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Secretary for
Environmental Protection

Air Resources Board

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Arnold Schwarzenegger
Governor

February 8, 2008

Dear Executive Officers/Air Pollution Control Officers:

As you may know, the Air Resources Board (ARB/Board) administers the grant program for non-toxic and non-smog forming alternative dry cleaning solvents under the provisions of Assembly Bill (AB) 998. As part of the program and upon request, we review alternative solvents to determine whether they qualify under AB 998 to receive grant funding.

In September 2006, GreenEarth[®] (GreenEarth) requested the ARB to evaluate the health information for Decamethylcyclopentasiloxane, also known as D₅, the solvent used in GreenEarth. Consequently, we asked the Office of Environmental Health Hazard Assessment (OEHHA) to review the available information on the toxicity and persistence of D₅. OEHHA has now completed their analysis. Based on OEHHA's review and as discussed below, we have determined that D₅ does not qualify for grants under the AB 998 program. However, we believe that D₅ remains an acceptable dry cleaning solvent alternative.

OEHHA's recent in-depth evaluation of the available information concluded that exposure at the highest achievable vapor concentration of D₅ causes uterine tumors in rats. The materials presented by GreenEarth representatives, which include Silicones Environmental, Health and Safety Council of North America (SEHSC), make the argument that the uterine tumors in rats due to D₅ exposure occur by a mechanism not applicable to humans. However, OEHHA determined that, although the proposed mechanism is plausible, the data presently in hand are insufficient to allow definitive conclusions regarding the mode of action of D₅ tumorigenicity. OEHHA is also concerned about the potential non-carcinogenic effects associated with the use of D₅ and its apparent persistence in the environment and in animal and human tissues.

This assessment was made for the purposes of determining whether the use of D₅ as a dry cleaning substitute should be determined to be a non-toxic and non-smog forming substance under the AB 998 program. The available exposure information indicates that the use of D₅ as an alternative dry cleaning solvent will not pose an adverse health risk to the public living near businesses using D₅. Therefore, at this time, ARB sees no need to regulate its use in dry cleaning. However, it is important to remember that dry cleaning solvents must be used by operators in a manner responsible to the standards set by manufacturer guidelines and to maintain good dry cleaning practices.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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In November 2007, we received additional material and comments from SEHSC on the toxicity of D₅ and have forwarded this information to OEHHA. OEHHA has reviewed this material and has determined that the information does not change the conclusions of OEHHA's evaluation. You can view OEHHA's D₅ evaluation and SEHSC's submitted information on our website: <http://www.arb.ca.gov/toxics/dryclean/dryclean.htm>. In the near future, OEHHA's responses to SEHSC's comments will also be available on our website.

If you have any additional questions, please contact me at (916) 445-0650 or Mr. Robert Krieger, Manager, Emission Evaluation Section, at (916) 323-1202.

Sincerely,



Mr. Robert D. Fletcher, Chief
Stationary Source Division

cc: Mr. Robert Krieger, Manager
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