

February 13, 2023

Mr. Lanelle Wiggins
Office of Regulatory Policy and Management
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: My comments concerning the phaseout of trichloroethylene (TCE) and its impact on the drycleaning industry

Dear Mr. Wiggins,

It is the National Cleaners Association's opinion that a phaseout of TCE would have a negative economic impact on the drycleaning industry. The use of TCE as a stain removal agent is an integral part of the stain removal process. While there may be alternatives to TCE, in my professional opinion, these alternatives are not as effective as TCE when used on the spotting board. Therefore, the use of available alternatives would increase labor, supply, and utility costs by having to repeatedly reprocess stained garments. This would be especially burdensome on small volume "mom and pop" operations that have annual sales of \$250,000 - \$300,000. These operators work on thin profit margins and represent a major percentage of the drycleaning industry. If the condition of the garment could not be corrected and deemed to be unwearable by the consumer, it would be disposed of in a landfill. This would have a negative environmental impact since many garments contain plastic based synthetic fibers take a lifetime to degrade.

The following information will describe the economic impact that the phaseout of TCE would have on an average small volume drycleaner:

A small volume drycleaner runs 5 loads per day @ 1-1.5 hours per load for 6-7 hours per day

If an average of 2 garments/day require a stain removal treatment with TCE @ 4-10 minutes per garment, the spotter will use 8-20 labor minutes/day with an average of 14 minutes/garment or an average of 28 minutes for the 2 garment

average. If the stain cannot be removed on the first run using an alternative to TCE, it may have to be re-spotted and re-run 2-3 times, this would increase the labor minutes to an average of 28 labor minutes/day per garment, or 56 minutes a day for average of 2 garments. If the garment is re-processed 3 times, the labor minutes will increase to 42 minutes/day per garment or 84 minutes/day for the 2 garment average.

On a weekly basis (6 days) this will compute to 168 labor minutes/week or approximately 2½ labor hours when TCE is used on the 2 garments, or up to 504 labor minutes/week (or approximately 8½ labor hours) if the 2 garments are processed 3 times in an alternate to TCE.

The average spotter's salary is \$35.00/hour (including payroll expenses) Since the average spotter works 6 days (40 hours straight time and 8 hours overtime), their average salary/week, including overtime and payroll expenses would be \$1,840.00. Therefore, their average pay (including overtime) will cost their employer \$38.50/hour

If TCE is used, the average labor cost/week for the 2 garments is \$77.00. If an alternate to TCE is used, the labor cost/week will be \$327.50 (if the 3 garments are processed 3 times) Therefore, the labor costs using an alternate to TCE may more than quadruple the labor costs of servicing the garment using TCE.

I hope that the above-mentioned labor numbers will explain the devastating effect that the phaseout of TCE will have on the drycleaning industry.


Sincerely,

Alan Spielvogel
Director of Technical Services