

From: [Sue Kratz](#)
To: [Brown, Don](#); [Metz, Cassandra](#)
Subject: [External] Re: Drycleaner Environmental Response Trust Fund Act Proposal to Add 35 Ill. Adm. Code Part 1501, Repeal 35 Ill. Adm. Code Part 1500, and Repeal 2 Ill. Adm. Code Part 3100, R21-19(A)
Date: Monday, June 3, 2024 12:53:07 PM
Attachments: [image001.png](#)

Dear Mr. Brown and Ms. Metz,

The Officers and Board Members of Illinois Professional Drycleaners and Launderers appreciate the agency's ongoing communication with our organization. We recently received your email regarding the Compliance portion of the IDERTF legislation which recommends adding CEU's to the Compliance Program.

We believe that the proposed changes are very narrowly focused and affect only a small number of drycleaners in the State, as there are very few that have been in business less than ten years and even fewer of those that are in the Insurance Fund portion of the program. As drycleaners, we have been down this road before with the Trust Fund when it was managed by Williams and Co. There was a time when all licensed drycleaners were required to complete CEUs. It then became only the drycleaners that were in the Insurance Fund. Because there were some unscrupulous programs/individuals that offered the CEU classes, the administrator felt the need to monitor the programs by approving in advance the Speakers, Topics, and Content and they would determine the number of CEUs that the class would receive. Is someone from IEPA going to do the same? Some of the aforementioned persons/programs are still operating and would seize the opportunity to turn this into a money maker for themselves if there is no oversight.

Also, the number of CEUs that is being proposed seems to be unrealistic. The handful of drycleaners that would be forced to obtain the CEUs would be subject to hearing the same speakers/information repeatedly, and as stated above, the only ones benefiting from the "education" would be those providing the classes. It also would become more and more difficult to find quality, qualified speakers as the number of participants is so low. We also feel that all of the drycleaners that are in the insurance fund would still benefit from having a Compliance Program Inspection every two years as this is an opportunity for education and to ensure that the participant continues to be in compliance with State, Federal, and OSHA regulations. In the past, these inspections were approved for two CEUs.

We will, if necessary, provide educational programs for our members and nonmembers, however we would want to know what type of oversight and regulation would be involved on IEPA's end of things, and what type of reporting would be required from us.

Thank you for requesting feedback from the stakeholders in this program.

Sincerely,

IPDL Board Members

Sue Kratz
Executive Director
IPDL
800-462-4732

On Thu, May 16, 2024 at 2:38 PM Brown, Don <Don.Brown@illinois.gov> wrote:

By this e-mail, the Illinois Pollution Control Board serves you with the attached Board Order of May 16, 2024.



Don A. Brown

Clerk of the Board

Illinois Pollution Control Board

312-814-3461

FAX: 312-814-3669

Don.Brown@illinois.gov

The new address for the IPCB is:

60 E. Van Buren St., Ste. 630

Chicago, Illinois 60605

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