

**NOTES OF A MEETING WITH DRY CLEANER OPERATORS  
AT CDPHE  
MARCH 10, 2011**

The meeting began at 7:10 PM.

About 25 dry cleaner representatives attended.

Presentations and Discussion:

**Walter Avramenko, State Hazardous Materials Unit, CDPHE**

CDPHE has seen growth of dry cleaner clean up sites.

PCE is a hazardous waste when released to the environment.

If a release, operator must report to CDPHE and next steps are regulated by state hazardous waste regulations.

Both operator of plant and owner of property are subject to regulation.

Other wastes, like hydrocarbons, are also regulated, but as a solid waste, not hazardous waste.

PERC is very mobile and persistent in the environment and difficult to clean up.

Typically, PERC release problems develop from leaks and spilling over a period of time.

Releases can occur from recent operations or from plants which operated many years in the past.

Compliance with current state regulations does not assure there will not be a cleanup problem; operations in the past may not have had good housekeeping.

Remediation of soil is easier than remediation of ground water. Sometimes soils under the building are contaminated, so remediation is difficult.

**Lauren Evans, Pinyon Environmental**

This effort grew out of frustration with the difficulties of dry cleaner remediations.

Goal is to help dry cleaners who face a clean up responsibility.

Technology for clean up of PERC sites is frequently unsuccessful.

Underground tank fund (gas stations) program has worked well in Colorado.

We researched 14 other state programs to look for good concepts.

Demographics:

EPA: 75% of dry cleaners experience a release.

Average cost to investigate and clean up is \$250,000 to \$300,000.

A release is frequently detected when the property is being refinanced or sold, and a Phase II Assessment detects significant contamination.

Discussion of why PERC is hazardous and why clean ups are needed.

Discussion of what approach is fair to dry cleaners for raising funds to help defray costs for environmental problems.

One criterion: the environmental investigation has to identify definitively the dry cleaner as the source.

*[Lauren was not able to continue her presentation due to extended attendee discussion.]*

## **Discussion Among Attendees**

Need to elevate general housekeeping at dry cleaner plants.

Needs to be standards for eligibility for access to the fund.

Bottom line is, no matter what chemical using, all of the industry has to participate if this program is to work.

Historical sites which have used PERC are part of the problem.

Shopping center owners should be part of the program.

There was considerable discussion about the experience of some attendees with cleanup issues, in Colorado and other states.

Some attendees felt that that nearby car washes could be part of the problem at some sites.

There was skepticism about the need for the current level of regulation of PERC and questions about where the standards come from.

There was some surprise that there currently are about 120 properties in the CDPHE regulatory process, with 6 to 10 new dry cleaner sites a year.

There was not consensus about to whom the fee should apply: PERC users only, per item fee, fee on gross receipts, dry cleaning vs. laundry, etc.

One attendee said that the product distributors also should be part of the program.

If the fee is spread across all the industry, then it becomes a customer-funded payment and affects all the operators equally.

This is a very competitive business; customers are very price-conscious.

One person estimated that a two percent of gross receipts fee might raise about \$2,000,000 per year.

There was a general opinion that the operators do not want the program to interfere with their business operations, but it was not clear exactly what that meant.

Need to crunch numbers for various alternatives to see if any program makes sense.

There was a comment that many dry cleaning operations are owned by persons of foreign descent, some of whom have English language difficulty.

In a show of hands, most everyone could support a minor fee, such as \$100 per year, but higher levels of fees became controversial.

There was outspoken concern about a number of program components, but it was hard to determine any trends or consensus of attendees, other than distrust of a new program.

As the discussion unfolded, there was some acknowledgement that PERC releases can be a serious burden to an operator and a matter of concern to the industry.

There was little understanding expressed about how a regulated investigation and remediation program works and the costs of these to a dry cleaner.

In the end, there was general consensus that participants cautiously want to continue the discussion.

The meeting concluded shortly before 9:00 PM