

March 1, 1999

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Office of the Secretary
Federal Trade Commission Suite 4302
c/o Connie Vecellio, James Mills
Sixth & Pennsylvania, N.W.
Washington, D.C. 20580

Re: 16 C.F.R. Part 423 – Care Labeling Rule

Dear Mr. Secretary:

The Korean Youth & Community Center (KYCC) is pleased to submit our comments on the Federal Trade Commission's (FTC) proposed amendments to 16 CFR 423, Care Labeling Rule. As a technical assistance provider to Korean owned small businesses, especially dry cleaners, we strongly recommend that the FTC *require* a professional wet cleaning label which should be implemented as soon as possible.

KYCC is a multi-service agency located in the Koreatown area of Los Angeles and was established in 1975. Our programs include youth and family counseling, educational and after-school programs, affordable housing, environmental services, and business services & development. The majority of Korean immigrants owns and operates small family businesses that provide a livelihood for themselves and their neighborhoods. KYCC recognizes that language and cultural barriers can hinder the operation and growth of these businesses. We strive to provide information, resources and the tools that business owners need to make their business successful.

Approximately 50% of the dry cleaners in the Greater Los Angeles area are owned by Korean entrepreneurs. To provide information and resources to this significant portion of the dry cleaning community, KYCC began the Cleaners Assistance Program (CAP) in 1996. Since that time, we have provided accurate, timely, and linguistically and culturally appropriate information on new technologies in the garment care industry to over 700 Korean dry cleaners. Since wet cleaning has proven to be the most viable alternative thus far, KYCC hosts demonstration tours and intensive workshops (over 100 Korean cleaners have attended thus far) on the wet cleaning process with Cypress Plaza Cleaners. Cypress Plaza Cleaners is owned and operated by Mr. Joe Whang, a Korean cleaner who converted to wet cleaning after 12 years as a dry cleaner. KYCC provided technical assistance and

support to Mr. Whang throughout the conversion process and is committed to continually providing assistance. KYCC's wet cleaning resources include a bilingual information packet, a bilingual wet cleaning video, financing resources, training resources, and wet cleaning-specific as well as general business technical assistance.

It is our recommendation that the FTC require a wet clean care label. Simply allowing a wet clean care label is in effect, the same as not having a label at all. KYCC has close ties to the garment manufacturing industry in Los Angeles, 80-90% of whom are Korean. Our informal discussions with garment manufacturers have shown that no manufacturer will incur additional costs for a wet clean care label if it is not required of them. Whether Korean or not, it is a basic business instinct to reduce costs. No manufacturer will voluntarily incur the additional costs of a wet clean care label that is simply *allowed* by the FTC. In order for a wet clean care label to actually exist in a real-world sense, a wet clean care label must be required.

We recognize that a standard definition of wet cleaning and a test method are needed for a wet clean label. KYCC supports the use of the modified FTC definition for wet cleaning which includes the use of specialized tensioning equipment. As for the development of a standardized test method, the best "labs" are commercial wet cleaners who wet clean garments everyday and whose livelihood depends on the quality of the cleaning. In our opinion, it is these cleaners who will have the most up-to-date and effective methods for cleaning and have a natural incentive to continually find the best method possible for cleaning a wide range of garments. We strongly urge the FTC to utilize commercial cleaners to establish a standardized test method for wet cleaning.

Again, we understand the importance of a standardized test method and a formal definition of wet cleaning in order to implement a wet clean care label. *However, the lack of such does not reduce the need for a wet clean care label.* In speaking with many dry cleaners, many recognize that the wet cleaning process itself is viable and the quality and performance of wet cleaning is equal and sometimes better than dry cleaning. A significant number of cleaners have stated that they would wet clean if there were stronger policy and regulatory mechanisms such as a care label. Many express fears of dealing with claims from customers without a wet clean care label, recognizing that it is the only line of defense in a claim with a customer. As it is, many Korean cleaners are uncomfortable with claims, with the situation being exacerbated by language and cultural barriers. Many cleaners are reluctant to utilize wet cleaning without a wet clean care label. With a wet clean label, more cleaners would be encouraged to wet clean which would in turn, reduce or eliminate the health risks and environmental pollution associated with perc-based dry cleaning.

Our own analysis of Cypress Plaza Cleaners shows that wet cleaning is viable as a business with equal or better cleaning quality than dry cleaning. Sales have remained stable and the number of customer claims has remained relatively the same. Please see Attachment A, our performance and financial evaluation of Cypress Plaza Cleaners. In order to encourage dry cleaners to wet clean as well as encourage wet cleaners to continue

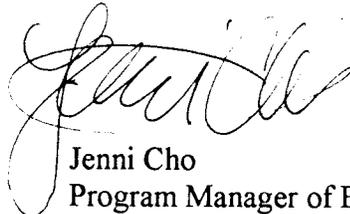
wet cleaning, a wet clean care label rule must be implemented as soon as possible. Without one, wet cleaners will have to continue to work with a disadvantage compared to dry cleaners who have a care label to back them up. The lack of a label will prevent dry cleaners from wet cleaning and will prevent wet cleaners from really expanding and growing their business. As it is now, dry cleaners have an unfair competitive edge over wet cleaners because garment manufacturers are only required to have dry clean labels. Any further delay in the process is not productive and will only work against those who have made a conscience choice to contribute to the health and well-being of the environment in their communities.

Thank you again for the opportunity to comment on the amendments to the FTC Care Labeling Rule. If you have any questions or need further information, please feel free to call KYCC for further discussion on the issues stated above.

Sincerely,



John Ho Song
Executive Director



Jenni Cho
Program Manager of Business Development

ATTACHMENT A

CONVERTING FROM DRY CLEANING TO WET CLEANING:
A PERFORMANCE AND FINANCIAL EVALUATION OF CYPRESS PLAZA CLEANERS

DECEMBER 29, 1998

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&

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1. INTRODUCTION

This report, "Converting From Dry Cleaning to Wet Cleaning: A Performance and Financial Evaluation of Cypress Plaza Cleaners", seeks to assess both the capability of a cleaner to professionally wet clean customer garments that they had previously dry cleaned as well as the financial impact of purchasing and operating wet clean equipment compared to purchasing and operating PCE-dry clean equipment.

Cypress Plaza Cleaners, located in Cypress California, is owned by Joe Whang, a first generation Korean immigrant. The cleaner processes approximately 600 garments per week generating \$100,000 in total revenue. In many ways Cypress Plaza Cleaners fits the profile of most professional cleaning businesses. Over 60% of all professional cleaners are sole proprietorships and over 85% generate revenues of \$100,000 or less. In addition, over half of all cleaners in the greater Los Angeles Basin are owned by Koreans.

In April 1998, Cypress Plaza Cleaners switched from operating dry clean equipment to operating wet clean equipment to clean their customers' garments. Prior to April 1998, the cleaner had used a Val-Clean dry cleaning system which it had operated for the previous twelve years. Cypress Plaza Cleaners decided to purchase a new cleaning system because the supply of the Val-Clean solvent had become not only scarce but expensive, due to the fact that Val-Clean dry clean systems can no longer be purchased in the United States. The two options the owner of Cypress Plaza Cleaners considered were a PCE-dry clean system or a wet clean system.

This report evaluates the consequences of Cypress Plaza Cleaners' choice to purchase and operate wet cleaning equipment to clean customer garments.

2. METHOD

A structured interview was developed which assessed the quality of cleaning and the financial capability of Cypress Plaza Cleaners both before and after switching from dry cleaning to wet cleaning. This questionnaire was administered in September 1998, six months after the cleaner switched to wet cleaning. This six month period covered both a three month transition period and a three month post-transition period. In addition, a follow-up interview was carried out in December 1998 to assess whether any additional changes in the quality of cleaning or financial factors had occurred. The initial interview was conducted with the owner at Cypress Plaza Cleaners. The follow-up interview was conducted by telephone.

3. RESULTS

3.1 Performance Evaluation

The performance evaluation was designed to assess the capacity of Cypress Plaza Cleaners to professionally wet clean customer garments that they had previously dry cleaned before they converted. A number of different approaches were undertaken to carry out this assessment. First, a *customer garment profile* was carried out to assess how closely the types of garments cleaned at Cypress Plaza Cleaners mirrored a typical dry cleaner. Second, a *problem garment profile* evaluated the degree of difficulty experienced at Cypress Plaza Cleaners in successfully cleaning garments brought in by customers before and after switching from dry cleaning to professional wet cleaning. Third, a customer response assessment was undertaken to gauge how customers using Cypress Plaza Cleaners have responded to the cleaner switching from dry cleaning to wet cleaning.

Customer Garment Profile

A profile of customer garments cleaned at Cypress Plaza Cleaners was undertaken to assess volume and type of garments cleaned.

Volume

Cypress Plaza Cleaners is presently wet cleaning approximately one hundred garments per day. This is the same volume as it cleaned before the switch from dry cleaning to wet cleaning. (See Table 1) This consistency in volume is due to the fact that the customer base at the professional cleaners has not changed appreciably since switching from dry cleaning to wet cleaning. The owner of Cypress Plaza Cleaners reported that while there has been a five percent loss in customers since switching to wet cleaning the cleaner has also increased its customer base by five percent.

Table 1: Garments Cleaned at Cypress Plaza Cleaners

Cypress Plaza Cleaners	Date	Garments/Day
Dry Cleaning	< April 1998	100
Wet Cleaning	> April 1998	100

Garment Type

Approximately 70% of garments wet cleaned at Cypress Plaza Cleaners are pants and shirts or blouses. (See Table 2) This is similar to the mix found at other professional cleaners (PPERC, p.3-3).¹ In addition, the owner reported that the proportions of

¹ PPERC refers to the reported produced by the Pollution Prevention Education and Research Center entitled *Pollution Prevention in the Garment Care Industry: Assessing the Viability of Professional Wet Cleaning*, December 1997.

garment types cleaned has not changed since switching from dry cleaning to wet cleaning.

Table 2: Distribution of Garments Cleaned at Cypress Plaza Cleaners

Garment Type	Proportion
Pants	30%
Shirts/Blouses	40%
Skirts	10%
Jackets	10%
Dresses	10%

Fiber Type

Over three-fourths of the garments cleaned at Cypress Plaza Cleaners are from fibers that are typically labeled “dry clean”. (See Table 3) These include rayon, wool, silk, linen, and polyester. This proportion has not changed since switching from dry cleaning to wet cleaning.

Table 3: Distribution of Fiber Types Cleaned at Cypress Plaza Cleaners

Fiber Type	Proportion
Wool	20%
Rayon	30%
Cotton	20%
Silk	10%
Other – Linen, Polyester	20%

Care Label

The owner of Cypress Plaza Cleaners reports that 95% of garments processed at his cleaners carry a “dry clean” care label. Typically, only two-thirds of garments processed at dry cleaners carry a “dry clean” care label. (PPEREC, p.3-6)

Table 4: Distribution of Care Labels on Clothes at Cypress Plaza Cleaners

Care Label	Proportion
“Dry Clean”	95%
Other	5%

Problem Garment Profile

A problem garment profile assessed the degree of difficulty that Cypress Plaza Cleaners has experienced in successfully cleaning customers’ garments. Three types of

problems were assessed: Garments Dry Cleaned – garments sent out to a dry cleaner; Redos – garments returned by customers for additional work; Claims or Store Credit – compensation to customers, either in money or credit, for garments that were ruined in cleaning. (See Table 5)

Table 5: Proportion Sent Out for Dry Cleaning, Redo Rate, and Claims or Store Rate at Cypress Plaza Cleaners

	Before	Transition (4/98-6/98)	Post-Transition (7/98-12/98)
Sent Out for Dry Cleaning	NA	0.52%	0.15%
		(40 of 7,800 garments)	(22/14,900 garments)
Redo	0.007%	0.05%	0.033%
	(2 of 30,000 garments)	(4 of 7,800 garments)	(5 of 14,900 garments)
Claims/Store Credit	0.007%	0.064%	0.007%
	(2 of 30,000 garments)	(5 of 7,800 garments)	(1 of 14,900 garments)

Garments Sent Out for Dry Cleaning

During the first three months after Cypress Plaza Cleaners switched from dry cleaning to wet cleaning (April 1998-June 1998) a total of 40 of the 7,800 garments taken in by the cleaner were sent off-site to a dry cleaner. Most of these garments taken to be dry cleaned were women’s rayon jackets or two piece rayon suits which the owner said took too much time to press with conventional finishing equipment – taking as much as 15 to 20 minutes to finish. In July 1998, the owner of Cypress Plaza Cleaners purchased a tensioning form fitter, a specialized piece of pressing equipment used in wet cleaning to finish jackets. Using the tensioning equipment has increased the cost-effectiveness of finishing rayon jackets, as reflected in the fact that the wet cleaner now sends one fourth as many garments out to be dry cleaned – from 0.52% to 0.15%. In other words, in the post-transition period Cypress Plaza Cleaners has wet cleaned 99.85% of customer garments – 95% of which carry the “dry clean” label.

The proportion of garments rejected for wet cleaning by Cypress Plaza Cleaners during its post-transition period (0.15%) is almost identical to the proportion of garments that Cleaner by Nature, another wet cleaner in the region, rejected in its post-start-up period (0.12%) (PPEREC p.3-9). While Cleaner by Nature noted that color migration was the primary reason why it rejected garments to be wet cleaned, long finishing time was the primary reason given at Cypress Plaza Cleaners for rejecting a garment for wet cleaning.

Redos

Before Cypress Plaza Cleaners switched from dry cleaning to wet cleaning, the owner estimated that of the 30,000 garments cleaned each year only 2 garments would be returned by customers for additional work. (See Table 5) The reason was usually due to shrinkage. While in the transition period, just after the cleaner switched to wet cleaning, the redo rate increased to 4 of 7,800 garments cleaned, in the post-transition period this rate has been cut in half. Shrinkage in pants and skirts was the primary reason given by the owner for why customers return garments that have been wet cleaned. The owner expects that this rate is likely to fall even further when they are able to purchase a tensioning pants finisher. In addition, the owner felt that the more experience a presser has with finishing wet cleaned garments the greater the skill they acquire in releasing the shrinkage that may have occurred after the garment was wet cleaned and dried.

While the redo rate at Cypress Plaza Cleaner was higher in the post-transition period than when the cleaner used dry clean equipment (0.033% vs. 0.007%) both of these rates were substantially lower than the redo rate reported by other professional cleaners in the region. Cleaner by Nature, another wet cleaner, reported a redo rate in their post-start-up period of 0.45%, while a high-end dry cleaner reported that 0.45% of customers garments were returned for additional work (PPEREC, p.3-13).

The owner noted that most of the problems with shrinkage could be reduced if the garments were re-manufactured with wet cleaning in mind.

Claims or store credit

Before Cypress Plaza Cleaners switched from dry cleaning to wet cleaning, the owner estimated that on average of the 30,000 garments cleaned each year only 2 garments would be ruined to the point where they paid a claim or gave a customer store credit – a rate of 0.007%. (See Table 7) Usually the problem was due to color bleeding. In the transition period, 5 of the 7,800 garments were ruined to the point where a claim was paid or store credit was received. In the post-transition period, a claim was paid for only one of the 14,900 garments cleaned – the same rate as before the cleaner switched from dry cleaning to wet cleaning. The owner noted that since switching to wet cleaning all of the garments for which a claim or store credit was paid were due to shrinkage in poorly manufactured rayon or rayon blend garments.

The rate at which claims or store credit occurs at Cypress Plaza Cleaners in its post-transition period (0.007%) is substantially lower than two other professional cleaner in the region for whom this data has been collected. Cleaner by Nature, another wet cleaner, reported a claims and store credit rate of 0.047% in their post-start-up while a high-end dry cleaner reported a rate of 0.015% (PPEREC, p.3-10). It is important to

note that factors other than the frequency and degree to which garments are ruined are likely to determine the claim and store credit rate at each cleaner. These factors include the specific business practice of a cleaner (e.g. some cleaner are more willing to give a claim or store credit to retain customers than others) as well as the expectation of customers (e.g. customers using a high-end cleaner pay more and thus may have a higher expectation about the quality of cleaning than customers using budget cleaners). (PPEREC, p. 3-15).

Customer Response Assessment

Cypress Plaza Cleaners removed their Val-Clean dry clean machine and installed their wet clean washer and dryer on April 6th 1998. From this time on all customer garments cleaned at Cypress Plaza Cleaners that were previously dry cleaned were wet cleaned. After the wet clean equipment was installed, the owner of Cypress Plaza Cleaners put a sign up at the counter explaining that the cleaner was now using wet cleaning to professionally clean garments.

The owner of Cypress Plaza Cleaners has noticed very little reaction among his customers to the switch from dry cleaning to wet cleaning. Some women have noted that since switching to wet cleaning there is no longer an odor to the garments. In terms of a negative response, some customers have expressed a concern about shrinkage. The cleaner noticed that customers with cheaper garments are more likely to complain about shrinkage while people with more expensive garments have not mentioned a problem.

In terms of the impact of switching on the cleaner's customer base, the owner has reported that in the first seven months since switching to wet cleaning 2-3% of his customers had stopped using the cleaner because they were dissatisfied with the amount of shrinkage in their garments. On the other hand, the cleaner has gained 2-3% of new customers due to the fact that the cleaner is now using wet cleaning.

3.2 Financial Evaluation

In April 1998, Cypress Plaza Cleaners switched from using a Val-Clean dry clean system to using a wet clean system to professionally clean their customers' garments. Because Val-Clean dry clean systems can no longer be purchased in the United States, the supply of Val-Clean solvent had not only become scarce but expensive. Thus, the owner of Cypress Plaza Cleaners wanted to purchase a different professional cleaning system. The two options the owner considered were a PCE-dry clean system or a wet clean system. This financial analysis is based on the actual costs of converting Cypress Plaza Cleaners from a dry cleaner to a wet cleaner, revenue generated before and after the conversion, operating expenses incurred since switching to professional wet cleaning, and what the operating expenses would have been if the cleaner had purchased a PCE-dry cleaning system.

This financial analysis is based on the actual revenues generated and expenses incurred at Cypress Plaza Cleaners. Three evaluations were undertaken. The first, a *conversion cost assessment* tallied the specific costs incurred at Cypress Plaza Cleaners. Second a *revenue assessment* calculated the monthly revenue generated at Cypress Plaza Cleaners before and after the cleaner converted from dry cleaning to wet cleaning. Finally, a *process-dependent expense assessment* first isolated the costs known to be different between wet cleaning and dry cleaning, and then quantified the actual expenses incurred at Cypress Plaza Cleaners since switching to professional wet cleaning and what these expenses would have been if the cleaner had purchased a PCE-dry cleaning system.

Conversion Costs

In April 1998, Cypress Plaza Cleaners purchased a Unimac wet clean washer and dryer for \$15,000 including installation and removal of the old Val-Clean dry clean machine. Following installation, the cleaner received an intensive two-day training from a private wet clean consultant which cost \$1,500. No customers' garments were cleaned during this two day training period but the cleaner did remain open creating a small backlog of garments to clean after the training period was completed. Three months after converting the cleaning system, Cypress Plaza Cleaners purchased a tensioning form finisher for \$8,000, including installation.

Revenue

Before switching from dry cleaning to wet cleaning, Cypress Plaza Cleaners cleaned an average of one hundred garments per day, six days a week. Since switching, the owner has reported both a 2-3% loss in older customers and a 2-3% gain in new customers. The owner states that he is now cleaning the same volume of garments now as before he switched – approximately one hundred garment a day. In addition, Cypress Plaza Cleaners has not changed their pricing structure since converting from dry cleaning to

wet cleaning. Based on an average price of \$3.75 per garment, the average revenue at the cleaner before and after the switch to wet cleaning amounts to \$10,000 per month.

Table 6: Revenue Generated per Month at Cypress Plaza Cleaners

Cypress Plaza Cleaners	Date	Revenue
Dry Cleaning	< April 1998	\$10,000
Wet Cleaning	> April 1998	\$10,000

Process Dependent Expenses

The expenses that are known to be different when operating dry clean equipment and wet clean equipment (i.e. process dependent costs) are displayed in Table 7.

Table 7: Process Dependent Expenses Per Month at Cypress Plaza Cleaners Operating a PCE-Dry Clean Equipment and Wet Clean Equipment

	Dry Clean	Wet Clean
<i>Variable Expenses</i>		
Pressing ¹	\$1,394	\$1,609
Solvent - PCE ²	\$35	\$0
Detergent ³	\$109	\$150
Water ⁴	\$20	\$35
Electricity ⁵	\$197	\$150
Gas ⁶	\$286	\$350
Filter cost ⁷	\$31	\$0
Hazardous waste disposal ⁸	\$55	\$0
<i>Fixed Expenses</i>		
Machine maintenance ⁹	\$88	\$32
Regulatory fees	\$73	\$0
Compliance expenses ¹⁰	\$97	\$0
Cleaning system ¹¹	\$365	\$89
Pressing equipment ¹²	\$0	\$44
TOTAL	\$2,750	\$2,459

¹ Before: (6.5 hrs/day)(\$8.25/hr) (26 days/month); After: (8.5 hrs/day) (\$8.25/hr) (26 days/month).

² PCE cost was estimated at \$0.0136/garment (PPERC study, Appendix 4-F).

³ Detergent cost for dry cleaning was estimated at \$0.042/garment (PPERC study, Appendix 4-F).

⁴ Water use was estimated to be 43.7% lower in dry cleaning vs. wet cleaning (PPERC, p.5-8)

⁵ Electricity use was estimated to be 31.2% higher in dry cleaning vs. wet cleaning (PPERC, p.5-18).

⁶ Gas used was estimated to be 18.4% lower in dry cleaning vs. wet cleaning (PPERC p.5-18).

⁷ Filter costs were estimated at \$0.012/pound (PPERC, Appendix 4-F).

⁸ Hazardous waste disposal costs were estimated at \$0.0212/garment (PPERC, Appendix 4-F).

⁹ Estimated to be 0.8825% of total revenue for PCE-Dry Cleaning and \$379/year for wet cleaning (PPERC, Appendix 4-F).

¹⁰ Estimated to be 2.25% of revenue – including regulatory fees and disposal costs (PPERC, Appendix Dry cleaners are 4-F). Based on a monthly revenue of \$10,000 total regulatory compliance comes to \$225 or \$42 minus disposal costs and regulatory fees.

¹¹ Wet clean system costs \$15,000 or \$89/month assuming a fifteen year life span. A comparably-sized PCE-dry cleaning machine was estimated to cost \$43,813 (PPERC, p. 4-16) or \$365/month assuming a ten year life span. (Both costs include a \$3,000 installation fee).

¹² A tensioning form finisher cost \$8,000 -- \$44/month assuming a fifteen year life span.

Total Process-Dependent Expenses

After switch to wet cleaning, the total monthly process-dependent expenses at Cypress Plaza Cleaners to clean 2,600 garments came to \$2,459. (See Table 7) If the cleaner had decided to purchase PCE-dry clean equipment, the monthly process-dependent expenses to clean the same number of garments would have been \$2,750 – 11.8% higher than operating wet clean equipment. Since the only other expenses at the cleaners were not affected by the type of cleaning equipment used (i.e. process-independent), such as rent, the total expenses in using wet clean equipment were less than if dry clean equipment was used. Thus, overall profitability at the cleaner (i.e. the difference between revenue generated and expenses incurred) was greater in wet cleaning than in PCE-dry cleaning.

Table 7 reveals that while total process-dependent expenses were less in wet cleaning, some specific process-dependent expenses were greater in wet cleaning and others were greater in dry cleaning. These are discussed below.

Expenses Greater in Wet Cleaning

Pressing: Since switching from dry cleaning to wet cleaning, Cypress Plaza Cleaners has found it takes longer to press customer garments and has needed to increase the number of hours its presser works from 6 ½ hours per day to 7 ½ hours per day to press 100 garments – an increase of 15.4%. During the first six months after switching, the wet cleaner needed to hire an additional part-time presser, increasing the hours its pressers worked to 8 ½ hours per day. Yet, the wet cleaner has been able to eliminate the need for the part-time presser by increasing its pressing efficiency. Pressing efficiency increased after the cleaner purchased specialized pressing equipment for jackets (a tensioning form finisher) and after hiring a new presser with experience pressing wet cleaned garments.

Detergent: Since switching to wet cleaning, monthly detergent costs at Cypress Plaza Cleaners comes to \$150 to clean 2,600 garments. PCE-Dry cleaning uses less detergent per garment resulting in a cost of only \$109 to clean the same number of garments.

Water: While dry cleaning and wet cleaning use water to both clean and finish garments, wet cleaning uses more water since it is used as the cleaning solvent. After switching to wet cleaning, the water bill at Cypress Plaza Cleaners came to \$35 per month compared to \$20 if PCE-based dry cleaning was used as the cleaning system. While operating the Val-Clean dry clean system, Cypress Plaza Cleaners spent \$20 per month for water.

Natural Gas: Wet cleaning uses more natural gas than PCE-dry cleaning due to the fact more time is needed to dry and press wet cleaned garments. Since switching to wet