Outlook

[EXTERNAL] Proposed Amended Rule 1171

From Kathleen Wolf <katywolfirta@gmail.com>
Date Tue 4/8/2025 2:41 PM
To Christopher Bradley <cbradley@aqmd.gov>

1 attachment (25 KB)
P1004S1S.pdf;

I am writing with comments on proposed amended Rule 1171 "Solvent Cleaning Operations." During the workshop, one participant urged the District staff to remove the restriction for the Volatile Methyl Siloxanes (VMS) under (f) (3). I strongly urge you to keep the restriction in place.

OEHHA performed a review of the toxicity of D5, the VMS used in cleaning and dry cleaning applications, and they concluded that they had concerns about D5 toxicity and could not conclude that D5 is not toxic. A link to this document can be accessed at https://ww2.arb.ca.gov/sites/default/files/classic//toxics/dryclean/oehhad5review.pdf

EPA received the results of a cancer study on rodents and concluded that there may be a cancer hazard associated with D5. That document is attached to this email.

I am also providing a link to a report on tests of alternatives to D5 in cleaning applications that was performed several years ago by the Institute for Research and Technical Assistance (IRTA). The project was sponsored by HESIS and EPA and, although the report is very old, many of the conclusions on alternatives should still stand. The link to the report is https://www.irta.us/reports/Five%20Emerging%20Chemicals.pdf.

D5 did give a positive carcinogenicity result in an animal study. Although the results are not definitive, it is good public policy to err on the side of caution. Additional toxicity information may be available in the future that would resolve the issue. Until then, however, I would urge you to keep the restriction of VMS in the rule. It's worth noting that there was no definitive toxicity data on PCBTF until the last several years. Had the District exercised caution many years ago when exempting PCBTF, the action to ban it now may not have been necessary. PCBTF's structure, a benzene ring with a chlorine substituent, was indicative that it was likely to be a carcinogen.

The District has done excellent work on PAR1171 and I support your efforts strongly. If you have questions about these comments, please feel free to call me at (818) 371-9260

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