



The League of Women Voters of Oregon is a 100-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

April 1, 2020

To: Dan DeFehr, Rulemaking Contact  
Department of Environmental Quality  
[DeFehr.Daniel@deq.state.or.us](mailto:DeFehr.Daniel@deq.state.or.us)

Re: Proposed General Air Quality Permits – **Comments/Suggestions on AQGP-006**

Since 1968, LWVOR has been a voice on behalf of air quality. In more specific terms, the League supports adequate standards for control of all sources of pollution and strict enforcement of established rules and regulations, a comprehensive, coordinated program for management of air as a natural resource, and adequate financing for air pollution abatement programs.

In regards to dry cleaners using Perchloroethylene (Perc), we are pleased that the DEQ has made proposals that will clarify and tighten up the regulations for these operations. The dangers of Perc dry cleaning are severe and can be avoided. In order to better protect the health of workers, customers and residents throughout Oregon, we hope to see a rigorous and complete phase-out of Perc dry cleaning in the near future.

Until that time, the DEQ can and should strengthen this proposal in the following ways:

1. In 2010, a [questionnaire](#) was sent to every dry cleaner in King County, Washington of PERC machine users. Less than 40% owned or used a leak detector, although federal and state regulations required that they do so. 75% of the respondents did not know that PERC is harmful to their health. We would like to see a training component added to the regulations for Permit Number: AQGP-006, page 3 of 9:

#### **4.0 OPERATION AND MAINTENANCE REQUIREMENTS**

##### **4.1. Work Practices**

In [California, the regulations](#) are these:

**Required Good Operating Practices. No person shall operate Perc dry cleaning equipment unless all of the following requirements are met:**

**(1) *Environmental training requirements. Each Perc facility shall have one or more trained operators.***

**(A) *A trained operator shall be the owner, the operator, or another employee of the facility, who successfully completes the initial course of an environmental training program to become a trained operator. Evidence of successful completion of the initial course shall be the original record of completion issued.***

**(B) *The trained operator shall be on site while the dry-cleaning equipment is in operation.***

**(C) *Each trained operator shall successfully complete the refresher course of an environmental training program at least once every three years. Evidence of successful completion of each refresher course shall be the date of the course and the instructor's signature on the original record of completion.***

**(D) *If the Perc facility has only one trained operator and the trained operator leaves the employ of the facility, the facility shall:***

**• *Notify the district in writing within 15 days of the departure of the trained operator; and***

**• *Obtain certification for a replacement trained operator within 3 months.***

**• *If the district determines that the initial course of an environmental training program is not reasonably available, the district may extend the certification period for a replacement trained operator until 1 month after the course is reasonably available.***

2. The EPA estimates that as much as 25 percent of solvent emissions can be attributed to leaks. In order to facilitate the quick repair of leaks, we suggest these additions to Permit Number AQGP-006, page 4 of 9:

**4.5. Leak Repair**

*The permittee must repair all leaks within 24 hours of detection. If repair parts must be ordered, either a written or a verbal order for those parts must be initiated within two (2) working days of detecting such a leak. Such repair parts must be installed within five (5) working days after receipt.*

**A spare set of gaskets and a spare lint filter must be kept on site.**

**A facility with a leak that has not been repaired by the end of the 7th business day after detection shall not operate the dry cleaning machine, until the leak is repaired, without a leak-repair extension from the district.**

**The DEQ may grant a leak-repair extension to a facility, for a single period of 30 days or less, if the DEQ makes the following findings:**

- 1. The delay in repairing the leak could not have been avoided by action on the part of the facility;**
  - 2. The facility used reasonable preventive measures and acted promptly to initiate the repair;**
  - 3. The leak would not significantly increase exposure to Perc near the facility; and**
  - 4. The facility is in compliance with all other requirements and has a history of compliance.**
3. In the interest of understanding the age and type of machines currently used in order to make informed decisions about future possible regulations, we suggest this addition to Permit Number AQGP-006, page 6 of 9:

**8.0 REPORTING REQUIREMENTS****8.1. Annual Report**

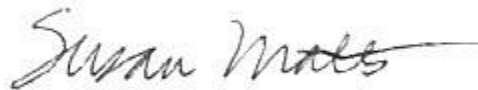
*The permittee must submit to DEQ by **February 15** of each year this permit is in effect, the following information for the preceding calendar year:*

- *A copy of one-month of logs required in Condition 7.1;*
- *A statement indicating whether or not the permittee is in compliance with each applicable requirement of this permit;*
- *A statement indicating whether all information contained in the annual report is accurate and true; and*
- *A summary of air quality related complaints received by the permittee.*
- **A report of the make, model, serial number and date of manufacture of the dry cleaning machines in use.**

We look forward to the DEQ taking action to protect cleaners and the public from the dangers of Perc dry cleaning. Thank you for the opportunity to comment on this issue.



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LWVOR President



Susan Mates  
LWVOR Air Quality Portfolio