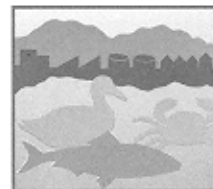


Regional Water Quality Control Plant

Operated by the City of Palo Alto

for the East Palo Alto Sanitary District,
Los Altos, Los Altos Hills, Mountain View,
Palo Alto, and Stanford



November 14, 2006

Mr. Bob Sawyer, Executive Officer
California Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814



Attn: Clerk of the Board

Dear Mr. Sawyer:

*L. Anderson
B. Sawyer
CEW*

Comments on the November 2006 Proposed Amendments to the California Consumer Products Regulations

The Palo Alto Regional Water Quality Control Plant appreciates the opportunity to comment on the November 2006 Proposed Amendments to the California Consumer Products Regulations (Proposed Amendments). We support the efforts of the California Air Resources Board (CARB) to more stringently regulate perchloroethylene, methylene chloride and trichloroethylene in consumer products. Specifically, we strongly support CARB's proposed action prohibiting of the use of perchloroethylene, methylene chloride and trichloroethylene in Construction, Panel, and Floor Covering Adhesives, Oven Cleaners, General Purpose Cleaners, and Bathroom and Tile Cleaners (Section 94509(p) of the Proposed Amendments). The proposed prohibition of perchloroethylene, methylene chloride and trichloroethylene is necessary to mitigate potential adverse impacts that would result from implementing the volatile organic compound (VOC) limits for these categories (i.e., to prevent possible reformulation using these compounds), and to ensure a level playing field among all products. Such a prohibition would be expected to reduce discharges of these toxic compounds to sewer systems, and would not be expected to result in any adverse cross-media impacts to water.

We are quite concerned that if the use of these compounds in consumer products increased, we could see increases at our sewage treatment plant. Volatilization at the Plant could then result in increased air emissions and a negative impact on our AB 2588 Health Risk Assessment.

We urge CARB to take all actions necessary to minimize the discharge of perchloroethylene, methylene chloride and trichloroethylene to the sewer system. We appreciate the opportunity to provide these comments. If you have any questions regarding this letter, please do not hesitate to contact me at (650) 329-2285.

Very truly yours,

Phil Bobel
Manager, Environmental Compliance Division

PB:maa