Adco Cleaning Products

August 18, 2010

RE: 2008 Consumer and Commercial Products Survey, Table 1 – Reported Products

Dear Sir or Madam:

This letter is to communicate some concerns with the list of reported products for the 2008 Consumer and Commercial Products Survey of Spot Removers used on dry clean only garments, as well as the proposed VOC limit for this category.

The following list contains the products which we do not believe adhere to the definition of Dry Clean Only Spot Removers.

Aquadol Neutral Lubricant
L.P.S. Laundry Pre-Spotter
PROTEEN Protein Stain Remover
SPOL All Purpose Wet/Dry Spotter
SPOT-BUSTER All Purpose Spotter
TRIK Tannin Stain Remover
Para-Tann
Aquasolv
Devour
General Formula No. 209
Hydrocare Universal Pre-Treatment
Mulsolite
Odorex
Ready Strip
StreePro
StreeTan

These products (and possibly others) should be removed from your analysis, as they are being used to determine the feasibility of further reducing volatile organic compound emissions from this category of chemicals. These products are water-based and are not designed to be used solely on dry clean only fabrics. These water-based spot removers can not be used in the dry cleaning system. To be used as part of the dry cleaning process, they are applied to a water-soluble stain on the garment, at the spotting board, flushed out of the fabric, and dried before being dry cleaned. Most of these products fit the definition of the normal Spot Remover category. A couple of them fit better into the Laundry Prewash category.

If the products listed above were used in your analysis, then please note that removing their data from the analysis will significantly affect the results you are generating. The percent range of VOCs in the products will narrow and the average will be much higher.

It is important to note that the proposed VOC limit on the Dry Clean Only Spot Remover category will impose significant hardships, not only on the product manufacturers, but also on the dry cleaners themselves. These products are designed to remove certain types of stains. In order to remove these stains, higher concentrations of certain

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chemicals, which are classified as VOCs, must be used. The products are not water-based since they are used to remove non-water-soluble stains. With a limit on the VOCs in this type of product, the dry cleaners will find themselves unable to clean garments effectively and ultimately, satisfy their customers.

In our opinion, applying a VOC limit to the Dry Clean Only Spot Remover category would eliminate the ability to produce effective products to remove stains in the dry cleaning process. It is also our opinion that the Dry Clean Only Spot Remover category should be either a "stand-alone" category or a sub-category of Dry Cleaning Fluid.

We would welcome the opportunity to discuss this matter further with either yourself or your technical staff, in order for both parties to come to a better understanding of this matter.

Sincerely,

Julie D. Hirner

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