



**SF Environment**

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Mayor

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May 23, 2006

Dr. Robert Sawyer  
Board Chair  
California Air Resources Board  
1101 I Street  
Sacramento CA 95814

**Re: Proposed Amendments to CARB's Dry Cleaning ATCM**

San Francisco Department of the Environment (SFE) appreciates the opportunity to comment on California Air Resources Board's (CARB's) proposed amendments to the Dry Cleaning Air Toxics Control Measure (Dry Cleaning ATCM). SFE's mission is to improve, enhance, and preserve the environment, and to promote San Francisco's long-term well being.

San Francisco has chosen a proactive approach to the protection of public health and the environment based on the Precautionary Principle, using the best available science to identify cost-effective measures that would minimize harm. We strongly believe that the CARB should use its Air Toxic Control Measures and other regulatory tools to provide the greatest possible protection to human health and the environment.

We have two key comments on the proposed ATCM, detailed below:

**1. Proposed phase-out of perchloroethylene (Perc) as a dry cleaning solvent in facilities located adjacent to residential populations (co-residential facilities.)**

**Recommendation** – Phase out Perc for all existing facilities and ban all new Perc machines.

The proposed amendment to CARB's Dry Cleaning ATCM requires that no co-residential facility shall install any dry cleaning equipment which uses solvents that contain Perc and that existing co-residential facilities shall remove any currently installed Perc dry cleaning machine by July 1, 2010. However, the proposed amendments to the Dry Cleaning ATCM would allow a new source if located 300 feet from a residence. Also, existing sources of Perc can continue to exist adjacent to residential and occupational recipient populations. We are concerned about the environmental justice implications of the proposed ATCM.

The Environmental Justice section of the ISOR states:

*the proposed ATCM is not expected to result in significant negative impacts in any community” (Environmental Impacts of the Proposed Amended ATCM, VII (K), page VIII-10)*

California statute defines environmental justice as:

*the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. (Government Code Section 65040.12 and Public Resources Code Section 72000)*

The City and County of San Francisco is home to 88 perc facilities, which includes 34 co-residential facilities. We are concerned that the differential regulation of existing and new dry cleaning facilities allows differential exposure within California's population. Moreover, existing facilities are generally located in older, poorer neighborhoods, a clear-cut environmental justice issue. ***Hence, we recommend that CARB adopt a ban for all new Perc machines and phase-out Perc for all existing facilities.***

***2. Address new hydrocarbon systems and systems with potential health and environmental hazards***

***Recommendation*** – Aggressively promote non-toxic, non-smog forming cleaning technologies like professional wet cleaning and CO<sub>2</sub> technology.

While we strongly advocate a total phase-out of perc in all new and existing facilities, we are concerned that cleaners will migrate toward hydrocarbon systems or siloxane based (GreenEarth) cleaning methods.

Although CARB staff has identified the industry shift toward hydrocarbon systems as a major concern due to the formation of smog, the proposal does not address this issue. In addition, there are continued concerns about the reproductive toxicity and the potential carcinogenicity of D<sub>5</sub> solvent used in GreenEarth cleaning systems. Since non-toxic, non-smog-forming and cost-effective technologies such as professional wet cleaning and CO<sub>2</sub> cleaning machines are available in the market and are being successfully used in Southern California, we strongly recommend that CARB encourage use of these environmentally friendly cleaning options through more effective implementation of AB 998.

In the City and County of San Francisco, we have taken a precautionary approach by committing resources to support the establishment of professional wet cleaning demonstration sites.

***We recommend that CARB discourage the use of garment cleaning solvents that have potential health impacts and instead consider mandatory approaches or other aggressive promotion options to increase the use of non-toxic and non smog-forming technologies (such as professional wet cleaning and CO<sub>2</sub> dry cleaning).***

Sincerely,



Jared Blumenfeld, Director  
Department of the Environment  
City and County of San Francisco