



CITY AND COUNTY OF SAN FRANCISCO

COMMISSION ON THE ENVIRONMENT

November 30, 2009

GAVIN NEWSOM
MAYOR

JARED BLUMENFELD
DIRECTOR

PAUL PELOSI, JR.
PRESIDENT

RUTH GRAVANIS
VICE-PRESIDENT

ANGELO KING
COMMISSIONER

JANE MARTIN
COMMISSIONER

ALAN MOK
COMMISSIONER

MATT TUCHOW
COMMISSIONER

JOHANNA WALD
COMMISSIONER

MONICA FISH
COMMISSION SECRETARY

Ms. Pamela Torliatt
Board Chair
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Re: Request for partnership to promote least toxic dry cleaning technologies

Dear Madame Chair:

The San Francisco Commission on the Environment (Commission) advises the Mayor and the Board of Supervisors on environmental issues and sets policy for the San Francisco Department of the Environment (SFE). The Commission has been closely following the efforts undertaken by SFE to evaluate the potential alternatives to toxic dry cleaning solvents and promote the adoption of the least toxic alternatives by San Francisco businesses. Extensive analysis by SFE has revealed that the least toxic garment cleaning technologies currently on the market are Wet Cleaning and Carbon Dioxide.

We commend the Board's leadership in accelerating the removal of the known carcinogen and toxic air contaminant, perchloroethylene (perc), from our communities through the revision of BAAQMD Regulation 11-16 that phases out the use of this chemical in neighborhood dry cleaning facilities. We strongly support the option C proposal that will phase-out perc machines aged 8 years or older, yet we are concerned that the industry will replace their perc machines with systems that utilize smog-forming hydrocarbon solvents. Therefore, as a way to incentivize the switch to least toxic cleaning technologies, we propose that the Board consider **Option C with a provision to allow extensions of up to 6 months for cleaners switching to wet cleaning or CO₂ dry cleaning.**

San Francisco's Commission is not alone in its concern over the replacement of perc machines with hydrocarbon systems. In 2006, the California Air Resources Board (CARB) identified the industry shift toward hydrocarbon systems as a major concern due to the formation of smog. In San Francisco alone 55% of formerly perc cleaners (66) have switched to hydrocarbon cleaning while a majority of the rest (42.5%) are using perc and actively seeking alternatives. Based on our interviews with cleaners, we estimate that all these remaining perc cleaners will switch to hydrocarbon machines unless we collectively take urgent steps to promote the less toxic options of wet cleaning and CO₂ dry cleaning. If we are not successful in this effort 10,000 additional

pounds of VOCs will be emitted from San Francisco cleaners alone. In addition, each hydrocarbon cleaner emits an additional 3,833 pounds of greenhouse gases per year compared with a wet cleaner of the same size.

In an effort to avoid the regrettable substitution of perc for hydrocarbon solvents, SFE has partnered with CARB to reach out to our local dry cleaners and offer financial incentives to those willing to switch to Wet Cleaning technology. The Commission believes that BAAQMD should play a significant role in this partnership and lead the drive to protect human health and the environment. **Specifically, we ask that BAAQMD promote the use of Wet Cleaning and CO₂ technologies by emphasizing their environmental and regulatory benefits, and work with SFE to offer financial incentives to cleaners switching to these technologies.**

We request that the Board address these issues and work closely with the San Francisco Department of the Environment to meet our mutual goals of reducing green house gasses and toxic air contaminants and protecting the health of all Bay Area residents. If you have any questions, please contact Debbie Raphael at (415) 355-3711.

Sincerely,



Paul Pelosi, Jr.
President, SF Commission on the Environment