Comment 1 for Dry Cleaning (perc07) - 45 Day.

First Name: Tom
Last Name: Migliori
Email Address: karenmi@comcast.net
Affiliation:

Subject: control measure for perchloroethylene dry cleaning operations and adoption of requirements
Comment:

I am a second generation owner of a perc dry cleaning plant that was started in 1945. I have been actively involved in the business since 1968. During that time our business has been a member of the I.F.I and the Calif. Cleaners Assoc. We have been members of these associations to ensure proper representation for all levels of our business. Because of the consuming nature of a small business owners do not have the time or energy to lobby against local, state, and federal legislation. I am voicing my opinion because I think the state government, specifically CARB, has lost sight of their purpose and mission. All government organizations are civil servants, established to represent the good of consumers and the good of businesses. If this is true then CARB is failing their mission. The most important consideration must be the protection of the consumer and the employees that work in the dry cleaning industry.

The biggest injustice of CARB meetings and analysis is their lack of applying the scientific information that is available. In the last twenty years their have been several five and ten year studies on the medical hazards of perc. Of all those studies none have ever shown any conclusive evidence that perc causes cancer in humans. In fact, recently there have been extensive long term studies in Europe that conclude that perc does not increase the risk of cancer. So my question is WHY? Why are you proposing to ban perc? If you are not protecting the consumer or business, what is your agenda? Did you forget that you where established to represent the public? Your proposed legislation will have a negative impact on the consumer and the dry cleaning industry.

CARB has failed to scientifically analyze the problem, come up will a workable solution, and has failed their purpose which is the public and business. Where does the "BUCK" stop? Apparently government does not have a "BUCK" person which is why this legislation has progressed this far. Your legislation is going to be costly to the consumer and they will not be able to get the quality of service they demand. CARB has not given the dry cleaning industry alternate cleaning methods needed to provide comparable service. I will be retired before any of these issues impact me personally, but I urge you to reconsider your data. It is not too late to be a civil servant and do the "right thing".

Tom Migliori
Owner, Rite Way Cleaners
Stockton, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2006-12-26 19:32:28

No Duplicates.

Comment 2 for Dry Cleaning (perc07) - 45 Day.

First Name: Peter
Last Name: Jung
Email Address: Non-web submitted comment
Affiliation: Plaza Cleaners

Subject: Notice to Public Hearing Perchloroethylene Dry Cleaning
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/2-perc07-2.pdf

Original File Name: perc07-2.pdf

Date and Time Comment Was Submitted: 2007-01-02 15:56:07

No Duplicates.

Comment 3 for Dry Cleaning (perc07) - 45 Day.

First Name: William
Last Name: Casassa
Email Address: Non-web submitted comment
Affiliation: Marin Cleaners

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/3-perc07-3.pdf

Original File Name: perc07-3.pdf

Date and Time Comment Was Submitted: 2007-01-02 16:09:31

No Duplicates.

Comment 4 for Dry Cleaning (perc07) - 45 Day.

First Name: Elizabeth
Last Name: Cabrales
Email Address: lizcabrales@yahoo.com
Affiliation:

Subject: perc phaseout proposal
Comment:

Dear Dr. Sawyer and Board members:

I am very concerned about the use of the toxic chemical perchloroethylene (perc) used in dry cleaning.
I want to thank you and the Board for voting last May to phase out this carcinogen. Your action will help protect the cleaners, customers and our neighborhoods.

I am writing you with three requests on your current perc phaseout proposal:

1. One alternative to perc dry cleaning causes more air pollution. This is why I am also asking you to phase out new systems that use hydrocarbon solvents.
2. People should not be exposed to perchloroethylene. Instead of the 15-year phaseout in your current proposal, speed up this process to a 10-year phaseout.
3. Some people are more exposed to perc, and this must end. Require all perc dry cleaners within 300 feet of residential zones, schools, health clinics or other sensitive areas to be phased out by 2010.

Please continue to protect Californians from the health hazards of perchloroethylene by adopting these measures.

Sincerely,

Elizabeth Cabrales

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-01-04 13:20:11

146 Duplicates.

Comment 5 for Dry Cleaning (perc07) - 45 Day.

First Name: Kenney
Last Name: Slatten
Email Address: Kslatten@aol.com
Affiliation: Kenney Slatten Training Co.

Subject: Comments/suggestions on amendments for control measure for perc
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/5-perc07-5.pdf

Original File Name: perc07-5.pdf

Date and Time Comment Was Submitted: 2007-01-08 12:13:15

No Duplicates.

Comment 6 for Dry Cleaning (perc07) - 45 Day.

First Name: Marie
Last Name: Steckmest
Email Address: Harty3@verizon.net
Affiliation:

Subject: Dry cleaning chemical, perc
Comment:

```
I support the strongest possible approach to clean up dry cleaning
and protect the health of all Californians:

1. Approve a 10-year phaseout of perc, instead of its 15-year
phaseout in the current proposal.
2. Phase out new systems that use hydrocarbon solvents because
they cause smog.
3. Require all perc dry cleaners within 300 feet of residential
buildings, schools, medical facilities and other sensitive areas
to be phased out by 2010.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-01-11 07:47:58

No Duplicates.

Comment 7 for Dry Cleaning (perc07) - 45 Day.

First Name: David
Last Name: Lighthall
Email Address: drlighthall@yahoo.com
Affiliation: Central Valley Health Policy Insitutute

Subject: Perchloroethylene (Perc) Dry Cleaning ATCM proposal
Comment:

See attached letter

Attachment: www.arb.ca.gov/lists/perc07/7-2007_perc_rule_d_lighthall_1-17-07.doc

Original File Name: 2007 Perc Rule D Lighthall 1-17-07.doc

Date and Time Comment Was Submitted: 2007-01-17 10:22:17

No Duplicates.

Comment 8 for Dry Cleaning (perc07) - 45 Day.

First Name: Marshall
Last Name: Rothstein
Email Address: Non-web submitted comment
Affiliation:

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/14-perc07-8a.pdf

Original File Name: perc07-8a.pdf

Date and Time Comment Was Submitted: 2007-01-18 10:11:01

No Duplicates.

Comment 9 for Dry Cleaning (perc07) - 45 Day.

First Name: Steve
Last Name: Risotto
Email Address: srisotto@hsia.org
Affiliation: Halogenated Solvents Industry Alliance

Subject: Proposed amendments to the dry cleaning ATCM
Comment:

```
The comments of the Halogenated Solvents Industry Alliance are
attached.

Steve Risotto
HSIA
```

Attachment: www.arb.ca.gov/lists/perc07/15-hsia_comments_on_dry_cleaning_amendments.pdf

Original File Name: HSIA comments on dry cleaning amendments.pdf

Date and Time Comment Was Submitted: 2007-01-18 10:12:21

No Duplicates.

Comment 10 for Dry Cleaning (perc07) - 45 Day.

First Name: Lawrence
Last Name: Lim
Email Address: Non-web submitted comment
Affiliation: Korean Dry Cleaners Assoc. of North. CA

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/16-perc07-10.pdf

Original File Name: perc07-10.pdf

Date and Time Comment Was Submitted: 2007-01-19 09:45:34

No Duplicates.

Comment 11 for Dry Cleaning (perc07) - 45 Day.

First Name: Carol
Last Name: Cianfrini
Email Address: mrs3625@sbcglobal.net
Affiliation:

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/17-perc07-11.pdf

Original File Name: perc07-11.pdf

Date and Time Comment Was Submitted: 2007-01-19 10:33:00

No Duplicates.

Comment 12 for Dry Cleaning (perc07) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 13 for Dry Cleaning (perc07) - 45 Day.

First Name: Larry
Last Name: Allen
Email Address: Non-web submitted comment
Affiliation: CAPCOA

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/121-perc07-13.pdf

Original File Name: perc07-13.pdf

Date and Time Comment Was Submitted: 2007-01-22 08:57:43

No Duplicates.

Comment 14 for Dry Cleaning (perc07) - 45 Day.

First Name: Lynnette
Last Name: Watterson
Email Address: H2OSONS@aol.com
Affiliation: Crystal Cleaning Center

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/144-perc07-14.pdf

Original File Name: perc07-14.pdf

Date and Time Comment Was Submitted: 2007-01-22 11:01:15

No Duplicates.

Comment 15 for Dry Cleaning (perc07) - 45 Day.

First Name: Janis
Last Name: Sadler
Email Address: Sadlerx2000@msn.com
Affiliation: Norge Cleaners

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/145-perc07-15.pdf

Original File Name: perc07-15.pdf

Date and Time Comment Was Submitted: 2007-01-22 11:12:59

No Duplicates.

Comment 16 for Dry Cleaning (perc07) - 45 Day.

First Name: Annelle
Last Name: Grajeda
Email Address: Non-web submitted comment
Affiliation: SEIU, Local 660

Subject: Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/165-perc07-17.pdf

Original File Name: perc07-17.pdf

Date and Time Comment Was Submitted: 2007-01-22 11:28:58

No Duplicates.

Comment 17 for Dry Cleaning (perc07) - 45 Day.

First Name: Jason
Last Name: Dietmeyer
Email Address: email_dietmeyer@yahoo.com
Affiliation:

Subject: Help California get rid of a dangerous carcinogen and one of the state's top 10 air conta
Comment:

Jason Dietmeyer
2225 San Jose Avenue
Clovis, CA 93611-5903

January 19, 2007

Dr. Sawyer and Board members

Dear Dr. Sawyer and Board members:

I am very concerned about the use of the toxic chemical perchloroethylene (perc) used in dry cleaning. I want to thank you and the Board for voting last May to phase out this carcinogen. Your action will help protect the cleaners, customers and our neighborhoods.

I am writing you with three requests that will strengthen your current perc phaseout proposal:

1. People should not be exposed to perchloroethylene. Instead of the 15-year phaseout in your current proposal, speed up this process to a 10-year phaseout. 2. One alternative to perc dry cleaning causes smog. This is why I am also asking you to phase out new systems that use hydrocarbon solvents. 3. To provide immediate protection to those who need it most, require perc dry cleaners within 300 feet of residential zones, schools, medical facilities or other sensitive areas to be phased out by 2010.

Please continue to protect Californians from the health hazards of perchloroethylene by adopting these measures. Thank you.

Sincerely,

Jason Dietmeyer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-01-22 11:29:43

No Duplicates.

Comment 18 for Dry Cleaning (perc07) - 45 Day.

First Name: Tim
Last Name: Carmichael
Email Address: tim@coalitionforcleanair.org
Affiliation:

Subject: Dry Cleaning ATCM
Comment:

```
Statement on behalf of the following organizations:
COALITION FOR CLEAN AIR &#8729; CALIFORNIA COMMUNITIES AGAINST
TOXICS LAANE &#8729; AMERICAN LUNG ASSOCIATION OF CALIFORNIA
&#8729; NRDC &#8729;
WORKSAFE &#8729; COALITION FOR A SAFE ENVIRONMENT &#8729; SOUTHERN
CALIFORNIA WATERSHED ALLIANCE &#8729; CENTER FOR PUBLIC
ENVIRONMENTAL OVERSIGHT &#8729; STEVEN AND MICHELE KIRSCH
FOUNDATION  PEOPLE FOR PARKS &#8729; EARTH DAY L.A. &#8729; ACTION
NOW &#8729;   PHYSICIANS FOR SOCIAL RESPONSIBILITY-LA &#8729;
WILLIAM C. VELÁSQUEZ INSTITUTE &#8729; MUJERES DE LA TIERRA
&#8729; CALIFORNIA ENVIRONMENTAL RIGHTS ALLIANCE &#8729; PLANNING
AND CONSERVATION LEAGUE &#8729; CLEAN POWER CAMPAIGN &#8729; CEERT
&#8729; NATIONAL DISEASE CLUSTERS ALLIANCE &#8729; ENVIRONMENT
CALIFORNIA &#8729; BREAST CANCER ACTION &#8729; BREAST CANCER FUND
&#8729; MOMS - MAKING OUR MILK SAFE &#8729; CENTER FOR
ENVIRONMENTAL HEALTH &#8729; PADRES UNIDOS DE MAYWOOD &#8729;
CLEAN WATER ACTION &#8729; COMMUNITIES FOR A BETTER ENVIRONMENT
&#8729; COMMUNITY WATER CENTER &#8729; RESIDENTS OF PICO RIVERA
FOR ENVIRONMENTAL JUSTICE &#8729; FRESNO METRO MINISTRY &#8729;
MEDICAL ADVOCATES FOR HEALTHY AIR  &#8729; EL COMITE PARA EL
BIENESTAR DE EARLIMART
```

Attachment: www.arb.ca.gov/lists/perc07/185-2007dry_cleaning_regorderwg_coments012507.pdf

Original File Name: 2007Dry Cleaning RegOrderwg_Coments012507.pdf

Date and Time Comment Was Submitted: 2007-01-22 15:53:49

No Duplicates.

Comment 19 for Dry Cleaning (perc07) - 45 Day.

First Name: Jon
Last Name: Meijer
Email Address: meijerj@ifi.org
Affiliation: International Fabricare Institute

Subject: January 25 hearing to consider amendments to the existing dry cleaning regulation
Comment:

```
Here is my re-submittal of comments.

Thank you,

Jon
```

Attachment: www.arb.ca.gov/lists/perc07/187-carb_comments_jan_2006a.doc

Original File Name: CARB Comments Jan 2006A.doc

Date and Time Comment Was Submitted: 2007-01-23 12:13:54

No Duplicates.

Comment 20 for Dry Cleaning (perc07) - 45 Day.

First Name: Peter
Last Name: Sinsheimer
Email Address: psinshei@oxy.edu
Affiliation: Occidental College

Subject: The Viability of Professional Wet Cleaning as a Pollution Prevention Alt. to Perc.
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/190-perc07-19.pdf

Original File Name: perc07-19.pdf

Date and Time Comment Was Submitted: 2007-01-23 13:04:07

No Duplicates.

Comment 21 for Dry Cleaning (perc07) - 45 Day.

First Name: Claude
Last Name: Turpin
Email Address: Non-web submitted comment
Affiliation:

Subject: Amendments to the Dry Cleaning ATCM
Comment:

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Please see the attached comment.
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Attachment: www.arb.ca.gov/lists/perc07/196-perc07-20.pdf

Original File Name: perc07-20.pdf

Date and Time Comment Was Submitted: 2007-01-23 14:36:17

No Duplicates.

Comment 22 for Dry Cleaning (perc07) - 45 Day.

First Name: Barry
Last Name: Bosshard
Email Address: Barrybosshard@aol.com
Affiliation: I.D.C., I.F.I, C.C.A., R.E.D.C.A.

Subject: TITLE 17 PROPOSED ATCM AMENDMENT FOR Perc 07
Comment:

January 23, 2007

Clerk of the Board
Air Resources Board
1001 I Street, 23rd Floor
Sacramento Ca. 955814

Dear Members of the Board,

My name is Barry Bosshard and I am an owner of Off Broadway Cleaners. We have been in the Dry-cleaning business in Sonoma for 50 years. I personally have worked in the cleaning business 40 years. In those years, I have used various solvents including Carbon tetrachloride, Petroleum based Stoddard Solvent, Perchlorethelene, Fluorocarbon, and Wet-cleaning. Each of these solvents have their own benefits and problems.

It has been my experience that Perc delivers the best quality cleaning and is the least harmful of all to the environment. The arguments in favor of eliminating the use of this solvent, in my understanding, are two-fold. The first argument and the most serious is that it is a carcinogen. Numerous studies have been performed in this regard since the early 1980's. The general conscientious of all these studies is that as the Federal EPA has determined it is a Possible Human Carcinogen . This is the lowest category of potential chemical threat to humans.

The second argument is that it is a toxic chemical. This classification refers to the fact that overexposure to the fumes and or liquid can be physically impairing and injurious. This, I believe, is the real threat. Over the last 40 years, the Time Weighted Average exposure level has been reduced from 1,000 ppm in the 1960's to the current level of 25 ppm in the 1990's through technological advances and regulations. If this level is maintained as current regulations require, not only is there no toxic effect experienced by employees of the facility, humans cannot even smell it at this concentration.

In reality, any solvent can be dangerous if it is not used sensibly and with extreme caution. The Dry-cleaning Industry has done an outstanding job in increasing efficiency in the process.

The amount of Perc used by the industry has been reduced by over 90 percent through Best Available Control Technology. In my own personal experience my usage has gone down from 150 gallons a week to less than 100 gallons a year. Your statistical study of the industry confirms this point.

The alternative solvents that you are considering as a replacement for the industry also have their own risks and environmental threats associated with them. Petroleum based Hydrocarbon Solvents is highly combustible. This presents a serious and real explosive risk. To lower this risk the newer petroleum hydrocarbon solvents have a higher flash - point or ignition temperature. The new equipment in some cases also removes the oxygen in the cleaning machine and replaces it with nitrogen to lower the risk of explosion. Although these technological improvements may reduce the risk it does not eliminate it altogether. Perchlorethelene is a non-flammable liquid with no explosive risk.

Petroleum based Hydrocarbon Solvents are photo-chemically reactive and smog producing. This is an environmentally known pollutant that depletes the ozone layer. Why you would recommend its increased use at a time when all other efforts of your regulations is to reduce these emissions, does not make sense to me. Perchlorethelene on the other hand is not photo-chemically reactive and does not create smog.

Finally, Petroleum based Hydrocarbon Solvents are also Toxic and depending on the chemical make-up possible, if not probable, human carcinogens if they contain Benzene, Radon or other carcinogens that are common in petroleum based products. These are all environmental reasons the dry-cleaning industry has adopted this solvent as the best cleaning solvent with the least environmental and physical risk factors.

The other alternative solvents that are being considered also have environmental and physical risks associated with them. I must say that I am confused, when daily I read of the environmental impact of Carbon Dioxide to the environment, and the recent legislation that we need to reduce its emissions and your document considers it as an alternative for the dry-cleaning industry.

Wet-cleaning processes can clean up to a maximum of 33 percent of the garments we process. This does not consider how we are to clean the other 67 percent of our cleaning volume. I also do not see in your consideration the environmental impact of the wastewater generated by these processes and the chemical additives. This wastewater will be released into the sewer system and groundwater eco-system.

I strongly suggest that you reconsider this proposed amended regulation until all the environmental effects of the proposed alternatives have been explored completely with input from all concerned constituencies.

Respectfully,

Barry Bosshard C.E.D, C.P.D.
President
Off Broadway Cleaners

19485 Sonoma Hwy. Sonoma, CA 95476 (707) 938-2327

Fax (707) 938-2306

Attachment: www.arb.ca.gov/lists/perc07/197-letter_atcm.rtf

Original File Name: LETTER ATCM.rtf

Date and Time Comment Was Submitted: 2007-01-23 15:49:37

No Duplicates.

Comment 23 for Dry Cleaning (perc07) - 45 Day.

First Name: Sandra
Last Name: Giarde
Email Address: cca@camgmt.com
Affiliation: California Cleaners Assoc.

Subject: Proposed changes to the ATCM regulating perc
Comment:

```
Please find attached our comments on the proposed changes to the
ATCM regulating perc.

Sincerely,

Sandra Giarde
California Cleaners Association
```

Attachment: www.arb.ca.gov/lists/perc07/198-cca_2007_atcm_comments.pdf

Original File Name: CCA 2007 ATCM comments.pdf

Date and Time Comment Was Submitted: 2007-01-23 16:36:29

No Duplicates.

Comment 24 for Dry Cleaning (perc07) - 45 Day.

First Name: Larry
Last Name: Wrinkle
Email Address: lwrinkle@mindspring.com
Affiliation: Village Cleaners (Folsom)

Subject: Proposed changes to Calif Air Toxics Control Measure
Comment:

```
I have been in the dry cleaning business since 1994 and have
complied with all environmental requirements.  I have a closed
loop perc machine that is about 20 years old.

If these changes are adopted as submitted, it will force me out of
business.  I will be in no position to sell my business to any
interested buyer.  Therefore, I will lose everything.

Please do not adopt this measure.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-01-23 17:38:00

No Duplicates.

Comment 25 for Dry Cleaning (perc07) - 45 Day.

First Name: Geoff
Last Name: Yost
Email Address: gyost@thelen.com
Affiliation:

Subject: Drycleaning ATCM
Comment:

See Attached Comment Letter

Attachment: www.arb.ca.gov/lists/perc07/200-carb_comment_letter_2.pdf

Original File Name: CARB comment letter 2.pdf

Date and Time Comment Was Submitted: 2007-01-24 06:15:10

No Duplicates.

Comment 26 for Dry Cleaning (perc07) - 45 Day.

First Name: Bill
Last Name: Magavern
Email Address: magavern@sierraclub-sac.org
Affiliation: Sierra Club California

Subject: Dry Cleaning ATCM
Comment:

January 24, 2007

California Air Resources Board
1101 I Street
Sacramento, CA 95814

Re: Dry Cleaning ATCM

Dear Board Members:

Sierra Club California thanks the Air Resources Board for ordering a phaseout of Perchloroethylene (PCE) from dry cleaning. Studies of currently available alternative systems indicate that alternative solvents in commercial use today successfully clean as full a range of garments as PCE. Non-PCE alternatives are just as cost-effective or more cost-effective than PCE systems. Moreover, there is no question that the alternative solvent systems are commercially feasible and in broad use within the United States and in other countries. Therefore, California should make the transition away from PCE as soon as possible and assure that replacement systems are safe. We believe the phaseout period for PCE machines should be reduced to 10 years to protect workers and the public.

Alternative solvent systems such as wet-cleaning evolved from emerging technologies to commercially viable systems that have taken their place as established technologies in the industry. Numerous studies and reports regarding alternative solvent systems demonstrate that such systems are comparable to PCE systems in quality of cleaning, range of garments cleaned, and cost. As a result, it is now achievable for dry cleaners to eliminate PCE emissions through process changes and substitution of materials. Specifically, when dry cleaners' PCE machines wear out, they can replace those machines with machines that use non-PCE alternatives. Moreover, they can do so cost-effectively and at no greater cost than using PCE machines.

A quicker phaseout of PCE is justified by research findings that point to a 10-year life expectancy for PCE machines. In 2000, William Fisher, Chief Executive Officer at International Fabricare Institute, testified to the US House of Representatives Subcommittee that the anticipated life of a PCE machine is "eight to 12 to 14 years" depending on the model.

During its 2001 rulemaking on the phase-out of PCE, the South Coast Air Quality Management District initially proposed a phase out of Perc dry cleaning systems that allowed machines a lifetime of nine to 10 years. In 2005, the Eastern Research Group (ERG), which provided background information for USEPA's development of the current National Emissions Standards for Hazardous Air Pollutants (NESHAP), quantified the "Economic Life" for a dry cleaning machine as 10 years. In a Memorandum dated May 16, 2005 to US EPA's Rhea Jones, ERG's Eric Goehl and Mike Heaney note that the "life of a dry cleaning machine was determined during the development of the current NESHAP."

Additionally, we believe that a full implementation of AB 998 (Lowenthal, 2003) will decrease the actual cost of the transition to safer substitutes. AB 998, which we supported, directed ARB to apply a fee on the PCE used in dry cleaning to establish a demonstration program for non-toxic, non-smog forming alternatives, and use the additional funds for grants to cleaners making the transition from PCE to these safer alternatives.

Our understanding is that more than three years after this law took effect ARB: 1) is still not fully collecting fees on all the PCE used by California dry cleaners, 2) has not initiated a single demonstration program, and 3) has only made 23 grants in a state with almost 5,000 dry cleaners. ARB can do more to support cleaners' transition by fully implementing AB 998.

Despite the extraordinary toxicity of PCE, many Americans are unaware of the health risks created by exposure to PCE emissions. This risk is especially high for people who live in the same building as a PCE dry cleaner. The risks are also especially high for people who spend any time in the same building as a PCE dry cleaner – e.g. children who go to a day care center in the same building as a PCE dry cleaner – and for the neighbors of a PCE dry cleaner. Therefore, we support the draft proposal's requirement for removal of all PCE machines from co-residential locations, and we ask the Board to expedite the removal of PCE machines that are located in close proximity to homes, schools, day care centers and other sensitive sites.

Sincerely,

Bill Magavern
Senior Representative

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-01-24 09:30:23

No Duplicates.

Comment 27 for Dry Cleaning (perc07) - 45 Day.

First Name: Barry
Last Name: Wallerstein
Email Address: bwallerstein@aqmd.gov
Affiliation: SCAQMD

Subject: Proposed Amendments of Perchloroethylene
Comment:

```
Proposed Amendments to the Airborne Toxic Control Measure for
Emissions of Perchloroethylene Associated with Dry Cleaning
Operations and Proposed Adoption of Requirements for Manufacturers
and Distributors of Perchloroethylene
```

Attachment: www.arb.ca.gov/lists/perc07/202-012307_ltr_to_carb_re_proposed_amendments_for_perc.pdf

Original File Name: 012307 Ltr to CARB re Proposed Amendments for Perc.pdf

Date and Time Comment Was Submitted: 2007-01-24 09:56:28

No Duplicates.

Comment 28 for Dry Cleaning (perc07) - 45 Day.

First Name: Richard
Last Name: Wales
Email Address: rwales@mdaqmd.ca.gov
Affiliation: Mojave Desert AQMD

Subject: Comments on ATCM for Dry Cleaners
Comment:

```
Dear Clerk of the Board:

The Mojave Desert Air Quality Management District (MDAQMD) would
like to thank the California Air Resource Board (CARB) for the
opportunity to comment on the proposed changes to the Airborne
Toxic Control Measure (ATCM) for Dry Cleaners, Title 17 CCR 93109.
 The attached PDF File has the signed copy of the letter.
```

Attachment: www.arb.ca.gov/lists/perc07/203-comment_ltr_20070124.doc

Original File Name: Comment_LTR_20070124.doc

Date and Time Comment Was Submitted: 2007-01-24 10:04:52

No Duplicates.

Comment 29 for Dry Cleaning (perc07) - 45 Day.

First Name: Richard
Last Name: Wales
Email Address: rwales@mdaqmd.ca.gov
Affiliation: Antelope Valley AQMD

Subject: Comments on ATCM for Dry Cleaners
Comment:

```
Dear Clerk of the Board:

The Antelope Valley Air Quality Management District (AVAQMD) would
like to thank the California Air Resource Board (CARB) for the
opportunity to comment on the proposed changes to the Airborne
Toxic Control Measure (ATCM) for Dry Cleaners, Title 17 CCR 93109.
 The attached PDF File has the signed copy of the letter.
```

Attachment: www.arb.ca.gov/lists/perc07/204-comment_ltr_20070124_av.doc

Original File Name: Comment_LTR_20070124_AV.doc

Date and Time Comment Was Submitted: 2007-01-24 10:06:12

No Duplicates.

Comment 30 for Dry Cleaning (perc07) - 45 Day.

First Name: David
Last Name: Cotter
Email Address: david@tcata.org
Affiliation: Textile Care Allied Trades Assn.

Subject: Proposed Amendments for Perchlorethylene Drycleaning Operations
Comment:

```
Attached please find the comments of the Textile Care Allied Trades
Association for the January 25, 2007 hearing on perchlorethylene
use.
```

Attachment: www.arb.ca.gov/lists/perc07/205-carb_atcm_comments_2007.doc

Original File Name: carb atcm comments 2007.doc

Date and Time Comment Was Submitted: 2007-01-24 10:16:46

No Duplicates.

Comment 31 for Dry Cleaning (perc07) - 45 Day.

First Name: Tom
Last Name: Weeks
Email Address: Cara.Bandera@sdcounty.ca.gov
Affiliation: SDCAPCD

Subject: Comments on the Proposed Changes to the Dry Cleaning ATCM
Comment:

```
Attached are the San Diego County Air Pollution Control District's
comments on the proposed changes to the ATCM for Perchloroethylene
Dry Dleaning Operations.
```

Attachment: www.arb.ca.gov/lists/perc07/206-comments_dry_cleaning_2007_hearing-final.doc

Original File Name: Comments Dry Cleaning 2007 Hearing-final.doc

Date and Time Comment Was Submitted: 2007-01-24 10:18:29

No Duplicates.

Comment 32 for Dry Cleaning (perc07) - 45 Day.

First Name: Paul
Last Name: Martyn
Email Address: pmartyn@lacsd.org
Affiliation:

Subject: PERC07
Comment:

```
Comments on Proposed Amendments to the Airborne Toxic Control
Measure for Emissions of Perchloroethylene Assocated with Dry
Cleaning Operations and Proposed Adoption of Requirements for
Maintenance and Distributors of Perchloroethylene
```

Attachment: www.arb.ca.gov/lists/perc07/208-carb_emissions_of_perchlorethylene.pdf

Original File Name: CARB Emissions of Perchlorethylene.pdf

Date and Time Comment Was Submitted: 2007-01-24 11:22:47

No Duplicates.

Comment 33 for Dry Cleaning (perc07) - 45 Day.

First Name: Jack
Last Name: Broadbent
Email Address: Non-web submitted comment
Affiliation: BAAQMD

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/213-perc07-31.pdf

Original File Name: perc07-31.pdf

Date and Time Comment Was Submitted: 2007-01-24 12:02:24

No Duplicates.

Comment 34 for Dry Cleaning (perc07) - 45 Day.

First Name: Edwin
Last Name: Krantz
Email Address: Non-web submitted comment
Affiliation:

Subject: Amendments to the Dry Cleaning ATCM
Comment:

Please see the attached comment.

Attachment: www.arb.ca.gov/lists/perc07/214-perc07-32.pdf

Original File Name: perc07-32.pdf

Date and Time Comment Was Submitted: 2007-01-24 12:03:45

No Duplicates.

Comment 35 for Dry Cleaning (perc07) - 45 Day.

First Name: Peter
Last Name: Sinsheimer
Email Address: psinshei@oxy.edu
Affiliation: Occidental College

Subject: ATCM Comment
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/215-p._sinsheimer.zip

Original File Name: P. Sinsheimer.zip

Date and Time Comment Was Submitted: 2007-01-24 13:41:07

No Duplicates.

Comment 1 for Dry Cleaning (perc07). (At Hearing)

First Name: John
Last Name: Horst
Email Address: Non-web submitted comment
Affiliation: Margaret's Cleaners

Subject: Comments to CAR Board meeting
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/216-perc07-ws-1.pdf

Original File Name: perc07-ws-1.pdf

Date and Time Comment Was Submitted: 2007-01-26 15:05:22

No Duplicates.

Comment 2 for Dry Cleaning (perc07). (At Hearing)

First Name: Jill
Last Name: Whynot
Email Address: jwhynot@aqmd.gov
Affiliation: AQMD

Subject: CARB Public Hearing - Dry Cleaning ATCM
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/217-perc07-ws-2.pdf

Original File Name: perc07-ws-2.pdf

Date and Time Comment Was Submitted: 2007-01-26 15:07:58

No Duplicates.

Comment 3 for Dry Cleaning (perc07). (At Hearing)

First Name: Jack
Last Name: Alquist
Email Address: Non-web submitted comment
Affiliation: Guild Cleaners Inc.

Subject: Presentation to the Board
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/218-perc07-ws-3.pdf

Original File Name: perc07-ws-3.pdf

Date and Time Comment Was Submitted: 2007-01-26 15:09:31

No Duplicates.

Comment 4 for Dry Cleaning (perc07). (At Hearing)

First Name: Gordon
Last Name: Shaw
Email Address: Non-web submitted comment
Affiliation: Hangers Cleaners

Subject: January 25 ARB Testimony
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/219-perc07-ws-4.pdf

Original File Name: perc07-ws-4.pdf

Date and Time Comment Was Submitted: 2007-01-26 15:11:50

No Duplicates.

Comment 5 for Dry Cleaning (perc07). (At Hearing)

First Name: Peter
Last Name: Sinsheimer
Email Address: psinshei@oxy.edu
Affiliation: Occidental College

Subject: Professional Wet Cleaning as a Viable Substitute for PERC Dry Cleaning
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/220-perc07-ws-5.pdf

Original File Name: perc07-ws-5.pdf

Date and Time Comment Was Submitted: 2007-01-26 15:14:40

No Duplicates.

Comment 6 for Dry Cleaning (perc07). (At Hearing)

First Name: James
Last Name: Lyons
Email Address: jlyons@sierraresearch.com
Affiliation: Sierra Research

Subject: Notice to Public Hearing to Consider Amendments to the Control Measure for PERC
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/221-perc07-ws-6.pdf

Original File Name: perc07-ws-6.pdf

Date and Time Comment Was Submitted: 2007-01-26 15:17:55

No Duplicates.

Comment 7 for Dry Cleaning (perc07). (At Hearing)

First Name: Robert
Last Name: Smerling
Email Address: Non-web submitted comment
Affiliation: Brentwood Royal Cleaners

Subject: Liquid Carbon Dioxide Cleaning Machine
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perc07/222-perc07-ws-7.pdf

Original File Name: perc07-ws-7.pdf

Date and Time Comment Was Submitted: 2007-01-26 15:19:54

No Duplicates.

Comment 8 for Dry Cleaning (perc07). (At Hearing)

First Name: Jennifer
Last Name: Saklar
Email Address: Non-web submitted comment
Affiliation:

Subject: Amendments to the Dry Cleaning ATCM
Comment:

```
Form Letters submitted by:

Jennifer Saklar
Dyuk Rubi
Lee Paduchette
Carolyn Hamilton
Debra Sharpe
Catherine Garoupa
James White
Daniel Menchaca Gamino
Andy Hansen-Smith
Ingrid Carmean
Patrick Moyle
Katya Ranos
Liza Bolanos
Jamie Ortega
Harriet Kraus
Melissa Kelly-Ortega
Fernando Lara
Oscar Martin Chow
Diane Mettam
Debbie Fagen
Sherrie Fenton
Marnie Gaede
Eric Gersh
Ralph Perry
George Meskus
Alex Lozano
Ernestine Monsour
Christina Diaz
Socorro Mumoz
Olga Coderon
F. Castillo
Carmen Galvaa
E. Mumoz
```

Attachment: www.arb.ca.gov/lists/perc07/223-perc07-ws-8.pdf

Original File Name: perc07-ws-8.pdf

Date and Time Comment Was Submitted: 2007-01-26 15:31:47

No Duplicates.

Comment 1 for Dry Cleaning (perc07) - 15-1.

First Name: Jose
Last Name: Santana
Email Address: eldorado10@sbcglobal.net
Affiliation:

Subject: Alternative solutions
Comment:

Dear Sirs,
I am concerned at the exclusion of Greenearth as an alternative solution for perc.I have a Greenearth plant and previously had a perc plant, I shut it down. I believe it would be a great alternative solution for those cleaners whom cannot afford co2. It views greater effort by GE with Greenearth at various levels investigating the probabilities of hazards compared to the other solvents coming to market whom may pose a greater risk if all cleaners jump to them upon changeout of perc.A high percentage due to affiliate fees from Greenearth. A acceptance with further review would be a reccomended proceedure. Possibly with a wetcleaning adjacent concept inclusion for approval. In example; Greenearth applicants must also show a wetcleaning process proceedure install of at least one wetcleaning alternative machine to process a minimum of 30% cleaning. A complete wetcleaning facility 100% is not a proper method of properly cleaning professionally until all clothing manufacturers adopt a care label rule for such. Please adopt Greenearth as an accepted alternative from perc.

Thank you,
Jose Santana

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-22 16:27:55

No Duplicates.

Comment 2 for Dry Cleaning (perc07) - 15-1.

First Name: John
Last Name: Park
Email Address: Non-web submitted comment
Affiliation: Korean Dry Cleaners Assn. of Sacramento

Subject: 15-day Comments on Amendments to the Control Measure for Perchloroethylene Dry Cleaning
Comment:

```
Please see the attached comment. The original comment was received
in Korean and translated.
```

Attachment: www.arb.ca.gov/lists/perc07/225-perc07-15day-2.pdf

Original File Name: perc07-15day-2.pdf

Date and Time Comment Was Submitted: 2007-04-17 10:05:49

No Duplicates.