

January 20, 2007

Dear Dr. Sawyer and Board Members,

My name is Lynnette Watterson. I am the Immediate Past President of the California Cleaner's Association, and I own Crystal Cleaning Center in San Mateo, a single-location perc dry cleaning plant founded by my mother, Violet Janks, 44 years ago. We currently have eight employees who represent a cumulative time of service of 88 years, including my 20 years. My mother passed away almost two years ago at the age of 87, and one of our former employees who worked for us for 36 years, will soon turn 85. Over the years, several of our employees have had children, all healthy and thriving.

I regularly participate in the work group meetings of the Bay Area Air Quality Management District and attended the Rule 1421 hearings at South Coast. I have participated in and followed the years-long process regarding changes to the ATCM regarding the destiny of perc. When I attended the hearing in Sacramento last May 25th, I was both surprised and disappointed that this body chose to override the recommendations of Staff.

Staff's recommendations were arrived at after reviewing the many facets of a complex situation, not the least of which was the economic impact on a predominantly "mom n' pop" industry. Their recommendations were well thought out and sensible.

I think a recommendation to completely phase out Perc is ill-advised for several reasons. First of all, this industry should be lauded for drastically reducing the consumption of perc by creating more effective equipment. From reading about the pros and cons of alternative solvents, it does not appear that there is a perfect substitute, whether because of VOC's, bacteria formation, cleaning efficacy or cost. Wet Cleaning is certainly not a new technology and is an adjunct to any dry cleaning operation. And now we are hearing about the possible scrutiny of waste water effluent from wet cleaning. No method is exempt!

Regardless of what method is used, there is still the very important element of the skill and diligence of the technician/owner. Regardless of the method being used, or the regulations in place, the variables in skill and housekeeping from plant to plant can't be ignored. A more important area to focus on, rather than banning perc, is to be sure of compliance with existing regulations.

It appears there has not been a thorough enough evaluation of the Nordic Study results which would appear crucial in the decision-making process.

It is my hope and strong recommendation that you do not seal the fate of Perc by banning it completely. A permanent ban on Perc is extreme because there is no perfect substitute as alternatives are studied. The efficiency of a 5th generation machine and mandating appropriate housekeeping practices while still allowing the use of Perc as recommended by Staff last year, appears to make the most sense. Inasmuch as there appears to be no utopian solvent or method, please allow us to make the choice that is right for our industry, our environment, the proper care of our customers' clothes and the survival of many small businesses throughout our State.

Sincerely,

Lynnette Watterson
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Immediate Past President, CCA