

**Comment 1 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Barbara

Last Name: Holman

Email Address: Non-web submitted comment

Affiliation: Coalition for Clean Air

Subject: Form Letter #1

Comment:

Please see attached document. This comment is an example of form letter #1.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/1-perc06-1.pdf>'

Original File Name: perc06-1.pdf

Date and Time Comment Was Submitted: 2006-05-08 13:04:01

250 Duplicates.

**Comment 2 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Hynn

Last Name: Lee

Email Address: Non-web submitted comment

Affiliation: Leo, Inc.

Subject: Comment for Amendments to Dry Cleaning ATCM

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/2-perc06-2.pdf>'

Original File Name: perc06-2.pdf

Date and Time Comment Was Submitted: 2006-05-10 10:06:49

No Duplicates.

## **Comment 3 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Luis

Last Name: Cabrales

Email Address: luis@coalitionforcleanair.org

Affiliation:

Subject: Dry Cleaning ATCM

Comment:

May 10, 2006

Mr. Bob Fletcher  
California Air Resources Board  
1101 I Street  
Sacramento, CA 95814

Re: Dry Cleaning ATCM

Dear Mr. Fletcher:

We are writing to express our strong opposition to the Air Resources Board (ARB) staff's proposed amendments to the Airborne Toxic Control Measure for Perchloroethylene Dry Cleaning (Dry Cleaning ATCM). There is ample scientific data showing that perchloroethylene ("perc") is very harmful to human health, and dry cleaners using this chemical pose an unacceptable health risk to their employees, their customers, and their neighborhoods. And yet, the ARB proposed ATCM will not protect Californians from this toxic chemical. Given that ARB acknowledges that there are cost-effective non-toxic, non-smog forming alternatives, we urge the board to replace the current proposal with an expeditious phase-out of perc dry cleaning. Additionally, to ensure that ARB does not unintentionally create a shift to Volatile Organic Compounds-containing (VOC) systems, ARB should phase out new hydrocarbon dry cleaners.

Perchloroethylene is known to the State of California to cause cancer. The non-cancer health effects include headaches, dizziness, nausea, vomiting, fainting, fluid build up in the lungs, and damage to the central nervous system, kidneys, liver, and reproductive system. In addition, perc is estimated to have contaminated one in ten public drinking wells in California.

Given the very harmful impacts of this toxic chemical, we have many serious concerns with ARB's proposed amendments to the Dry Cleaning ATCM including:

1. The ARB proposal prohibits new perc machines and phases-out existing perc machines only in co-residential facilities. This approach should be the requirement for all perc dry cleaners in California. However, the proposal would allow the continued use of perc indefinitely in non-co-residential facilities. This simply doesn't make sense.
  - a. The risk to neighbors, consumers and workers is not limited to

co-residential facilities.

b. The South Coast Air Quality Management District adopted a phase-out approach in 2002.

c. There are non-toxic and non-smog forming alternatives available and being used successfully in California.

2. A cleaner which installs the suite of pollution control technologies called for in this proposal will still expose their workers, their customers, and their neighbors to unacceptable health risks from perc. No control technology available reduces the risk from perchloroethylene dry cleaning machines to acceptable levels.

3. The proposal unfairly sets up perc dry cleaners for future regulation and expense because it does not adequately reduce health risks and these risks will have to be addressed.

4. The proposal relies heavily on complicated pollution control technologies even though serious issues have been identified regarding compliance, training and maintenance to ensure these controls work as designed.

5. Compliance has been a longstanding challenge for regulators trying to reduce pollution from dry cleaners. This proposal does nothing to address the fact that neither ARB nor the Air Districts have sufficient resources to adequately monitor compliance with current regulatory requirements or additional requirements.

6. Relative to the siting of new facilities, the proposal calls for a 300-foot buffer zone between new perc dry cleaners and the boundary of any area that is zoned for residential use, or which contains a sensitive receptor. The proposal does NOT require buffer zones for new dry cleaners in commercial zones even though the ARB analysis shows very little difference in health risks between neighboring residences and commercial businesses.

7. Though ARB staff has identified current and future industry shifts to VOC alternatives as a major concern, the proposal does nothing to address this problem. Instead, ARB is further encouraging the shift to hydrocarbon alternatives. This creates unfair burdens on owners because additional regulations will be required of them in order to address increases in smog-forming emissions resulting from their operations. ARB should have a proactive approach that phases out smog-forming alternatives and encourages the use of non-toxic, non-polluting technologies.

One other major concern we have is that ARB staff seems to be using questions about the effectiveness of alternatives to perc as a justification for an ATCM proposal which accommodates continued perc use. It is really frustrating that ARB staff has questions about the effectiveness of alternatives given their very limited implementation of the AB 998 program which is aimed at demonstrating the known viability of alternatives and at encouraging the use of non-toxic, non-smog forming alternatives.

The legislation, which was signed into law in 2002 and took effect in January 2003, directed ARB to apply a fee on the perc used in dry cleaning, use some of the funds collected to establish a demonstration program of non-toxic, non-smog forming alternatives, and use the additional funds for grants to cleaners which are making the transition to these safer alternatives.

Our understanding is that more than two years after this law took effect ARB: 1) may not be fully collecting fees on the perc used by California dry cleaners, 2) has not implemented a single demonstration and, 3) has only made 14 grants in a state with almost 5,000 dry cleaners. We believe this lack of progress has led ARB staff to propose a less health protective Dry Cleaning ATCM. To protect public health from toxic chemicals ARB must do more to prevent pollution and encourage the use of non-toxic alternatives.

We remain committed to working with you to phase out the use of perc in dry cleaning and encourage the use of non-toxic, non-smog forming alternatives to protect the health of all Californians.

Sincerely,

Tim Carmichael  
Coalition for Clean Air

Carmen Hayes  
AFSCME Local 3090

Bonnie Holmes-Gen  
American Lung Association of California

Raul Macias  
Anahuak Youth Sport Association

Tom Frantz  
Association of Irritated Residents

Jeanne Rizzo, R.N.  
Breast Cancer Fund

Jane Williams  
California Communities Against Toxics

Susan Smartt  
California League of Conservation Voters

Robina Suwol  
California Safe Schools

Jose Carmona  
Center for Energy Efficiency  
and Renewable Technologies

Cynthia Babich  
Del Amo Action Committee

Teresa De Anda  
El Comite Para el Bienestar de Earlimart

Jim Stewart, PhD  
Earth Day Los Angeles

Mary Luevano  
Global Green USA

Neil Gendel

Healthy Children Organizing Project  
Felipe Aguirre  
Inquilinos Unidos Pro-Justicia Ambiental

Marlom Portillo  
Instituto De Educación Popular Del Sur De California ( IDEPSCA)

Lorena Domínguez  
Lideres Campesinas

Sherlina Nageer, MPH  
Literacy for Environmental Justice

Felipe Aguirre  
Mayor Pro Tem  
Maywood, CA.

Julie Masters  
Natural Resources Defense Council

Hector Alvarado  
Padres Unidos de Maywood (PUMA)

Gary A. Patton, Executive Director  
Planning and Conservation League

David Lighthall, Ph.D.  
Relational Culture Institute

Bill Magavern  
Sierra Club

Suzan Luu  
Southern California Coalition for Occupational Safety & Health  
SoCalCOSH

Conner Everts  
Southern California Watershed Alliance

Susan Frank  
Steven and Michele Kirsch Foundation

Alejandra Domenzain  
Sweatshop Watch

Frances C. Schreiberg  
WorkSafe

Cc: Senator Alan Lowenthal  
Assembly Member Sally Lieber  
Catherine Witherspoon  
Dan Donohue

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-05-10 16:46:48

No Duplicates.

**Comment 4 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Katy

Last Name: Wolf

Email Address: Non-web submitted comment

Affiliation: Institute for Research & Technical Asst.

Subject: Comment for Amendments to Dry Cleaning ATCM

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/4-perc06-4.pdf>'

Original File Name: perc06-4.pdf

Date and Time Comment Was Submitted: 2006-05-12 11:46:07

No Duplicates.

**Comment 5 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Pierre

Last Name: Cinar

Email Address: psalsa@aol.com

Affiliation:

Subject: PERC

Comment:

Insted of banning the perc. It could be more researches for better machines for perc and better regulations. Every three or four years new regulations new expenses. Replacement machines costing over \$50000 to \$80000. I think it can only one strick regulations and stick with it then we don't need to replace new machine every four years.

Thank You For Your Time

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-05-17 12:31:24

No Duplicates.

**Comment 6 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Stephen  
Last Name: Risotto  
Email Address: [srisotto@hsia.org](mailto:srisotto@hsia.org)  
Affiliation: Halogenated Solvents Industry Alliance

Subject: HSIA comments on dry cleaning proposal

Comment:

Attached are HSIA's comments on the proposed amendments to the perchloroethylene dry cleaning ATCM.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/6-hsia\\_comment\\_on\\_drycleaning\\_atcm.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/6-hsia_comment_on_drycleaning_atcm.zip)'

Original File Name: hsia comment on drycleaning atcm.zip

Date and Time Comment Was Submitted: 2006-05-17 20:37:34

No Duplicates.

**Comment 7 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) -  
45 Day.**

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

Subject: PROPOSED AMENDMENTS TO THE AIRBORNE TOXIC CONTROL MEASURE  
FOR EMISSIONS OF PERCHLOROETHYLENE

Comment:

Comments of the International Fabricare Institute--Attached

IFI appreciates the opportunity to provide written comments to the proposed perchloroethylene dry cleaner regulation.

If you have any questions, please do not hesitate to contact me at 800-638-2627 extension 1301.

Sincerely,

Jon Meijer  
VP Membership IFI

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/7-carb\\_comments\\_may\\_2006.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/7-carb_comments_may_2006.doc)'

Original File Name: CARB Comments May 2006.doc

Date and Time Comment Was Submitted: 2006-05-19 06:59:51

No Duplicates.

## **Comment 8 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Tom

Last Name: Frantz

Email Address: ini@lightspeed.net

Affiliation:

Subject: Perc and dry cleaners next to schools

Comment:

Please phase out perc totally from all dry cleaners over as many years as you feel necessary. Also, please do not allow a substitute which will increase VOCs in the San Joaquin Valley. I am enclosing a picture of my home town, Wasco, CA where the dry cleaner is right next door to the playground of the local elemenatary school. This business will be allowed to continue using perc under your proposed amendment. How many other situations like this exist in the state? Please protect our children and our air quality by doing the right thing.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/8-dry\\_cleaner\\_next\\_to\\_school\\_in\\_wasco.jpg](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/8-dry_cleaner_next_to_school_in_wasco.jpg)'

Original File Name: dry cleaner next to school in Wasco.JPG

Date and Time Comment Was Submitted: 2006-05-21 12:55:30

No Duplicates.

**Comment 9 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) -  
45 Day.**

First Name: Sandra  
Last Name: Giarde  
Email Address: [sandra@camgmt.com](mailto:sandra@camgmt.com)  
Affiliation: California Cleaners Association

Subject: Comments of the California Cleaners Association --Attached

Comment:

CCA appreciates the opportunity to provide written comments to the proposed changes to the Air Toxics Control Measure concerning perchloroethylene dry cleaners.

If you have any questions, please do not hesitate to contact me at (916) 239-4070.

Sincerely,

Sandra Giarde  
Executive Director  
California Cleaners Association  
2520 Venture Oaks Way, Suite 150  
Sacramento, CA 95833  
(916) 239-4070 - phone  
(916) 924-7323 - fax  
[www.calcleaners.com](http://www.calcleaners.com) - website

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/9-cca\\_atcm\\_comment\\_letter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/9-cca_atcm_comment_letter.pdf)'

Original File Name: CCA ATCM Comment Letter.pdf

Date and Time Comment Was Submitted: 2006-05-22 10:55:30

No Duplicates.

**Comment 10 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Barbara

Last Name: Lee

Email Address: Non-web submitted comment

Affiliation: CAPCOA

Subject: Proposed Amendments to the Airborne Toxic Control Measure (ATCM)...

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/10-perc06-10.pdf>'

Original File Name: perc06-10.pdf

Date and Time Comment Was Submitted: 2006-05-23 09:03:37

No Duplicates.

**Comment 11 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Mun

Last Name: Kim

Email Address: kdla@kdla.org

Affiliation: KDLA of Southern California

Subject: KDLA Comments

Comment:

I am attaching this letter on behalf of the member of the Korean Drycleaners-Laundry Association of Southern California(KDLA) to express our general support for the proposed amendments to the ATCM subject to several comments and recommendations which are explained later in this letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/11-perc06-11.doc>'

Original File Name: perc06-11.doc

Date and Time Comment Was Submitted: 2006-05-23 09:34:05

No Duplicates.

**Comment 12 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Peter

Last Name: Sinsheimer

Email Address: psinshei@oxy.edu

Affiliation: Occidental College

Subject: Comments to revision of PERC Dry Cleaning ATCM

Comment:

See attached file for comment letter. Please confirm attached file has been received.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/12-board\\_letter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/12-board_letter.pdf)'

Original File Name: Board Letter.pdf

Date and Time Comment Was Submitted: 2006-05-23 10:14:09

No Duplicates.

**Comment 13 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Jack

Last Name: Broadbent

Email Address: Non-web submitted comment

Affiliation: BAAQMD

Subject: Support of Proposed Modification to the Perchloroethylene Dry Cleaning ATCM

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/13-perc06-13.pdf>'

Original File Name: perc06-13.pdf

Date and Time Comment Was Submitted: 2006-05-23 11:59:29

No Duplicates.

**Comment 14 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Janine

Last Name: Hammer

Email Address: Non-web submitted comment

Affiliation:

Subject: Form Letter #2

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/14-perc06-14.pdf>'

Original File Name: perc06-14.pdf

Date and Time Comment Was Submitted: 2006-05-23 12:33:36

100 Duplicates.

**Comment 15 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Susan

Last Name: Nakamura

Email Address: snakamura@aqmd.gov

Affiliation: SCAQMD

Subject: Comment Letter on Dry Cleaning ATCM

Comment:

Signed letter was faxed to Clerk of the Board at (916) 322-3928.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/15-perc\\_comment\\_letter\\_to\\_carb\\_rev\\_5\\_23\\_06.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/15-perc_comment_letter_to_carb_rev_5_23_06.pdf)'

Original File Name: Perc Comment letter to CARB rev 5\_23\_06.pdf

Date and Time Comment Was Submitted: 2006-05-23 14:43:31

No Duplicates.

**Comment 16 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Sushma

Last Name: Dhulipala

Email Address: sushma.dhulipala@sfgov.org

Affiliation: SF Department of the Environment

Subject: Comments on Proposed Dry Cleaning ATCM

Comment:

Comments on the proposed dry cleaning rule amendment attached.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/16-rule\\_amendment\\_-\\_comment\\_letter\\_052306.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/16-rule_amendment_-_comment_letter_052306.pdf)'

Original File Name: Rule Amendment - Comment Letter 052306.pdf

Date and Time Comment Was Submitted: 2006-05-23 15:11:19

No Duplicates.

## **Comment 17 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Lynnette  
Last Name: Watterson  
Email Address: h2osons@aol.com  
Affiliation: California Cleaners Association

Subject: ATCM Porposal Comments

Comment:

May 23, 2006

Dear Air Resources Board Members,

My name is Lynnette Watterson. I am the current President of the California Cleaners Association and I am the owner of a perc dry cleaning establishment, Crystal Cleaning Center, in San Mateo started by my mother, Violet Janks, in 1963. We currently have eight employees, and our total years of service is 86 years. My mother passed away last year at the age of 87 and one of our former employees, who worked for us for 36 years and is now retired, recently turned 84. Several of our employees have had children while in our employ, who are all healthy and thriving.

Over the last many months, I have participated in several work groups of the ARB by phone or in person. I regularly participate in the work group meetings of the Bay Area Air Quality Management District. Additionally, I attended the Rule 1421 hearings at South Coast.

I wish to commend the thoroughness of the ARB work group as they painstakingly reviewed the volumes of information regarding the ATCM Proposal. Their recommendations appear to be rational. They have reviewed the issues from a very well-rounded perspective, including the fiscal impact of potential changes to the regulations for our industry. In an industry that is predominantly comprised of small "mom 'n pop" businesses, the fiscal impact of a mandated ban on perc would be devastating. I applaud their decision not to call for an outright ban on perc. The dry cleaning industry has dramatically reduced perc consumption. This reduction, coupled with new equipment technologies, make continued use of perc a viable option.

While alternative solvents are being explored, their efficacy, long-range effect on our population and/ or our environment are yet to be determined. The ARB workgroup's assessment of the "alternatives" was well thought out. While wet-cleaning is a natural adjunct to a dry cleaning operation, it cannot be construed as a total replacement for dry cleaning. Crucial is the compliance of operators with rules governing business operations, regardless of which solvent/method is being used.

I appreciate the opportunity to come before this body to express by endorsement of the recommended changes to the ATCM, and wish to state that I am proud to be part of an industry that "Keeps America Beautiful!"

Sincerely,

Lynnette Watterson, Owner  
Crystal Cleaning Center  
San Mateo, CA  
President, California Cleaners Association

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-05-23 23:38:47

No Duplicates.

**Comment 18 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Catherine

Last Name: Porter

Email Address: cporter@worksafe-cosh.org

Affiliation: Worksafe

Subject: Amendments to control measure for perchloroethylene...

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/18-perc06-18.pdf>'

Original File Name: perc06-18.pdf

Date and Time Comment Was Submitted: 2006-05-24 10:01:33

No Duplicates.

**Comment 19 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Jessica

Last Name: Goodheart

Email Address: Non-web submitted comment

Affiliation: Los Angeles Alliance for a New Economy

Subject: Dry Cleaning ATCM

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/19-perc06-19.pdf>'

Original File Name: perc06-19.pdf

Date and Time Comment Was Submitted: 2006-05-24 10:10:19

No Duplicates.

**Comment 20 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Elinor

Last Name: Taylor

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment for Dry Cleaning ATCM

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/20-perc06-20.pdf>'

Original File Name: perc06-20.pdf

Date and Time Comment Was Submitted: 2006-05-24 10:13:20

No Duplicates.

## **Comment 21 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: James

Last Name: Roybal

Email Address: lcabral@verizon.net

Affiliation: Residents of Pico Rivera for EJ

Subject: Proposed amendments to the ATCM

Comment:

Residents of Pico Rivera for Environmental Justice  
3658 Gangel Ave. Pico Rivera, CA 90660  
(213) 427-5973

May 24, 2006

Mr. Bob Fletcher  
Division chief  
California Air Resources Board-Stationary Source Division  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812

Dear Mr. Fletcher,

I am writing to express my concern over the Air Resources Board (ARB) staff's proposed amendments to the Airborne Toxic Control Measure (ATCM) for perchloroethylene in dry cleaning. The scientific data shows that perchloroethylene ("perc") is very harmful to human health, and dry cleaners using this chemical pose an unacceptable health risk to their employees, their customers and our neighborhoods. The control measure that the ARB has proposed is not enough to protect Californians from this toxic chemical.

It has been our experience that local communities cannot always rely on their local governments or regional agencies for protection from toxics, unless toxics are phased out. In the past, our local government, which lacks knowledge of the threats some small business present to the community, has failed to stay in contact with our regional regulatory agencies for this type of information. At least the SCAQMD has made the right move to phase out this toxic. However, most communities throughout the state are still waiting for a similar action.

I urge you to replace the current proposal with an expeditious phase-out of perc in dry cleaning.

Perchloroethylene is known to the state of California to cause cancer. Also, the non-cancer health effects include headaches, dizziness, nausea, vomiting, fainting, fluid buildup in the lungs, and damage to the central nervous system, kidneys, liver and reproductive system.

ARB estimates that about 3 million pounds of perc are released

into California's air each year by the dry cleaning industry alone. Based on EPA data, perc is one of the top 10 most toxic air contaminants in California.

I am in favor of alternatives to the use of the toxic chemical perc, such as wet cleaning. Professional wet cleaning uses only water and non-toxic biodegradable detergents that are environmentally friendly, less costly and may even save energy. Wet cleaning is effective in washing delicate garments but does not melt buttons or ornamentation on garments.

Furthermore, AB 998, legislation that took effect in January 2003, directed ARB to apply a fee on the perc used in dry cleaning, use some of the funds collected to establish a demonstration program of non-toxic, non-smog forming alternatives, and use the additional funds for grants to cleaners which are making the transition to these safer alternatives.

Unfortunately, more than two years after this law took effect, ARB has not made sufficient progress to implement the program. Coupled with the weak Dry Cleaning ATCM, this raises serious questions about ARB's commitment to pollution prevention and to the protection of public health from toxic chemicals.

Local communities cannot rely on their local governments and/or agencies alone. We will not be able to protect workers, customers and our communities, unless your agency acts immediately to phase out perc in dry cleaning. Please phase out perc in dry cleaning.

Thank you for your consideration.

Sincerely,

James Roybal  
President

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-05-24 10:58:30

No Duplicates.

**Comment 22 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Steve  
Last Name: Moore  
Email Address: steve.moore@sdcounty.ca.gov  
Affiliation: SDCAPCD

Subject: Comments on Proposed ATCM

Comment:

Attached are San Diego County Air Pollution Control District's comments on the proposed dry cleaning ATCM.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/22-sdcapcd\\_comments\\_dry\\_cleaning\\_on\\_board\\_submittal\\_rev4.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/22-sdcapcd_comments_dry_cleaning_on_board_submittal_rev4.doc)'

Original File Name: SDCAPCD Comments Dry Cleaning on Board Submittal Rev4.doc

Date and Time Comment Was Submitted: 2006-05-24 11:24:59

No Duplicates.

**Comment 23 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

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

Subject: Proposed Amendments to the Dry Cleaning ATCM  
Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/23-perc06-23.pdf>'

Original File Name: perc06-23.pdf

Date and Time Comment Was Submitted: 2006-05-24 11:45:37

No Duplicates.

**Comment 24 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

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

Subject: Proposed Amendments to the Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/24-perc06-24.pdf>'

Original File Name: perc06-24.pdf

Date and Time Comment Was Submitted: 2006-05-24 11:51:55

No Duplicates.

**Comment 25 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Heather  
Last Name: Lamberson  
Email Address: [hlamberson@lacsd.org](mailto:hlamberson@lacsd.org)  
Affiliation: LA County Sanitation Districts

Subject: Comments on Proposed Dry Cleaning ATCM

Comment:

Please see attached comments from the Los Angeles County Sanitation Districts on the California Air Resources Board Proposed Amendments to the Airborne Toxic Control Measure for Emissions of Perchloroethylene from Dry Cleaning Operations.

Please let me know if you have any questions.

Thank you,

Heather Lamberson  
Project Engineer  
Industrial Waste Section  
Los Angeles County Sanitation Districts

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/25-ARB\\_ATCM\\_for\\_PERC\\_LACSD\\_Comments\\_052406.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/25-ARB_ATCM_for_PERC_LACSD_Comments_052406.pdf)'

Original File Name: ARB ATCM for PERC\_LACSD Comments 052406.pdf

Date and Time Comment Was Submitted: 2006-05-24 11:52:34

No Duplicates.

**Comment 26 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Adrian

Last Name: Martinez

Email Address: Non-web submitted comment

Affiliation: NRDC

Subject: Perchloroethylene Airborne Toxic Control Measure

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/26-perc06-26.pdf>'

Original File Name: perc06-26.pdf

Date and Time Comment Was Submitted: 2006-05-24 11:56:20

No Duplicates.

**Comment 27 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: David

Last Name: Cotter

Email Address: [david@tcata.org](mailto:david@tcata.org)

Affiliation: Textile Care Allied Trades Assn.

Subject: perc issues

Comment:

please see attached comments

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/27-carb\\_comments\\_tcata.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/27-carb_comments_tcata.doc)'

Original File Name: CARB comments tcata.doc

Date and Time Comment Was Submitted: 2006-05-24 11:58:48

No Duplicates.

**Comment 28 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Frank

Last Name: Choy

Email Address: ncaiclean@aol.com

Affiliation: National Cleaners Association (NCA)

Subject: Drycleaning Airborne Toxics Control Measure (ACTM)

Comment:

We are pleased to present our comments on the proposed rule governing perchloroethylene drycleaners.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/28-carb.doc>'

Original File Name: carb.doc

Date and Time Comment Was Submitted: 2006-05-24 12:05:10

No Duplicates.

**Comment 29 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: California State

Last Name: Legislature

Email Address: Non-web submitted comment

Affiliation:

Subject: Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/30-perc06-29.pdf>'

Original File Name: perc06-29.pdf

Date and Time Comment Was Submitted: 2006-05-24 12:14:00

No Duplicates.

**Comment 30 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Vivian

Last Name: Bowers

Email Address: Non-web submitted comment

Affiliation: Bowers & Sons Cleaners

Subject: Perc Regs

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/31-perc06-30.pdf>'

Original File Name: perc06-30.pdf

Date and Time Comment Was Submitted: 2006-05-24 12:19:59

No Duplicates.

**Comment 31 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Timothy

Last Name: Malloy

Email Address: Malloy@law.ucla.edu

Affiliation: UCLA School of Law

Subject: Comments on Proposed Dry Cleaning ATCM Revisions

Comment:

Attached please find comments submitted by Timothy F. Malloy on the Proposed ATCM for dry cleaning.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/32-amend\\_atcm\\_perch\\_dry\\_clng\\_op\\_scn.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/32-amend_atcm_perch_dry_clng_op_scn.pdf)'

Original File Name: Amend ATCM Perch Dry Clng Op scn.pdf

Date and Time Comment Was Submitted: 2006-05-24 13:09:39

No Duplicates.

**Comment 32 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Lawrence

Last Name: Lim

Email Address: Non-web submitted comment

Affiliation: Korean Dry Cleaners Assoc. of North. CA

Subject: Comments from the KDANC Dry Cleaning ATCM

Comment:

Please see the attached comment. Original comment in Korean also included.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/33-perc06-31.pdf>'

Original File Name: perc06-31.pdf

Date and Time Comment Was Submitted: 2006-05-24 14:56:24

No Duplicates.

**Comment 33 for Perchloroethylene Dry Cleaning Operations 2006 (perc06) - 45 Day.**

First Name: Jeff

Last Name: Scott

Email Address: Non-web submitted comment

Affiliation: U.S. EPA, Region 9

Subject: Comments on Rulemaking to Consider Amendments to the Control Measure for Pero...

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/35-perc06-33.pdf>'

Original File Name: perc06-33.pdf

Date and Time Comment Was Submitted: 2006-05-24 15:01:48

No Duplicates.

**Comment 1 for Perchloroethylene Dry Cleaning Operations 2006 (perc06).  
(At Hearing)**

First Name: Jill

Last Name: Whynot

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Comments for Amendments to the Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/36-perc06-ws-1.pdf>

Original File Name: perc06-ws-1.pdf

Date and Time Comment Was Submitted: 2006-05-26 12:10:09

No Duplicates.

**Comment 2 for Perchloroethylene Dry Cleaning Operations 2006 (perc06).  
(At Hearing)**

First Name: David

Last Name: Dawson

Email Address: Non-web submitted comment

Affiliation: Textile Care Allied Trades Assoc.

Subject: Comments for Amendments to the Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/37-perc06-ws-2.pdf>

Original File Name: perc06-ws-2.pdf

Date and Time Comment Was Submitted: 2006-05-26 12:32:04

No Duplicates.

**Comment 3 for Perchloroethylene Dry Cleaning Operations 2006 (perc06).  
(At Hearing)**

First Name: Elaine

Last Name: Chang

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Comments for Amendments to the Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/38-perc06-ws-3.pdf>

Original File Name: perc06-ws-3.pdf

Date and Time Comment Was Submitted: 2006-05-26 12:34:47

No Duplicates.

**Comment 4 for Perchloroethylene Dry Cleaning Operations 2006 (perc06).  
(At Hearing)**

First Name: Peter

Last Name: Sinsheimer

Email Address: Non-web submitted comment

Affiliation: Occidental College

Subject: Comments for Amendments to the Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/39-perc06-ws-4.pdf>

Original File Name: perc06-ws-4.pdf

Date and Time Comment Was Submitted: 2006-05-26 12:42:42

No Duplicates.

**Comment 5 for Perchloroethylene Dry Cleaning Operations 2006 (perc06).  
(At Hearing)**

First Name: Rudie

Last Name: Smit

Email Address: rsmit@mieleusa.com

Affiliation: Miele Professional

Subject: Comments for Amendments to the Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/40-perc06-ws-5.pdf>

Original File Name: perc06-ws-5.pdf

Date and Time Comment Was Submitted: 2006-05-26 12:44:34

No Duplicates.

**Comment 6 for Perchloroethylene Dry Cleaning Operations 2006 (perc06).  
(At Hearing)**

First Name: Luis

Last Name: Cabrales

Email Address: Non-web submitted comment

Affiliation: Residents of Pico Rivera for EJ

Subject: Comments for Amendments to the Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/41-perc06-ws-6.zip>

Original File Name: perc06-ws-6.zip

Date and Time Comment Was Submitted: 2006-05-26 13:00:21

No Duplicates.

**Comment 7 for Perchloroethylene Dry Cleaning Operations 2006 (perc06).  
(At Hearing)**

First Name: Bobby

Last Name: Smerling

Email Address: Non-web submitted comment

Affiliation: Brentwood Royal Cleaners

Subject: Comments for Amendments to the Dry Cleaning ATCM

Comment:

Please see that attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/42-perc06-ws-7.pdf>

Original File Name: perc06-ws-7.pdf

Date and Time Comment Was Submitted: 2006-05-26 13:04:34

No Duplicates.

**Comment 8 for Perchloroethylene Dry Cleaning Operations 2006 (perc06).  
(At Hearing)**

First Name: Kwon

Last Name: Taekook

Email Address: Non-web submitted comment

Affiliation: Fashion Cleaners

Subject: Amendments to the Dry Cleaning ATCM

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/perc06/43-perc06-ws-8.pdf>

Original File Name: perc06-ws-8.pdf

Date and Time Comment Was Submitted: 2007-01-04 10:56:47

No Duplicates.