



Wet Cleaning

the wave of the future™

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Donald Clark
Secretary
Federal Trade Commission
600 Pennsylvania Ave NW
Washington, DC 20580

Dear Secretary Clark:

The Center for Neighborhood Technology welcomes the FTC's consideration of a label which would specify wetcleaning as a care method because we understand that the lack of such a label is currently an obstacle to cleaner's greater utilization of this environmentally efficient process.

CNT is a Chicago based non-profit research and technical assistance agency which has worked with EPA and other stakeholders to test, demonstrate, and publicize alternative clothes cleaning processes. Professional wetcleaning, a range of techniques using water, special detergents and often computerized machines, is the most researched and promising of the emerging technologies to date.

In follow-up to the January 29 Workshop/Conference, I would like to make the following recommendations:

- **Keep the record open for 9-12 months**

This would allow interested stakeholders to work on establishing test methods for professional wetcleaning. CNT is committed to working with the American Association of Textile Chemists and Colorists, American Society for Testing and Materials and others to develop a draft protocol and appropriate symbols, and we have made these efforts a high priority by assigning Research Associate Anthony Star to this task. I am pleased to report that at the February 23 AATCC meeting, steps were taken to form a subcommittee to begin the development of the necessary test methods. However, it would be useful to all stakeholders if during this period, the FTC would convey some sense of its intended actions on this matter.

An alternative to keeping the record open would be to move forward with establishing a wetcleaning care label and giving a longer phase-in period (perhaps one year) to provide a strong incentive to the AATCC to complete the development of test methods.

- **Definition of Wetcleaning**

At the January 29 workshop there was some discussion of the definition of wetcleaning. CNT proposes the following modification and clarification of the two definitions discussed at the meeting. The format is intended to be consistent with ASTM and AATCC styles for definitions.

Wetcleaning, n- *in the care of textiles*, the professional care of consumer textile products with specially formulated chemicals and precise control over the mechanical properties of the washing, drying and finishing processes.

Discussion-The process is intended for sensitive and delicate fabrics made of wool, silk, rayon and other natural and man-made fibers. It is typically done in a computer-controlled washer and dryer utilizing biodegradable chemicals specifically designed for wetcleaning that are formulated from constituent chemicals on the EPA's public inventory of approved chemicals pursuant to the Toxic Substances Control Act. The washer's computer controls mechanical action, fluid levels, temperature, and extraction parameters. The dryer utilizes a residual moisture control sensor to prevent over drying.

Note: ASTM defines "professional care" as, "Overall cleaning and maintenance procedures requiring the services of a person specially trained or skilled in their use and usually earning a livelihood by their cleaning."

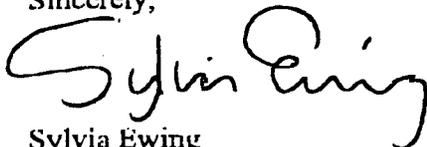
- **Consider a professional clean label**

CNT continues to believe that a "Professionally Clean" label would be of benefit to both cleaners and consumers. It would create a clear distinction for garments that cannot be cleaned at home. Professionally Clean would encompass wetcleaning as defined above, along with current and future technologies.

To assist the FTC in understanding how cleaners have currently implemented wetcleaning, I have also enclosed draft data from a project we are in the process of researching. We are creating profile studies of three wetcleaning shops that will report a variety of financial, consumer and process indicators. The enclosed data tracks care label, fiber type and cleaning process from a two-week period in November. We will repeat this study in the Spring of 1999.

Health, liability and regulatory concerns associated with the solvent currently used by drycleaners are clear indicators of the need to find other viable options for the fabricare professional. The technology or process that will replace perc as the process of choice is less certain. The FTC's willingness to address a proposed wetcleaning label is a service to cleaners and consumers. Additional time to examine the issue will benefit all concerned as well as make the adoption of future technologies easier.

Sincerely,



Sylvia Ewing
Pollution Prevention Manager

Enclosures

Nature's Cleaners
 North Andover, Massachusetts

Aquatex 40 Lb. Wetcleaning Machine
Aquatex Drying Cabinet

Wetcleaned [# of pieces]	Dry Clean	Dry Clean Only	Hand or Machine Wash	Hand Wash	Machine Wash	Missing/ Illegible	Other	Total
<i>Acetate</i>	3	12	0	0	2	0	0	17
<i>Cotton</i>	27	46	9	31	297	2	0	412
<i>Linen</i>	18	39	0	0	6	1	0	64
<i>Missing/Illegible</i>	3	4	0	0	1	13	0	21
<i>Other</i>	7	22	1	11	13	0	1	55
<i>Polyester</i>	12	39	1	8	38	1	0	99
<i>Rayon</i>	48	145	1	10	25	1	0	230
<i>Silk</i>	32	85	2	28	5	1	0	153
<i>Wool</i>	160	312	1	15	17	2	0	507
Total	310	704	15	103	404	21	1	1558

**Colonial Cleaners
 Minneapolis, Minnesota**

*Aqua Clean 30 Lb. Wetcleaning Machine
 Vic 35 Lb. Drycleaning Machine*

All Garments [# of pieces]	Dry Clean	Dry Clean Only	Hand or Machine Wash	Hand Wash	Machine Wash	Missing/ Illegible	Total
Acetate	0	9	0	0	0	0	9
Cotton	9	64	2	12	152	0	239
Linen	2	39	0	8	10	0	59
Other	2	19	0	3	11	0	35
Polyester		13	1	0	19	0	33
Rayon	38	165	6	9	31	3	252
Silk	19	104	0	2	5	0	130
Wool	49	371	0	1	4	3	428
Total	119	784	9	35	232	6	1185

Wetcleaned [# of pieces]	Dry Clean	Dry Clean Only	Hand or Machine Wash	Hand Wash	Machine Wash	Missing/ Illegible	Total
Acetate	0	2	0	0	0	0	2
Cotton	2	38	2	12	142	0	196
Linen	0	13	0	4	8	0	25
Other	2	14	0	2	9	0	27
Polyester	0	5	1	0	17	0	23
Rayon	6	38	5	8	12	1	70
Silk	4	30	0	2	4	0	40
Wool	1	34	0	0	1	0	36
Total	15	174	8	28	193	1	419

Drycleaned [# of pieces]	Dry Clean	Dry Clean Only	Hand or Machine Wash	Hand Wash	Machine Wash	Missing/ Illegible	Total
Acetate	0	7	0	0	0	0	7
Cotton	7	26	0	0	10	0	43
Linen	2	26	0	4	2	0	34
Other	0	5	0	1	2	0	8
Polyester	0	8	0	0	2	0	10
Rayon	32	127	1	1	19	2	182
Silk	15	74	0	0	1	0	90
Wool	48	337	0	1	3	3	392
Total	104	610	1	7	39	5	766

Natural Cleaners
 Bayside, Wisconsin

Unimac 30 lb. Wetcleaning Machine
Union 35 Lb. Drycleaning Machine

All Garments [# of pieces]	Dry Clean	Dry Clean Only	Hand or Machine Wash	Hand Wash	Machine Wash	Missing/ Illegible	Total
Acetate	3	1	0	1	0	0	5
Cotton	16	18	6	5	162	1	208
Linen	3	9	0	0	0	0	12
Missing/Illegible	0	5	0	0	1	43	49
Other	8	6	0	2	2	0	18
Polyester	7	6	0	0	5	1	19
Rayon	30	49	0	6	1	0	86
Silk	15	22	1	12	3	0	53
Wool	185	149	0	1	3	1	339
Total	267	265	7	27	177	46	789

Wetcleaned [# of pieces]	Dry Clean	Dry Clean Only	Hand or Machine Wash	Hand Wash	Machine Wash	Missing/ Illegible	Total
Acetate	2	0	0	1	0	0	3
Cotton	15	15	6	5	162	1	204
Linen	1	3	0	0	0	0	4
Missing/Illegible	0	2	0	0	1	14	17
Other	6	5	0	2	2	0	15
Polyester	7	4	0	0	5	1	17
Rayon	9	13	0	6	1	0	29
Silk	10	15	1	12	3	0	41
Wool	33	33	0	1	3	0	70
Total	83	90	7	27	177	16	400

Drycleaned [# of pieces]	Dry Clean	Dry Clean Only	Hand or Machine Wash	Hand Wash	Machine Wash	Missing/ Illegible	Total
Acetate	1	1	0	0	0	0	2
Cotton	1	3	0	0	0	0	4
Linen	2	6	0	0	0	0	8
Missing/Illegible	0	3	0	0	0	29	32
Other	2	1	0	0	0	0	3
Polyester	0	2	0	0	0	0	2
Rayon	21	36	0	0	0	0	57
Silk	5	7	0	0	0	0	12
Wool	152	116	0	0	0	1	269
Total	184	175	0	0	0	30	389