



South Coast Air Quality Management District

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Office of the Executive Officer
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January 23, 2007

Ms. Catherine Witherspoon
Executive Officer
California Air Resources Board
1001 I Street
Sacramento CA 95812

Re: Proposed Amendments to the Airborne Toxic Control Measure for Emissions of Perchloroethylene Associated with Dry Cleaning Operations and Proposed Adoption of Requirements for Manufacturers and Distributors of Perchloroethylene

Dear Ms. Witherspoon

The South Coast Air Quality Management District (SCAQMD) staff is pleased to offer support for CARB staff's Proposed Amendments to the Air Toxics Control Measure for Emissions of Perchloroethylene Associated with Dry Cleaning Operations and Proposed Adoption of Requirements for Manufacturers and Distributors of Perchloroethylene. SCAQMD staff appreciates the work that CARB staff has done since the May public hearing to develop changes to the proposal that implement the CARB Board direction for a phase out of perchloroethylene. This will represent significant health benefits by reducing cancer risks near these facilities.

In 2006, approximately 3 tons per day of perchloroethylene was emitted from dry cleaners in the state of California. The Office of Environmental Health Hazard Assessment (OEHHA) determined that perchloroethylene is a potential human carcinogen with no identifiable threshold below which no carcinogenic effects are likely to occur. Since dry cleaners are typically located where it is convenient for customers, these facilities can pose high potential cancer risk to their neighbors. There are a variety of proven, cost-effective non-perchloroethylene alternatives that are in wide use throughout the state. Therefore, it is appropriate to phase out the use of this chemical.

The SCAQMD Governing Board adopted Rule 1421 – Control of Emissions from Perchloroethylene Dry Cleaning Systems in December 2002. More than one-third of existing dry cleaners in the South Coast have switched to non-perchloroethylene alternatives, and that trend is expected to continue. Rule 1421 has not allowed any new facilities to use perchloroethylene since January 1, 2003, requires interim risk reduction measures, and will achieve a full phase out of perchloroethylene two years earlier than the current CARB staff proposal. When considered in total, Rule 1421 and the proposed ATCM are substantially similar and should be found equivalent.

If you have any questions or would like to discuss this further, please call me at (909) 396-3131.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barry R. Wallerstein". The signature is fluid and cursive, with a large initial "B" and "W".

Barry R. Wallerstein, D.Env.
Executive Officer

cc: CARB Board Members

EC:JW