



January 24, 2007

Dr. Robert Sawyer  
Board Chair  
California Air Resources Board  
1101 I Street  
Sacramento CA 95814

Re: ATCM Perchloroethylene Dry Cleaning Proposed Amendment

I am writing this letter in support of California Air Resources Board (ARB) Alternative 1 proposal to phase out perchloroethylene (perc) dry cleaning and freeze VOC-containing dry cleaning systems.

Since 2000, our Center has developed and administered a large-scale demonstration program for non-toxic and non-smog forming garment care technologies. The results from the first phase of our demonstration program have been published in the February 2007 issue of the peer-reviewed *Journal of Air and Waste Management*.<sup>1</sup>

Findings from this study show that perc dry cleaners switching to professional wet cleaning:

- Successful cleaned the fully range of garments they previously dry cleaned.
- Retained nearly all of their customers.
- Had significantly lower operating costs.
- Had significantly lower energy use.

The results of this study affirm professional wet cleaning as a viable cost-effective, zero-emission, and energy-efficient technology.

Since 2000, there has been a substantial increase in installations of advanced professional wet cleaning systems in California – rising from 2 sites in 2000, to 10 sites in 2003, to 120 sites in 2006. Over the last three years, the rate of increase in professional wet cleaning has outpaced other non-VOC technologies, including Green Earth and CO<sub>2</sub>. (Unfortunately, the December 2006 Staff Report substantially underestimated professional wet cleaning installations between 2003 and 2006 -- counting 25 vs. 108 that actually installed.<sup>2</sup>

<sup>1</sup> Sinsheimer, P., Grout, C., Namkoong, A., Gottlieb, R., Latif, A. "The Viability of Professional Wet Cleaning as a Pollution Prevention Alternative to Perchloroethylene Dry Cleaning". *Journal of the Air & Waste Management Association*, Volume 57, February, 2007.

<sup>2</sup> See attached list of cleaners who installed wet clean systems between 11/2003 and 11/2006.

Being zero-emission, energy-efficient, and affordable, professional wet cleaning is exactly the kind of technology that should be fully supported by the Air Resources Board.

That is why Alternative 1, a phase out of perc and a freeze on VOC dry cleaning, is by far, the preferred choice. This is not only the most cost-effective option but the most health protective.<sup>3</sup> This option will eliminate the use of a toxic chemical, reduce future smog levels as well as reduce greenhouse gas emissions.

California has proven itself as the worldwide leader in environmental technology. Alternative 1 provides you the opportunity of continuing this leadership.

Sincerely,



Peter Sinsheimer  
Director, Pollution Prevention Center  
Occidental College

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<sup>3</sup> Staff Report estimates the cost-effectiveness of perc phase out only = \$3.10 / lb emission reduced vs. cost-effectiveness of perc and VOC phase out of \$2.60 / lb emission reduced. If the corrected rate of increase in professional wet cleaning between 2003 and 2006 is taken into account, the cost effectiveness of Alternative 1 (e.g. \$/lb emissions reduced) would be substantially lower.