



San Francisco City and County
Department of Public Health
Environmental Health Section
Occupational & Environmental Health

Gavin Newsom, Mayor
Mitchell H. Katz, Director of Health
Rajiv Bhatia, M.D., M.P.H.
Director of Environmental Health

November 6, 2006

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

Virginia St. Juan

06-10-8
November 16, 2006

BY REGULAR MAIL AND FAX

Re: Support of Consumer Products Proposal for the Reduction of VOC limits for automotive aerosol cleaning products to 10% VOC.

Dear Air Resources Board:

Please accept this comment letter from The San Francisco Department of Public Health (SFDPH), Occupational and Environmental Health Section in support of lowering VOC limits for automotive aerosol cleaning products. SFDPH has pioneered the local effort to integrate regulatory compliance with sustainable practices. The result is two sustainable business awards programs- the Department of Public Health Clean and Green Program and the San Francisco Green Business Program. Both programs work with San Francisco businesses to ensure environmental compliance and educate businesses on toxics reduction, pollution prevention and resource conservation. The Hazardous Materials Unified Program Agency is the Environmental Regulatory Branch of the SFDPH and is responsible for over 2,400 San Francisco businesses including auto repair shops, manufacturers, printers, gas stations, hotels and hospitals using hazardous materials and/or generating hazardous waste.

SFDPH strongly urges the California Air Resources Board to adopt legislation to reduce the volatile organic compound (VOC) limits for automotive aerosol cleaning products in the Consumer Products Regulation to 10% VOC for the categories of brake cleaning, general purpose cleaning, engine degreasing and carburetor and fuel injection system cleaning. In the San Francisco Bay Area, the BAAQMD has disallowed stationary solvent parts washers exceeding 50 g/liter VOCs. As a result, auto repair shops have significantly reduced VOCs during parts washing with the exception of aerosolized solvents, which are still allowed up to 45% VOC. During the course of our day to day compliance inspections, we have noticed a resistance to reduce the amount of aerosol product usage and we are concerned with the health hazards of the ingredients currently in these products. We feel regulatory action is required to achieve a necessary emissions reduction in VOCs and this reduction would benefit human health and the environment.

The principal human health and environmental benefits from a reduction to 10% VOC will occur due to reductions in ground level concentrations of ozone outdoors and levels of VOC exposure indoors. The solvents of most concern include, but are not limited to toluene, xylenes, n-hexane, ethyl benzene, benzene and various other petroleum hydrocarbons, all of which are neurotoxins and most of which are Proposition 65 listed chemicals and cause chronic health effects or are classified as Toxic Air Contaminants. At high concentrations, VOCs have noticeably toxic effects, some which vary by composition, but which include neurological effects in all cases. Chronic exposure to VOCs can be linked to cancer, liver and kidney damage. Direct toxicity from

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VOCs is primarily an indoor air pollution and occupational hazard. Reductions in VOCs in cleaners will help reduce the excess exposure of workers, thereby reducing acute and chronic health problems for the workers exposed.

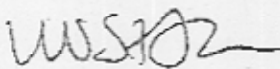
The health impacts of these high VOC solvents affect not only the workers indoors, but also the neighboring communities. In such an urbanized setting such as San Francisco, it is common to have businesses adjacent to residences, thus potentially impacting the air quality of the entire neighborhood. Community health impacts are of particular concern in environmental justice neighborhoods where we see many service oriented businesses such as auto repair shops. In low levels, the health effects of VOC include dizziness, respiratory irritations and nausea. Persons with respiratory problems such as asthma, young children, elderly, and persons with heightened sensitivity to chemicals may be more susceptible to illness from VOC exposure. In San Francisco, high rates of asthma tend to geographically coincide with the location of industrial and light industrial businesses. By lowering limits of VOCs in aerosols, exposure concentrations that lead to negative health outcomes could be averted along with the associated medical cost to our public health care system.

There are simple and inexpensive technologies could significantly reduce the excess exposure of workers and at risk communities to the health impacts of VOCs. Alternative low VOC cleaners have proven to be effective substitutes for their high VOC counterparts, although they are not yet readily available in the San Francisco area in an aerosol form. Water-based, soy-based and acetone-based aerosol cleaners have been studied in Southern California and have been shown to be effective cleaners. The regulation requiring the reduction of VOCs will also introduce innovations in creating safer products for workers and communities.

We urge the Board to pass this legislation to reduce VOCs in aerosols to 10% as soon as possible. Just 3 years ago, aqueous stationary parts washers were deemed cutting edge in the San Francisco Bay Area. They are now readily accepted by the auto repair industry as safer, less polluting and effective. If VOC limits were lowered to 10% with effective alternative products available, this industry and neighboring communities would greatly benefit from reduced exposure to these unnecessary solvents. Without this legislation we are seeing little change in the constituents of aerosols. If manufacturers were required to reformulate their products to meet CARB VOC limits, safer alternatives would be more available for businesses. In Southern California these solvents have been proven effective, we would like to see this transition in Northern California as soon as possible.

If you would like to discuss this further, please contact me at (415) 252-3907.

Sincerely,



Virginia St. Jean, CIH
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