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February 10, 2006

EPA Docket Center (6102T)
Attention Docket ID No. OAR 2005-0155
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Via Electronic Mail: a-and-r-Docket@epa.gov

Re: *National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities, Proposed Amendments, 70 Fed. Reg. 75884 (December 21, 2005)*

Dear Sir or Madam:

The National Association of Clean Water Agencies (NACWA) thanks the U.S. Environmental Protection Agency (EPA) for this opportunity to comment on the proposed amendments to the dry cleaning maximum achievable control technology (MACT) standard (40 CFR Part 63, Subpart M). NACWA represents the interests of nearly 300 of the nation's publicly owned wastewater treatment works (POTWs), serving the majority of the sewered population in the United States, collectively treating and reclaiming over 18 billion gallons of wastewater every day.

Most if not all dry cleaners discharge their wastewater to the sanitary sewer system and therefore to a POTW. NACWA's public agency members are responsible for ensuring that discharges to their treatment plants will not disrupt their treatment operations or affect the quality of the residual solids generated from the treatment process. Most of NACWA's members operate pretreatment programs under authority from the Clean Water Act and develop local discharge limits necessary to protect their plants as well as human health and the environment. It is with this responsibility to protect human health and the environment in mind that we reviewed the proposed amendments. NACWA is concerned that EPA may be overlooking a potential exposure pathway for perchloroethylene (PCE) from dry cleaning facilities.

Specifically, at page 75890 of the December 21, 2005, proposed rule, EPA concludes that once PCE is emitted to the atmosphere as a vapor, it is not likely to partition significantly into soil, water or sediment. Based on this conclusion, EPA finds that the major exposure pathway is primarily inhalation. Also, at page 75891, EPA states that refrigerated condensers are the most effective method for reducing PCE from the drying cycle adding that "[t]hey are used to condense PCE vapor for reuse."

NACWA asks that EPA confirm that these last statements are scientifically sound and accurate. There seems to be a presumption that the condensed PCE is *always* recycled back to the cleaning process to be reused. While this may be the case,

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during the distillation process to recycle PCE, separator water is generated. This separator water may contain PCE in meaningful quantities (the saturation level for PCE is approximately 150 mg/l) and if discharged to the sewer could reach groundwaters through exfiltration (leakage from sewer lines due to deterioration). If PCE finds its way into groundwater then the assumption that the inhalation pathway represents the major risk exposure route for impacted individuals may not be entirely accurate.

Again, NACWA appreciates the opportunity to comment. If you have any questions about our comments, please contact me at 202/833-9106.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hornback".

Chris Hornback
Director, Regulatory Affairs