

Dear Illinois Pollution Control Board Member,

First, I would like to express gratitude to the Illinois Pollution Control Board, especially how that Board handles the rulemaking process. This reflects how the Board cares about the rulemaking for the dry cleaning industry and I was delightfully surprised. I have been in the industry over three decades and attended so many Fund Council meetings, but this rulemaking procedure is the most organized and precise. I am not discrediting the Fund Council's hard work, but I couldn't say their policies, procedures weren't executed with the proper procedures. Attending the last two public hearings, I am now confident that the dry cleaning industry is in good hands.

Since this might be my last opportunity to express my comments on rulemaking for R 21-19, I will propose continuing education (CE) and/or the third party inspections. In regards to CE and/or third party inspections, I would like to reiterate the important and various benefits of tailored CE for dry cleaners, EPA and the general public for environmental protection. First and the most essential benefit would be that dry cleaners themselves become aware of the serious environment impacts of preventing any further contamination. Second, CE provides dry cleaners up to date with any regulation changes and reminds dry cleaners to stay in compliance and keep their facilities above regulations. Third, CE gives dry cleaners the ability to communicate with customers related to preventing pollution and environmental impacts. Besides these benefits, CE helps dry cleaners share information with each other and how to do certain paperwork etc.

Since 2004, NDI has hosted over 150 CE in which I was one of the speakers, so I have witnessed the benefits of CE firsthand. Due to the CE, there have been little to no chemical spills since the Fund was created. CE has helped dry cleaners, the fund and EPA to communicate with each other more efficiently. Furthermore, compared to dry cleaners in other states, Illinois dry cleaners are the most knowledgeable on how to prevent pollution and to follow regulations. Most of the industry feels that CE was informational and is needed.

Honestly, there has been a lot of confusion and complaints about CE and third party inspections. The complaints were not because of its lack of benefits, but how it was conducted by the Council of the Fund in the past. The Council set up CE and the third party "policies" unnecessarily complicated and changed them so often. The Council members themselves were confused on what changes had been made and when. The frequent policy changes caused confusion to dry cleaners, but to dry cleaners it was mandatory to complete CE/ third party inspection to keep the Fund insurance and remedial clean-up benefits. However, the Council never adopted rules regarding CE and the third-party inspections even though I suggested rulemaking through JCAR to the Council as a Council member and as a dry cleaner. When all efforts failed, I suggested a simpler and easier version of "policies" to the Council, but it was not accepted.

I strongly believe that CE and/or third party inspections are beneficial to dry cleaners, EPA and the general public. If it is implemented, I would suggest clear and consistent rules.

Thank you for your time and consideration.

Sung Kang

NDI Chairman

Drycleaners Environmental Response Trust Fund of Illinois former Council Member

Federal Korean American Dry Cleaners Association former Chairman

Federal Korean American Dry Cleaners Association of Chicago former Chairman

Illinois Drycleaners Association former President

Dry cleaners owner since 1983

For informational purposes, below are some of the topics that I spoke about as part of CE courses.

Hazardous waste

- How to store waste: locations, type of container...
- Proper way to haul waste: licensed company
- How to check the secondary containment pan: size, material, storage...

Solvent delivery

- direct coupling system

Dry cleaning machine

- Maintenance: winterizing...
- Record keeping
- Solvent leaking
- Temperature control
- Secondary container 110%