



# CALIFORNIA CLEANERS ASSOCIATION

of Dry Cleaners & Launderers

## OFFICERS

President  
Lynnette Watterson  
San Mateo

Vice President  
Bob Blackburn  
Porterville

Vice President  
David Suber  
Los Angeles

Treasurer  
Lenore Griffin  
Belmont

Immediate  
Past President  
Sonny Shah  
Ventura

## DIRECTORS

Aslam Lodhi  
Napa

Bobby Patel  
Costa Mesa

Marti Russell  
Stockton

Patrick Somers  
Indio

Claude Turpin  
Hollister

## ALLIED TRADES REPRESENTATIVES

Joven Lactaen  
Los Angeles

May 17, 2006

Clerk of the Board  
Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, CA 95814

Dear Sirs:

The proposed revisions to the current Air Toxics Control Measure (ATCM) relating to the operation of dry cleaners who utilize perchloroethylene (perc) are scheduled for hearing on Thursday, May 25, 2006 by the California Air Resources Board.

The California Cleaners Association recognizes and appreciates the work that was performed by CARB staff during the examination of the current ATCM. We are pleased that CARB staff recognizes the basic need for cleaners to have options regarding their choice and usage of dry cleaning solvents. Additionally, our industry is proud of achieving more than a 75 percent reduction in the amount of perc used in dry cleaning over the last decade.

However, on behalf of cleaners throughout the state of California, we are writing to express our concerns and respectfully recommend a limited number of changes to the proposed revisions to the ATCM.

### **Issue #1: Relocation Issues for Co-Residential Cleaners**

**The Problem:** While they comprise a small number of cleaners in California, we are concerned about the issue of co-residential cleaners as it relates to the definition of "new facilities."<sup>1</sup> Under the proposed changes, co-residential cleaners face the most stringent regulations and are forced to phase out use of perc by July 1, 2010.

Co-residential cleaners who are concerned about the potential risk to residents and thus relocate their facilities to locations that are not co-residential are penalized under the proposed ATCM changes. By relocating, they fit under the definition of "new facilities" and are then subject to limited location options.

---

<sup>1</sup> Under the proposed changes to the ATCM, facility relocations are considered new facilities. (Page A-5, definition 34)

**Proposed Solution:** We propose that the definition of “new facility” be amended and that language be added that allows any facility that operated in a co-residential location prior to July 1, 2007 and relocates prior to July 1, 2010, be considered an existing facility for the purposes of this control measure.

**Issue #2: Location Criteria for New Facilities**

Language in the proposed changes to the ATCM requires that new facilities are “located outside of and at least 300 feet from the boundary of an area that is zoned for residential use.”<sup>2</sup>

**The Problem:** In both urban and suburban areas, shopping centers and strip malls exist in zones that contain a mixture of businesses and residences (aka “mixed zones”). As interpreted, this provision forces cleaners to limited locations while providing little to no potential risk reduction to the public.

**The Solution:** We propose striking the language that states “the boundary of an area that is zoned for residential use” and replace with “nearest residence.” This change will still provide an appropriate zone of use and will mirror the proposed requirement that new facilities also be 300 feet from a sensitive receptor.

**Issue #3: Deadlines for Existing Facilities to Install Enhanced Ventilation Systems**

Language in the proposed changes to the ATCM mandates that existing facilities install an enhanced ventilation system no later than July 1, 2010 for facilities located more than 100 feet from a sensitive receptor. Those facilities within 100 feet of a sensitive receptor must comply by July 1, 2009.<sup>3</sup>

**The Problem:** An estimated 1,500 cleaners operate primary, converted or add-on secondary control machines. These cleaners are already facing deadlines to purchase new, integral secondary control machines at a cost of almost \$50,000. The average cost for installing an enhanced ventilation system is \$6,000. For many of these cleaners, the deadline for buying a new machine is the same date as installing an enhanced ventilation system. We are very concerned about the economic impact of these two requirements on cleaners.

**The Solution:** We propose adding language that grants a two year extension to the deadline for installing an enhanced ventilation system to existing facilities who replace their primary, converted or add-on secondary control machines between January 1, 2009 and December 31, 2010. We feel this will help to alleviate the impact on cleaners of having to buy a new machine and also install

---

<sup>2</sup> Page A-9, section (f)(1)(B)

<sup>3</sup> Page A-11 section (g)(2)(A&B)

an enhanced ventilation system at the same time while still reducing potential risk.

**Issue #4: Annual Leak Checks**

Current language in the proposed changes to the ATCM mandates that operators perform an annual leak check using a portable detector which gives quantitative results with less than ten percent uncertainty at 50 ppmv of Perc.<sup>4</sup>

**The Problem:** The few leak detectors that are considered acceptable by CARB staff for the annual leak check are prohibitively expensive for cleaners.<sup>5</sup> In meetings with staff, it was suggested that associations like ours purchase these detectors and loan them to cleaners. Unfortunately, these instruments are so sensitive that we are concerned about the accuracy of readings after undergoing packaging, shipment and delivery to a cleaner. Cleaners have the option of waiting until their annual inspection by their local air quality management district and having the inspector do the annual leak check for them. However, those cleaners who do so run the risk of immediately being cited for a violation should their machine not pass.

**The Solution:** We propose language be added to section (i)(3) which allows cleaners to have the annual leak check performed by their local air quality management district inspector and, if a leak is found, the cleaner be granted the same time period to correct the leak as is provided currently in section (i)(3)(E)(1) before a notice of violation can be issued.<sup>6</sup>

In conclusion, we believe that these suggested changes are consistent with the goals and intent of the proposed changes to the ATCM, while at the same time assisting cleaners in achieving additional reductions in solvent usage while meeting the goal of reducing emissions and potential risk. We appreciate the opportunity to provide input into the revision of the ATCM and are available to provide any additional information.

Sincerely,



Sandra Giarde  
Executive Director

---

<sup>4</sup> Page A-14 section (i)(3)(B)

<sup>5</sup> As an example, two of the detectors listed as acceptable by CARB staff are the IonScience PhoCheck 1000 which retails for \$1,995 and the Rae Systems MiniRae 2000 which retails for \$3,300.

<sup>6</sup> Page A-15 section (i)(3)(E)(1) states “If repair parts are not available at the facility, the parts shall be ordered within the next business day of detecting such a leak. Such repair parts shall be installed within two business days after receipt. A facility with a leak that has not been repaired by the 7<sup>th</sup> business day after detection shall not operate the dry cleaning machine, until the leak is repaired, without a leak-repair extension from the district.”