



August 26, 2011

Robert Follmann  
1126 Highway 99N  
Eugene, OR 97402

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www.lrapa.org  
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Re: Dry cleaner registration as an alternative to permitting  
Number 205191  
Master Cleaners  
1126 Highway 99N, Eugene, OR 97402

Dear Mr. Follmann,

Based upon your application (received August 5, 2011) you are conditionally registered under LRAPA 34-025. In order to maintain your registration, you must keep records demonstrating you comply with all applicable state and federal rules and regulations, and the additional environmental protection measures you indicated on your application. These requirements are detailed in the attached document.

In addition to the annual reporting requirements detailed in section 6.0 of the attached document you also must reaffirm in writing, by March 1<sup>st</sup> of each year that you are continuing to comply with all registration requirements. Please keep a record of this registration on site for as long as you perform perchloroethylene dry cleaning, or until you obtain an air quality permit.

If you decide to discontinue your registration, or are unable to meet the requirements for registration you must submit an application for an air quality permit. LRAPA may rescind your registration if you no longer meet the requirements of LRAPA 34-025 and the conditions of registration listed in the attachment. Nothing in this registration limits the ability of LRAPA to pursue enforcement action. LRAPA will inspect your facility at some time in the future, to verify that you continue to qualify for registration and comply with all applicable rules and regulations.

If you have any questions regarding this letter, please contact John Morrissey or Max Hueftle at 541-736-1056.

Sincerely,

Sandra Lopez  
Operations Manager  
Lane Regional Air Protection Agency

## **APPLICABLE REQUIREMENTS FOR REGISTERED DRY CLEANERS**

### **1.0 GENERAL EMISSION STANDARDS AND LIMITS**

- 1.1 Nuisance and Odors** Do not cause or allow air contaminants from any source to cause a nuisance, as defined in LRAPA Title 49. Nuisance conditions will be verified by LRAPA personnel.

### **2.0 OPERATION AND MAINTENANCE REQUIREMENTS**

- 2.1 Work practices**
- a. Operate and maintain the dry cleaning system according to the manufacturers' specifications and recommendations.
  - b. Close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and keep the door closed at all other times.
  - c. Drain all cartridge filters in their housing or other sealed container, for a minimum of 24 hours, or treat such filters in an equivalent manner, before removal from the dry cleaning facility.
  - d. Store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. Cover containers for separator water except to empty the container.
- 2.2 Refrigerated condenser** Route the air-perchloroethylene stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device.
- a. Operate the refrigerated condenser to not vent or release the air-perchloroethylene stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating.
  - b. Prevent air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
- 2.3 Carbon adsorber** For each dry cleaning system purchased after December 21, 2005, route the air-perchloroethylene stream from inside the dry cleaning machine drum through a non-vented carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine is opened. Desorb the carbon adsorber in accordance with manufacturer's instructions.

- 2.4 Leak detection** Inspect the following components weekly for vapor leaks while the dry cleaning system is operating and using a halogenated hydrocarbon detector or PCE gas analyzer that is operated according to the manufacturer's instructions. Place the probe inlet at the surface of each component interface where leakage could occur and move it slowly along the interface surface.
- a. Hose and pipe connections, fittings, couplings, and valves;
  - b. Door gaskets and seatings;
  - c. Filter gaskets and seatings;
  - d. Pumps;
  - e. Solvent tanks and containers;
  - f. Water separators;
  - g. Muck cookers;
  - h. Stills;
  - i. Exhaust dampers;
  - j. Diverter valves; and
  - k. All filter housings.
- 2.5 Leak repair** Repair all leaks within 24 hours of detection. If you need to order repair parts, initiate the order within two working days of detecting such a leak. Install such repair parts within five working days after receipt.
- 2.6 Equipment repair** If the refrigerated system high pressure and low pressure are not in the range specified in the manufacturer's operating instructions or the outlet temperature does not meet the values specified in 4.1b.iii, make adjustments or repairs to the dry cleaning system or refrigerated condenser to meet those values. If you need to order repair parts, initiate the order within two working days of detecting such a parameter value. Install such repair parts within five working days after receipt.

### **3.0 ADDITIONAL ENVIRONMENTAL PRACTICES**

- 3.1 Required environmental practices** Meet the following environmental practices:
- a. All dry cleaning machines at the facility must be 4th generation dry cleaning machines or better.
  - b. Train employees on waste prevention procedures related to the following:
    - i. Compliance with environmental requirements;
    - ii. Hazardous waste management;
    - iii. Wastewater management;
    - iv. Containment under and around dry cleaning systems;

- v. Reporting releases of dry cleaning solvent; and
- vi. Delivery of perchloroethylene solvent.  
Training will be valid for a period not to exceed three years after the date training is completed. All personnel must receive refresher training every three years.
- c. Have a spill response plan acceptable to DEQ and spill response material onsite.
- d. Implement the following sustainable practices when practicable:
  - i. Recycle toner cartridges;
  - ii. Reuse office supplies such as file folders/envelopes;
  - iii. Make double-sided copies;
  - iv. Recycle or reuse product supply and packaging materials;
  - v. Provide recycling containers such as glass, aluminum, plastic, cardboard;
  - vi. Purchase at least one recycled product on a regular basis; and
  - vii. Use rechargeable batteries.

**3.2 Additional required environmental practices**

Document your participation in three of the following six additional environmental practices:

- a. Conserve energy through ongoing participation in a local utility's conservation program;
- b. Once every other year, sponsor a neighborhood cleanup, tree planting, storm drain stenciling or other environmental project in the community;
- c. Use an Energy Star rated dryer for wet cleaned fabrics;
- d. Offer customers reusable cloth garment bags;
- e. Recycle hangers and plastic bags;
- f. Ask vendors to provide alternatives to hazardous products and stop using at least one hazardous product every other year, alternatively you may demonstrate that you no longer use hazardous products other than perchloroethylene.

**4.0 COMPLIANCE DEMONSTRATION**

**4.1 Refrigerated condenser temperature monitoring**

Measure the parameters in either 4.1a or 4.1b on a weekly basis:

- a. The refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions; or

- b. The gas-vapor stream temperature on the outlet side of the refrigerated condenser using a temperature sensor.
  - i. Measure the temperature before the end of the cool-down or drying cycle and while the gas-vapor steam is flowing through the condenser.
  - ii. Use the temperature sensor according to the manufacturer's instructions.
  - iii. The refrigerated condenser is operating correctly if the measured temperature is equal to or less than 7.2°C (45°F).

## **5.0 RECORDKEEPING REQUIREMENTS**

### **5.1 Recordkeeping Logs**

Keep the following records. The Oregon Dry Cleaner Compliance Calendar or other equivalent recordkeeping log may be used for this purpose.

- a. The dates when the dry cleaning system components are inspected for leaks and the name or location of dry cleaning system components where leaks are detected;
- b. The dates of repair and records of written or verbal orders for repair parts;
- c. The date and high pressure and low pressure results, if applicable (see 4.1a);
- d. The date and temperature sensor monitoring results, if applicable (see 4.1b);

### **5.2 Additional Environmental Practices**

Keep the following records onsite to demonstrate that you are meeting the additional environmental practices.

- a. The manufacturer and model number of all dry cleaning machines at the facility;
- b. Documentation that each employee has completed training on waste prevention procedures, with the date the initial training and the most recent refresher training was completed;
- c. A record of the spill response plan. Also keep records of any updates to the spill response plan;
- d. Documentation showing that you are implementing sustainable practices;
- e. The following documentation that you are meeting three of the six additional environmental practices:
  - i. Documentation that you are participating in local utility's conservation program;

- ii. Documentation that you have sponsored a neighborhood cleanup, tree planting, storm drain stenciling or other environmental project in the community;
- iii. Documentation that you use an Energy Star rated dryer for wet cleaned fabrics;
- iv. Documentation that you offer customers reusable cloth garment bags;
- v. Documentation that you recycle hangers and plastic bags;
- vi. Documentation that you have asked vendors to provide alternatives to hazardous products and stopped using at least one hazardous product every other year, or documentation showing that you no longer use hazardous products other than perchloroethylene.

**5.3 Complaint Log** Maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the registered facility. Include a record actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

**5.4 Operating Manuals** Retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility.

**5.5 Retention of Records** Maintain all records on site for a period of five years and make them available to LRAPA upon request.

## **6.0 REPORTING REQUIREMENTS**

**6.1 Annual Report** Submit to LRAPA by **March 1** of each year the following information for the preceding calendar year:

- a. A copy of one-month of logs required in Condition 5.1;
- b. Whether or not they are in compliance with each applicable requirement of registration;
- c. Whether all information contained in the statement is accurate and true; and
- d. A summary of air quality related complaints received by the facility's owner or operator.

**6.2 Re-Registration** Reaffirm in writing, by **March 1st** of each year, that you comply with all applicable state and federal rules and regulations and the additional measures to increase environmental protection. If you have switched which three of six additional environmental practices you meet, you are required to re-register on forms furnished by the LRAPA.

- 6.3 Initial Startup Notice** Notify LRAPA in writing of the date a new facility is started up. Submit the notification no later than seven days after startup.
- 6.4 Notice of Change of Ownership or Company Name** Notify LRAPA in writing within 60 days after legal change of the name of the company as registered with the Corporations Division of the State of Oregon or sale or exchange of the facility.
- 6.5 Construction or Modification Notices** Notify LRAPA in writing using a LRAPA "Change of Dry Cleaning Activity Form" and obtain approval before:
- a. Constructing or installing a new dry cleaning system;
  - b. Modifying or altering an existing dry cleaning system that may significantly affect air emissions;
  - c. Making a physical change to a dry cleaning system which increases air emissions; or
  - d. Changing the method of operation of a dry cleaning system.

## **7.0 ADMINISTRATIVE REQUIREMENTS**

- 7.1 Re-registration**
- a. In order to maintain registration, reaffirm in the facility's annual report (see 6.1) that the facility remains qualified for registration.
  - b. Report any change in any of the factual data reported under LRAPA 34-030-3 or 4, at which time re-registration may be required on forms furnished by DEQ.
  - c. In order to re-register, a facility must not have had their registration terminated or revoked within the last 3 years, unless the air contaminant source has changed ownership since termination or revocation.
- 7.2 Reporting** Send all reports and notices to LRAPA. The address of LRAPA is:
- Lane Regional Air Protection Agency  
1010 Main St.  
Springfield, OR 97477  
Telephone: (541) 736-1056
- 7.3 LRAPA Contacts** Information about registration and LRAPA's regulations may be obtained from the LRAPA web page at [www.lrapa.org](http://www.lrapa.org).

## **8.0 FEES**

- 8.1 Annual Registration Fee** The Annual Fee in LRAPA Title 37, Table 2 for registration, is due on **March 1** of each year registration is in effect. An invoice indicating the amount will be mailed prior to March 1.
- 8.2 Where to Submit Fees** Submit fees to:  
Lane Regional Air Protection Agency  
1010 Main St.  
Springfield, OR 97477  
Telephone: (541) 736-1056

## **9.0 GENERAL REQUIREMENTS AND DISCLAIMERS**

- 9.1 Other Regulations** In addition to the specific registration requirements, comply with all other legal requirements enforceable by LRAPA.
- 9.2 Conflicting Requirements** In any instance in which there is an apparent conflict relative to specific registration requirements, the most stringent conditions apply.
- 9.3 Masking of Emissions** Do not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 9.4 LRAPA Access** Allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to registration in accordance with ORS 468-095.
- 9.5 Open Burning** Do not conduct any open burning except as allowed by LRAPA Title 47.
- 9.6 Asbestos** Comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.