



August 15 2023

U.S. Environmental Protection Agency
Attention: Docket ID No. EPA-HQ-OPPT-2020-0720
The Honorable Michal I. Freedhoff, Ph.D.
Assistant Administrator Office of Chemical Safety and Pollution Prevention
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460
Via Electronic Submission: <https://www.regulations.gov>

Re: Perchloroethylene (PCE); Rulemaking Under Section 6(a) of the Toxic Substances Control Act (TSCA); Proposed Rule

Dear Freedhoff:

Thank you for the opportunity to comment on the “Perchloroethylene (PCE); Rulemaking Under Section 6(a) of the Toxic Substances Control Act (TSCA). The Drycleaning & Laundry Institute (DLI) is a national trade organization representing drycleaners across the U.S.

DLI is concerned about the smallest drycleaners who do not have the resources to purchase new equipment using alternative solvents. During the pandemic, nearly one-third of all drycleaners closed. The industry as a whole has already been weakened by the pandemic and the new rule disproportionately hurts the smallest business owners. Our chief concern with EPA’s proposed rule is the short phaseout time of 10 years, while most machines last 15-25 years. A 10 year phaseout would not allow cleaners that recently purchased a new perc machine to fully utilize that equipment.

We are asking EPA to extend the phaseout period to 15 years, which will allow the smallest cleaners to fully utilize their equipment.

If you have any additional questions, please do not hesitate to call me at 800-638-2627.

Sincerely,

Jon Meijer
Director of Membership