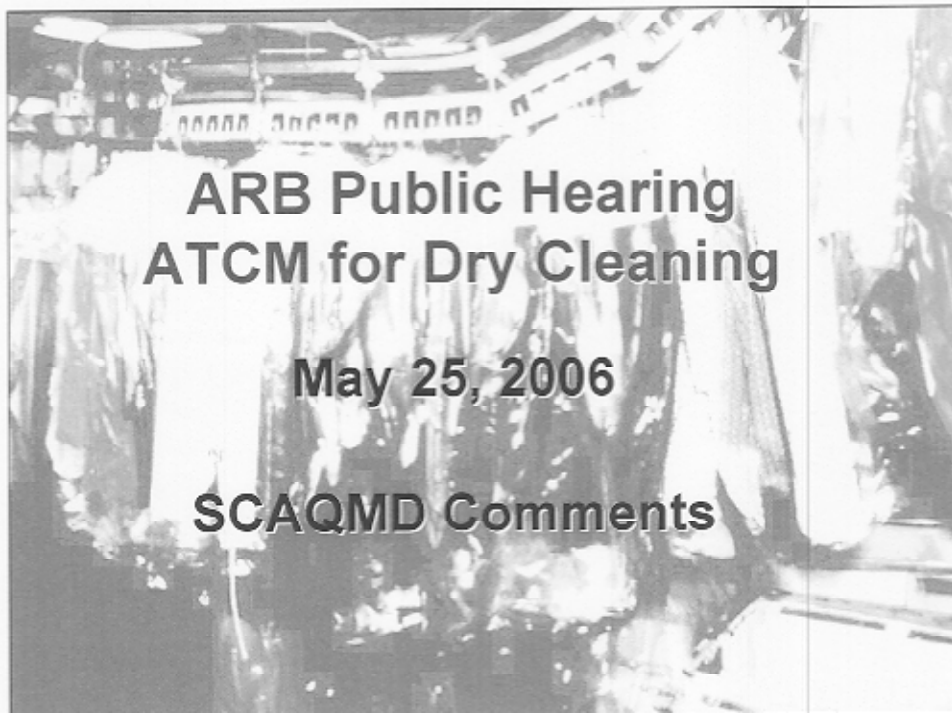


Claine Chang

06-5-2



Policy Recommendations

- Deem South Coast Rule 1421 equivalent
- Phase out perc
- At a minimum allow no new perc machines

Past Actions Regarding Perc by CARB Board

- April 2000 – Automotive Cleaners
 - Before: up to 50 to 60 in a million
 - After: perc ban (4.2 tpd)
 - VOC tradeoff: increase 1.3 – 2.3 tpd
- May 2000 – Aerosol Adhesives
 - Before: up to 30 in a million
 - After: perc ban (0.4 tpd)
 - VOC tradeoff: 0.3 tpd

Past Actions Regarding Perc By CARB Board (Cont)

- June 2000 – Aerosol Coatings
 - Before: not quantified
 - After: perc ban
 - VOC tradeoff: (short term 1.7 tpd shortfall)

Perc is a Toxic Air Contaminant (1991 TAC Identification)

“...The Board found that no threshold exposure level could be identified below which adverse health effects would not be expected.”

ARB Staff Report on Proposed ATCM, ES-1

(April 2006)

Health & Safety Code 39666 Adoption of Airborne Toxic Control Measures

“(c) ... the airborne toxic control measure shall be designed... to reduce emissions to the lowest level achievable through application of best available control technology or a more effective control method, unless the state board or a district board determines, based on an assessment of risk, that an alternative level of emission reduction is adequate or necessary to prevent an endangerment of public health.”

Cal EPA October 2004 EJ Action Plan

“...Evaluate whether additional precaution may be warranted in CAL/EPA’s environmental programs to address or prevent environmental justice problems.”

Objectives - 2.1 Develop Guidance on Precautionary Approaches