CAPCOA
CALIFORNIA AIR POLLUTION CONTROL OFFICERS ASSOCIATION

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Lori Anderson
Bob Sawyer

May 19, 2006

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Dr. Robert Sawyer, Chairman
California Air Resources Board
1001 J Street
Sacramento, CA

Re: Proposed Amendments to the Airborne Toxic Control Measure (ATCM) for Emissions of Perchloroethylene from Dry Cleaning Operations

The California Air Pollution Control Officers Association (CAPCOA) supports your staff's effort to further protect public health by reducing perchloroethylene (perc) emissions from dry cleaning operations in California.

As you know the current ATCM adopted by the ARB and enforced and implemented by local air districts has already reduced statewide perc emissions by 70 percent. The proposed amendments are expected to further reduce statewide perc emissions by at least 730,000 pounds per year. More noteworthy, these amendments will reduce the associated public health risk by 50 to 70 percent for most facilities throughout the state, and by 100 percent for facilities that share a wall with a residence or are located within residential buildings. Although a complete phase-out of perc is preferable, given the significant reduction in public health risk that can be realized in a nearer term from the proposed amendments, CAPCOA supports ARB staff's recommendation. We also appreciate your staff's proposal to allow the South Coast AQMD to retain its current rule on perc dry cleaners requiring a complete phase out of perc by December 31, 2020.

However, please note that one of our members, the South Coast Air Quality Management District (SCAQMD), has a different position on this ATCM. CAPCOA does not represent the SCAQMD in this letter; they may provide their own letter to the ARB articulating their position.

Along with the support, we ask that ARB continue to explore additional measures to further reduce public health risk from this source category. We ask this because the residual risk from most facilities, even after full compliance with the proposed amendments, will be very high. In fact, in many areas of California, the risk to the public from dry cleaning facilities will far exceed the risk from large manufacturing facilities regulated by the local air districts. Specifically, we ask that ARB prepare a written report on feasibility of complete perc phase-out by

December of 2008. This report can then be utilized by the ARB and/or the local air districts to explore further risk reduction measures.

Lastly, as a practical matter, should CARB consider a ban on hydrocarbon (HC) alternatives, even in a limited sense, CAPCOA could not support such an approach for the following reasons: (1) from a toxic standpoint, HC could substantially reduce risk as compared to perc; (2) HC increases would be very small. (For attainment air districts, HC increases could be accommodated without impacting attainment status; for non-attainment air districts, slight HC increases can be accommodated without undue effects on the attainment process); (3) some areas, such as Bay Area, have already seen significant penetration of HC dry cleaning processes; and (4) there could be unintended consequences of having HC users switch to perc, thus resulting in significant increases in toxic risk.

We appreciate the opportunity to offer these comments and look forward to working with ARB to implement the currently proposed control measure.

Sincerely,

Barbara A. Lee

CC: Ms. Catherine Witherspoon, ARB Executive Officer
CAPCOA Members