

From: [sung.kang](#)
To: [Brown, Don](#)
Subject: [External] DRYCLEANER 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
Date: Friday, June 14, 2024 3:08:47 PM

Hi Mr. Brown,

Here are my comments regarding the two new sections for DRYCLEANER 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

Compliance programs and continuing education started in the Drycleaners Environmental Response Trust Fund of Illinois in 2000, which lasted until June 30, 2020. This was a policy, not a law, but the dry cleaners owners/operators complied even through the many changes.

Since 2020, dry cleaners have not been taking continuing education and requiring dry cleaners owners/operators to start getting continuing education again seems burdensome.

Section 1501.165 Continuing Education

a) Continuing Education Requirements

1) To renew a license, an owner or operator must complete 5 hours of continuing education every calendar year.

I feel that five continuing education credits in one year are excessive.

c) Waiver of Continuing Education Requirements

Owners and operators who have, for at least 10 consecutive years on or after January 1, 2009, owned or operated a dry cleaning facility licensed under the Drycleaners Environmental Response Trust Fund Act are exempt from the requirement to comply with the continuing education requirements under this Section.

For example:

Thomas owns Thomas' Cleaners for 15 years but then purchased XYZ Cleaners after January 1, 2009. Since Thomas is the new owner of XYZ Cleaners, does Thomas need to take 5 continuing education credits? Or is Thomas exempt since he owned Thomas' Cleaners before January 1, 2009?

When I first made this suggestion, it was to continue receiving continuing education starting July 1, 2020. Now there are 6 years left and I do not feel it's worth bringing back.

I feel it would be best to make it a suggestion/voluntary not mandated by law. If continuing education ends up being required, I would like to have another opportunity for comments before it goes into the proposed rule.

Thank you.

Sung