

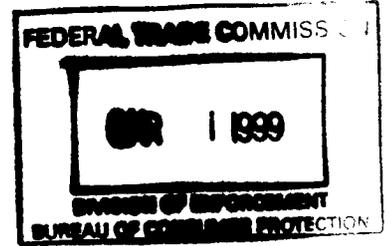
RAWHIDE CLEANERS

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2208 HWY. 281 MARBLE FALLS, TEXAS 78654
(830) 693-1445 FAX (830) 693-0146

Mr. James Mills
Division of Enforcement
Room 4616
Federal Trade Commission
600 Pennsylvania Ave. NW
Washington DC, 20580

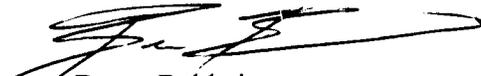
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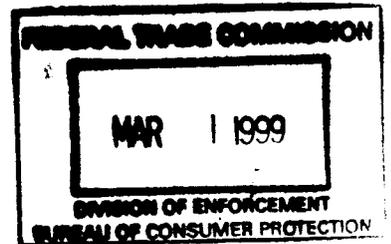


Dear Mr. Mills:

Here are the two letters that I sent in, the first in mid June and the second at the end of June 1998. I hope you will get them included in the register.

Thank you for your assistance,


Bruce Baldwin

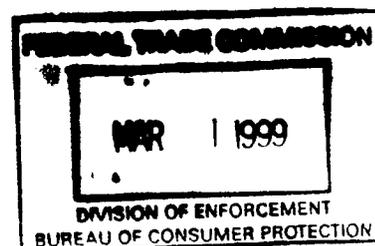


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Federal Trade Commission
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Washington, DC 20580



RE: 16 CFR Part 423 - Care Label Rule

Dear Federal Trade Commissioners:

I received a copy of the federal register dated May 8, 1998 and found it quite interesting. I was impressed with the fact that you seemed to read all letters sent to you and that you continually asked for more input. I was amazed that there was not more input from our industry, I can only assume that it is either because our industry has been treated so unfairly by the government in recent years or because they have not been aware of this.

Please let me introduce myself. My name is Bruce Baldwin and I am currently serving as the President of the Southwest Drycleaners Association, an organization serving over 600 Drycleaners and Launderers in the states of Texas, New Mexico, Oklahoma, and Arkansas. I would like to share some thoughts that I had while reading the register. There seems to be several underlying assumptions in this document that I believe need serious questioning. The first of which is that the Environmental Protection Agency (who seems to be the one initiating the requested changes) is some kind of expert in the Drycleaning, Laundry, and home laundering fields. This is far from the truth and is hardly worth debating. The second assumption is that the dry-cleaning industry uses perchloroethylene (or perc as it is commonly known) as it's one and only solvent and that it is an environmentally dangerous chemical to use for this purpose. Actually perc is a very good solvent and it's only serious danger is when it enters the ground. Its usage has been so improved over the past 10 to 15 years that even though more clothes are cleaned in it every year usage of the solvent has been reduced by 75%. How clean would our air be if the automobile industry had this type of record? This is a huge success for technology in our industry, an industry which was one of the first to initiate recycling. The controlled conditions and regulations for perc's use make it more and more unlikely to get into the soil. Additionally there are very many alternative solvents being used and in development at this time, one of which is carbon dioxide which has the potential of actually cleaning the air as it cleans clothes! It would be a shame (and embarrassment) to introduce labeling that omits dry-cleaning as an acceptable method for cleaning garments from the care label, when it could be the most environmentally preferable method in the near future! This brings me to the third assumption, that cleaning in water is a better, more environmentally friendly, and a less expensive alternative. In order to understand the environmental impact of something you must consider more than just surface information. It has been proven, by the International Fabricare Institute, that clothing dry-cleaned will last 3 times as long as clothing laundered in home washers, and although it has not yet been examined for commercial wetcleaning, I believe (being one that uses commercial wet cleaning in my own operations) that it will be found to have similar fabric-life reducing effects. What environmental impact is there from producing 3 times as much clothing? What is the economic impact of purchasing three times as many clothes? What happens in areas where drinking water

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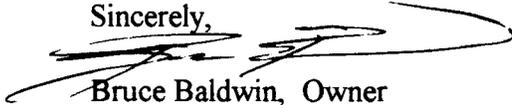
is the most important and scarcest resource, should we be washing with 3 gallons of water usage per pound of clothes, or should we be saving water and sewage treatment facilities by using drycleaning fluid (which for the same 3 gallons of perc usage can clean 1600 pounds of clothing).

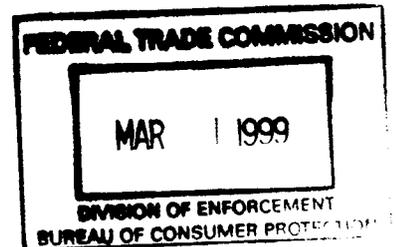
Another issue I find grossly unfair and potentially damaging to our industry is that you are proposing that home washing instructions be required, but dry cleaning instructions not. This would mean that many garments would now be labeled home washing that would previously have been labeled dry-clean. Please consider that the drycleaning industry is by far a very small business industry, and this could damage these small businesses by potentially millions of dollars. I think you need to reconsider the economic impact of these changes as the Regulatory Flexibility Act, 5 U.S.C. 601-12 requires.

On another issue I think it would be more advantageous to have actual temperatures listed rather than words such as cold warm and hot when these words can prove to be ineffective, as your document states. It can only be determined by each person washing, what the actual temperature coming out of their machine is. It is extremely important for our industry to know fabric content, actual temperatures, and if drycleaning, and/or washing alternatives are acceptable.

I am confident that you will consider my comments, and make the appropriate decisions. I would welcome the opportunity to discuss this further with you, and if needed we can have a committee in our association work on suggestions and possible solutions if you would find this helpful. We are interested in fairness to all involved.

Sincerely,

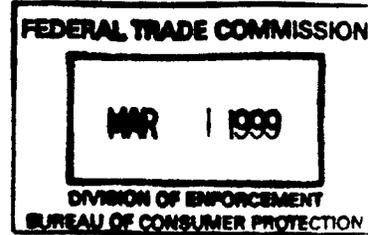

Bruce Baldwin, Owner
Rawhide Cleaners, Rawhide LeatherCare



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RE: Follow-up letter on 16 CFR Part 423 - Care Label Rule

Dear Commissioners:

After sending my previous letter there was another point I wanted to share with you before you made your decision. There are two reasons the EPA wants to reduce the use of drycleaning solvents:

1. Air contamination, which they believe causes cancer, but which if you eliminate junk science (as the courts have), and you look at workers exposed for long periods, it shows that this is not a true problem.
2. Ground contamination, which was caused by minute amounts of solvent (from older designed equipment), being sent down the sewer. We now know that sewers leak, and this has caused ground contamination.

Because our industry now understands the problem, new equipment eliminates sewer discharge. There are also numerous regulations to prevent this from happening. There has been a dramatic reduction in solvent use. Drycleaners are under the watchful eye of the government.

The reason this is important is that there are three types of stains in clothing, water soluble stains which can be removed by water based chemicals, insoluble stains which are only removed by mechanical action, and solvent soluble stains which are removed by solvents. If you eliminate drycleaning and have home washing replacing it, you will have the same stains. The difference is instead of a trained, regulated, and experienced Drycleaner using the spotting chemicals, you will now have an unregulated, unknowledgeable, untrained consumer that has no idea that they are contaminating the earth by the way they are using these chemicals. You will be eliminating all the check points that were learned from the past. Drycleaners have these chemicals removed from their equipment and picked up by a hazardous waste handler! Why would you want to let consumers send these chemicals down the sewer? In Texas we are suffering from drought. When you have drought conditions you want to conserve water, not increase it's use. We also don't want to contaminate the limited amount of water we have! Drycleaning is a benefit to society, its elimination would be a terrible mistake! It will not accomplish what the EPA intends it to, it will only compound the problem.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Baldwin".

Bruce Baldwin, owner
Rawhide Cleaners
President, Southwest Drycleaners Association