



January 18, 2007

Dr. Robert F. Sawyer, Chairman  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

VIA E-mail and Overnight Delivery

Dear Dr. Sawyer:

The Northern California Korean Drycleaners Association represents 1,450 small drycleaners who would be directly affected by the proposed revised ATCM for perchloroethylene (PERC) emissions from drycleaners, which is set for public hearing on January 25 in Sacramento. We believe that the proposed ATCM as currently written will have a devastating impact on our member's ability to continue in business.

On behalf of our members, I am requesting that the public hearing scheduled for January 25 be rescheduled or continued for at least 30 days. I would also request that if possible that the public meeting be held in the bay area to facilitate participation by our members. In making this request, I would note that your November 2006 hearing was held in San Francisco. We believe that such a delay and change in location is essential in order for our members to effectively participate in the public hearing process and to provide comments on the impacts that will result to their small businesses from adoption of the ATCM and for our association to develop a counter proposal to the staff proposal.

As you may or may not know, our members are in general either non-English speaking or use Korean as their primary language and we are aware and appreciative of the fact that the hearing notice and staff report were concurrently published in Korean, and that Board staff can provide some language assistance. However, most of our members do not have access to email or the internet. This has made it difficult for them access the regulatory documents. Further our members operate small business at which they often work 12 to 14 hour days which limits the time they have had available to review the proposed ATCM. In addition, our association's communication with our members is mainly by newsletter and telephone which has made it

difficult for us to communicate with them about your staff's proposal and its likely impacts on their ability to continue in business.

Again, in summary, our members are directly impacted by the proposed regulations and the communication issues described above will prevent our members from participating effectively in the public hearing if it is held on January 25<sup>th</sup> and prevent them from being able to develop and present reasonable alternatives to the proposed regulations, which the Board has an obligation to consider. Given this, I hope you will at least grant our request for a delay of at least 30 days, or, in the alternative, commit to a deferral of the Board's decision and a continuance of the January 25 hearing for another 30 days or more so that our members and any others similarly at a language disadvantage can testify at that time.

We will also be contacting your office shortly to request a meeting with you to discuss our concerns regarding the proposed ATCM and concepts we have identified in attempting to develop a counter proposal.

Thank you in advance for your attention to our requests.

Sincerely,

Lawrence S. Lim

Cc: Kathleen Witherspoon, Executive Officer  
Clerk of the Board  
CARB Ombudsman