



# HSIA

halogenated  
solvents  
industry  
alliance, inc.

May 31, 2012

## **LETTER TO THE EDITOR – NATIONAL CLOTHESLINE**

Dear Editor:

Your May 2012 article entitled “Perc users should study alternatives” quotes DLI’s Jon Meijer as saying “I’m not convinced that perc producers will continue to sell perc to this [dry cleaning] market.” The manufacturers of perchloroethylene, or perc, that currently supply dry cleaners strongly disagree with these comments and are fully committed to continuing to support the dry cleaning market as long as there is a market. Mr. Meijer has not spoken to any of the manufacturers of perchloroethylene about their intent to be long-term suppliers to the dry cleaning industry and has no basis to question their commitment.

Perc has been extensively tested and studied and the US Environmental Protection Agency (EPA) released its comprehensive Integrated Risk Information System (IRIS) assessment on February 10, 2012. Mr. Meijer calling this assessment the “final dagger” for perc shows that he is uninformed. Perc was classified as “probably carcinogenic to humans” by the International Agency for Research on Cancer in 1995. EPA has regulated perc on the basis of potential carcinogenicity even longer than that. The only significant change made by the assessment is to lower the cancer potency factor for perc, thus indicating less hazard than EPA previously assumed.

Moreover, EPA stated in releasing the new assessment that “EPA does not believe that having your clothes dry cleaned with perc will result in an increased risk for adverse health effects.” This should be recognized as good news for the industry. The IRIS report should certainly not drive any dry cleaner away from the use of perc.

Mr. Meijer suggests that there is consumer and environmental pressure not to use perc. I would argue that consumers are more interested in receiving high quality dry cleaning than understanding what method is used to clean their clothes. When regulatory attention is focused on alternatives not currently regulated, such as n-propyl bromide or siloxanes, the active ingredient in Green Earth (for which EPA has announced it will conduct an IRIS assessment in 2013), loyal perc dry cleaners will be glad they did not follow Mr. Meijer’s ill-conceived advice. Perc dry cleaning is the subject of a comprehensive and mature regulatory framework at the federal level, and there is no indication that EPA is moving toward expanding the prohibition in the current NESHAP on existing perc machines after 2020 beyond residential facilities.

Mr. Meijer states that perc faces regulatory challenges at the state and local levels, and points to New Jersey and Illinois as examples. It is unbelievable that someone representing DLI would not have an accurate picture of activities on perc at the state level. The State of New Jersey has yet to release a final regulation but the proposed regulation does not ban perc. Rather, it promotes good product stewardship and only prohibits perc in co-located residential buildings and near sensitive receptors. HSIA actually hired a firm in New Jersey to help develop the proposed regulations. HSIA, the National Cleaners Association and the local Korean dry cleaners sat at the table with regulators – where was DLI? In Illinois, legislation has yet to pass the state legislature after having failed to be approved during the last legislative session.

In closing, let me state once again that the manufacturers of perc who currently support this application are fully committed to continuing to supply the 70 percent of dry cleaners that use perc as long as it is their solvent of choice.

Regards,

*Faye Graul*  
Executive Director