UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 24, 2006

Clerk of the Board
Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814

To Whom It May Concern:

U.S. EPA Region 9 appreciates the opportunity to comment on the California Air Resources Board's proposed amendment to the Control Measure for Perchloroethylene Dry Cleaning Operations. EPA shares CARB's concerns over the risks posed by perchloroethylene emissions. We support a gradual phase out of perchloroethylene from a pollution prevention perspective, based on the health effects of perchloroethylene and the availability of viable alternative technologies.

The health effects associated with perchloroethylene include chronic cancer, chronic non-cancer, and acute exposure effects. In the mid-1980's, EPA considered the epidemiological and animal evidence on perchloroethylene as "intermediate between a probable and possible human carcinogen." The main effects of perchloroethylene in humans are neurological, liver and kidney effects, following short- term and long-term inhalation exposure. Results from epidemiological studies of dry cleaners that were occupationally exposed to perchloroethylene suggest increased risks from several types of cancer. Animal studies have reported an increased incidence of liver cancer in mice, via inhalation and ingestion. Other studies indicate increased incidence of kidney cancer and leukemia in rats.

We are also concerned about perchloroethylene's byproduct, TCE. TCE is among the most commonly found chemicals at Superfund sites. TCE has caused extensive drinking water and ground water contamination. While many costs are cited in CARB's proposal, the report does not acknowledge the significant costs associated with clean-up of perchloroethylene contamination or the cost of healthcare and lost wages due to the health effects of perchloroethylene exposure. Any final measure would ideally include a clear analysis of financial costs associated with TCE contamination from continued dry cleaning use.

EPA's Design for the Environment Program has partnered with the dry cleaning industry to promote environmentally preferable technologies for garment and textile care. As a result of demonstration projects and other industry efforts, EPA has found there are several viable technologies that can be used in lieu of perchloroethylene including: wetcleaning, liquid CO2, and hydrocarbon cleaning. In addition, USEPA Region 9 has funded several research, training and demonstration projects on perchloroethylene alternatives. These projects have successfully

shown that there are other technologies which are cost-effective and safer options for human health and the environment than traditional perchloroethylene based dry cleaning.

Given both concerns about perchloroethylene's health effects and the availability of alternatives, EPA, under the Pollution Prevention Act of 1990, supports reducing pollution at the source whenever possible. Since viable alternatives posing fewer risks do exist, EPA, from the pollution prevention perspective, urges CARB to support a gradual phase out requirement - Alternative 3 in your staff report. We supported South Coast AQMD's gradual phase-out of [illegible] that there may be a cancer hazard associated with D5. In addition to the cancer study, EPA received a series of studies that Dow Corning conducted to determine the specific mode of action for the D5-induced uterine tumors in rats. This information may help determine whether a potential carcinogenic hazard is associated with D5 for humans. EPA is in the process of evaluating these studies and anticipates that the mode of action analysis will be complete by the end of 2006. After evaluating the mode of action analysis, EPA, in consultation with other relevant Federal agencies, will determine whether it is appropriate to conduct a risk assessment on D5. However the Agency has not conducted a risk assessment for D5, and, therefore, is not in a position to characterize potential risk to human health or the environment associated with D5 use in drycleaning.

EPA supports a phase-out of perchloroethylene to prevent pollution and encourages the use of effective alternatives. We applaud CARB for addressing this important issue. CARB has an opportunity to provide leadership by adopting a phase out of perchloroethylene dry cleaning and we encourage you to adopt alternative 2.

Sincerely,

for Jeff Scott
Director
Waste Management Division
U.S. EPA Region IX