have been shortened as follows:

Requirement	Existing ATCM	Approved ATCM
Any liquid/vapor leak shall be repaired . . .	within 24 hours	immediately
If repair parts are not available, parts shall be ordered within . . .	two working days	next business day
Repair parts shall be installed within . .	five working days	two business days
A facility with a leak that has not been repaired by the end of the . . .	15 th working day after detection shall not operate the dry cleaning equipment, until the leak is repaired, without a leak-repair extension from the district.	7 th working day after detection shall not operate the dry cleaning equipment, until the leak is repaired, without a leak-repair extension from the district.

How does this affect a certified instructor of the Environmental Training Program?

Upon OAL approval of the ATCM, all certified instructors are to begin using the new curriculum or incorporate the approved amendments into their approved curriculum.

How does this affect a trained operator?

Perc dry cleaning facilities continue to be required to have a trained operator on site while the Perc dry cleaning machine is in operation. The trained operator is required to receive initial certification and receive recertification every three years. The revisions listed above will be implemented into the curriculum of the environmental training program and all trained operators shall implement these revisions at Perc facilities upon final approval of the ATCM by OAL.

What about facilities in the South Coast Air Quality Management District (AQMD)?

The requirements for Perc dry cleaners may not apply to those located in the South Coast AQMD. The ARB staff is evaluating South Coast AQMD’s Rule 1421 to determine if their current rule is equally effective in reducing Perc exposure than the State’s amended Dry Cleaning ATCM. Please contact ARB or AQMD staff regarding equivalency questions.

Who can I contact for more information?

For more information, contact Tom Raschke at 916-445-0961 (e-mail: traschke@arb.ca.gov), Sonia Villalobos at 916.327.5983 (e-mail: svillalo@arb.ca.gov), Mei Fong at 916.324.2570 (e-mail: mfong@arb.ca.gov), Hafizur Chowdhury at 916.322.2275 (e-mail: hchowdhu@arb.ca.gov), or visit our website at <http://www.arb.ca.gov/dryclean>.