



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

January 24, 2007

Dr. Robert F. Sawyer, Chair  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

Dear Dr. Sawyer:

I am pleased to express the support of the Bay Area Air Quality Management District for the proposed amendments to the Airborne Toxic Control Measure (ATCM) for Emissions of Perchloroethylene from Dry Cleaning Operations that are scheduled for consideration of adoption on January 25, 2007.

We believe that the proposed phase-out of perchloroethylene is justifiable to protect public health because of the typical close proximity of these facilities to residents and other workers, and the availability of several alternative dry cleaning solvents that have proven viable. Most of the co-residential dry cleaning facilities in California are located in the Bay Area, and these facilities typically represent the highest risk for nearby residents.

The proposed amendments to the ATCM would accelerate conversion of dry cleaners to non-perchloroethylene alternatives – a trend that is well underway, with an estimated one-third of the dry cleaners in the Bay Area already having been converted. Based on the proposed ATCM standards, we expect that perchloroethylene will be discontinued at an additional 340 Bay Area facilities by July 2010, representing another one-third of our dry cleaners. The final one-third of Bay Area dry cleaners would convert from perchloroethylene gradually over the last 13 years of the compliance schedule.

Thank you for the opportunity to provide our comments on the proposed amendments to this important ATCM. The ARB staff is also to be commended on their excellent work during the rule development process.

Sincerely,

  
Jack P. Broadbent  
Executive Officer/APCO

cc: Catherine Witherspoon

JPB:bf

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Jack P. Broadbent  
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