



*Matthew Rodriguez*  
Secretary for  
Environmental Protection

## Department of Toxic Substances Control

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*Edmund G. Brown Jr.*  
Governor

September 6, 2011

Mr. Donald S. Clark, Secretary  
Federal Trade Commission  
Room H-113 (Annex A)  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

CARE LABELING RULE, 16 CFR PART 423, PROJECT NO. R511915

Dear Secretary Clark:

The purpose of this letter is to express the support of the California Department of Toxic Substances Control (DTSC) for the Federal Trade Commission's consideration of requirements for manufacturers and importers of garments to provide consumers with a professional wet cleaning label under the Care Labeling of Textile Wearing Apparel and Certain Piece Goods under Code of Federal Regulations, 16 C.F.R. Part 423. DTSC believes that providing labeling of this type is a vital step towards educating the public and dry cleaning industry that professional wet cleaning is a viable and available alternative in many instances to traditional dry cleaning.

Perchloroethylene is not only an identified toxic air contaminant and potential human carcinogen; its use has led to significant releases in many communities which has impacted groundwater and drinking water sources. These impacts have created substantial costs to those communities to remove perchloroethylene from drinking water supplies and to eliminate exposures to perchloroethylene in indoor air. DTSC is overseeing the cleanup of many sites that have been impacted by releases of perchloroethylene.

California has long recognized the concerns posed by the chemical perchloroethylene, and has also recognized that the best way to reduce the risks and hazards it poses is to eliminate its use. A number of California agencies have taken steps to eliminate perchloroethylene use in dry cleaning operations. DTSC, through its Pollution Prevention Program and through its partnerships with local governments in its Green Business Program, has also been working with the dry cleaning industry to encourage the development and implementation of products and processes that reduce or eliminate the use of perchloroethylene.

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DTSC strongly believes that continued education and outreach are needed, and cannot overstate the importance of reinforcing public health and environmental protection goal in a variety of ways, including the product labeling requirements such as the Federal Trade Commission is considering. DTSC believes this will raise consumer awareness and assist in efforts to promote pollution prevention. As consumers and the garment cleaning industry are offered more alternatives to dry cleaning with perchloroethylene, garment cleaning facilities will less likely be sources of soil and groundwater contamination.

Thank you for this opportunity to comment. Should you have any questions, please feel free to contact me at (916) 322-0504, or Ms. Trina Gonzalez, Deputy Director of the Office of Pollution Prevention and Green Technology at (916) 327-8572.

Sincerely,

Deborah Raphael  
Director

cc: Ms. Trina Gonzalez  
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