



# ORANGE COUNTY SANITATION DISTRICT

November 15, 2006

*L. Andreoni*  
*R. Sawyer*



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

Attention: Clerk of the Board

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

Dear Mr. Sawyer:

The Orange County Sanitation District (OCSD) appreciates the opportunity to comment on the November 2006 Proposed Amendments to the California Consumer Products Regulations (Proposed Amendments). OCSD supports the efforts of the California Air Resources Board (CARB) to more stringently regulate perchloroethylene, methylene chloride, and trichloroethylene in consumer products. Specifically, OCSD strongly supports CARB's proposed action prohibiting 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). OCSD agrees with CARB staff that the proposed prohibition of these three chemicals 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 public sewer systems, and would not be expected to result in any adverse cross-media impacts to air, land, or water.

OCSD provides sewerage services to over 2 million residents and numerous commercial businesses within Orange County. OCSD operates two wastewater treatment plants treating over 240 millions gallons per day of wastewater, and provides superior quality effluent suitable for reuse. By the year 2007, over 85 million gallons per day of recycled water will be produced by OCSD, with over 70 million gallons per day used for various applications including groundwater replenishment uses.

OCSD has been aggressively pursuing the reduction of discharges of these toxic compounds to the sewerage system for several years. These source reduction efforts have included a prohibition on the discharge of perchloroethylene-containing wastewater from dry cleaners; imposition of perchloroethylene discharge limits on industrial users; and support of South Coast Air Quality Management District's (SCAQMD) and CARB's efforts to phase-out the use of perchloroethylene, methylene chloride, and trichloroethylene in cleaning operations and products, such as dry cleaning, automotive products, and other categories of consumer products (e.g., contact adhesives, electrical

#### Member Agencies

#### Cities

Anaheim  
Brea  
Buena Park  
Cypress  
Fountain Valley  
Fullerton  
Garden Grove  
Huntington Beach  
Irvine  
La Habra  
La Palma  
Los Alamitos  
Newport Beach  
Orange  
Placentia  
Santa Ana  
Seal Beach  
Stanton  
Tustin  
Villa Park  
Yorba Linda

#### County of Orange

#### Sanitary Districts

Costa Mesa  
Midway City

#### Water Districts

Irvine Ranch



California Air Resources Board  
November 15, 2006  
Page 2 of 2

cleaners, footwear/leather care products, general purpose degreasers, adhesive removers, electrical cleaners, and graffiti removers).

In addition, OCSD requests that the section of the Proposed Amendments regarding Special Reporting Requirements for Consumer Products that Contain Perchloroethylene or Methylene Chloride (Section 94513(e) of the Proposed Amendments) be updated so that reporting requirements are the same for both of these compounds. Specifically, Section 94513(e)(4) should be modified to include reporting requirements for methylene chloride, as well as perchloroethylene. This information would assist publicly-owned treatment works that have experienced increased levels of these compounds in determining if the levels can be attributed to consumer products containing perchloroethylene, or methylene chloride.

OCSD urges CARB to take all actions necessary to minimize the discharge of perchloroethylene, methylene chloride and trichloroethylene to the sewer system. OCSD appreciates the opportunity to provide these comments. If you have any questions regarding this letter, please contact the undersigned or James Wybenga at (714) 593-7410 or (714) 593-7430, respectively.

Mahin Talebi  
Source Control Manager

MT:JW:lvw

H:\dept\ts\640\ivorwin\cl\ARB Products Reg\_Nov 2006 Comments.doc

c: Paul Martyn, LACSD