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Before the California Air Resources Board

Proposed Amendments To The Control Measure For Perchloroethylene Dry Cleaning
Operations

**Comments Of The
Textile Care Allied Trades Association**

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The Textile Care Allied Trades Association represents the leading manufacturers and distributors of drycleaning and laundry supplies and equipment. TCATA's multi-faceted mission includes the goals of education, the generation and exchange of critical business information, and the fostering of a favorable business climate by seeking fair regulation and legislation.

We appreciate the opportunity to comment on the proposed changes to the Airborne Toxic Control Measure for Emissions of Perchloroethylene From Dry Cleaning Operations. We submit our comments in the spirit of exchanging important information and seeking fair regulation.

The manufacturers of drycleaning equipment and others in the textile care industry are justifiably proud of the industry's stellar record for reducing solvent consumption and emissions, a process that began ten years prior to the ATCM and which has continued over a time span that is now longer than 20 years. According to data collected by TCATA through an annual survey of perchlorethylene producers, the volume of perchlorethylene used by the drycleaning industry nationally and in California has declined each year since 1984, and that trend has continued through 2005 without interruption. Today, the industry uses, approximately, just 10% of the perchlorethylene it did during the mid 1980's and all evidence points to that amount becoming ever smaller as time goes on. Today, drycleaners have available to them low-emissions equipment technology, knowledge of safe work practices, an understanding through ongoing training and education of the means to minimize the environmental impact of their activities, professional services to handle their hazardous wastes, and considerable regulatory oversight. Therefore, you might understand why a reasonable person would ask what possible additional benefit could be achieved by making the ATCM regulation more onerous? And ask: Can additional costs and efforts be justified by what can only be a very small incremental benefit?

TCATA is supportive of efforts to enhance work practices, but we are concerned that there is no justification for imposing additional costs and regulatory burden on an industry comprised mostly of very small family businesses that are burdened with complex and expensive regulatory requirements, particularly in light of an admirable performance in achieving the objectives of the original regulation.

TCATA does not agree with arguments that there are meaningful human health benefits yet to be realized. There should be little argument that California risk assessments are overly conservative or that they greatly overstate the actual health risks at typical exposure levels. While such a conservative approach might have been justifiable in the absence of reliable and relevant human health effects study data, new, reliable data from occupational exposure now exists and we believe that an appropriate revision of the risk assessment downward would permit a less onerous approach to managing the risk.

Further, TCATA is concerned that the range of available alternative technologies being promoted as replacements present numerous potential long term problems ranging from unknown or uncertain regulatory fates, concerns over health issues, VOC emissions, commercial practicality, and suitability for serving the best interests of drycleaning consumers. In addition, our experience supports the concern that regulators' guidance regarding alternative technologies is chronically unreliable. During the 1970's California's petroleum solvent drycleaners invested in new perc technology to reduce petroleum solvent VOC emissions. During that same time period US EPA strongly encouraged drycleaners to replace perc technology with Fluorocarbon 113, which was subsequently phased out for its ozone depleting potential, and during the 1980's drycleaners were encouraged to replace perc with 1-1-1 trichloroethane in a misguided attempt to reduce VOC emissions. 1-1-1 was also phased out over ozone depletion potential and in the 1990's California finally acknowledged that perc was not a VOC after all. More recently, SCAQMD withdrew its grant support for methyl siloxane cleaning solvent equipment, a replacement technology they had promoted, in response to new research data that raised potential health concerns.

TCATA member companies are among those responsible for the improvements in the environmental, health and safety performance results achieved to date. They are also investing in the ongoing development of alternative technologies and improvements in existing technologies, products, and work practices and believe that market forces will cause continued improvement without further regulatory changes. TCATA is supportive of all reasonable efforts at improvement of the existing regulation, without bringing unnecessary, onerous and hardship-inducing requirements to the small businesses that comprise the retail side of the fabric care industry.