

June 22, 2010

Via U.S. Mail

Lisa P. Jackson, Administrator
U.S. Environmental Protection Agency
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Mail Code: 1101A
Washington, D.C. 20460

**Re: Commitment to Phase Out Use of Industrial Laundry
Detergents Containing Nonylphenol Ethoxylates ("NPE") –
Textile Rental Services Association of America**

Dear Administrator Jackson:

The Textile Rental Services Association of America ("TRSA") is pleased to provide the U.S. Environmental Protection Agency ("EPA") with a commitment to phase out the use of industrial laundry detergents containing nonylphenol ethoxylates ("NPE"). This new commitment builds on an existing voluntary phase-out of NPE in laundry detergents reflected in TRSA's participation in EPA's Safer Detergent Stewardship Initiative ("SDSI"). This letter provides additional background on TRSA and its NPE stewardship efforts to date, as well details regarding how the NPE phase out commitment will be administered and tracked.

I. CURRENT TRSA STEWARDSHIP EFFORTS

TRSA is the primary trade association for the industrial laundry industry, representing approximately 98% of industrial laundry facilities in the United States, including all major industrial laundry companies.¹ Over the past several years, TRSA has worked with the Office of Pollution and Prevention and Toxics ("OPPT") and come to an agreement to formalize the phase out of laundry detergents containing NPE.² This agreement reflects TRSA's long-standing commitment to the use of environmentally-friendly washroom chemicals and the health and safety of its workers.

¹ Industrial laundries that are not TRSA members are comprised of very small business operations.

² Please note that TRSA has provided ample documentation to OPPT explaining how laundry workers have minimal opportunity for exposure to NPE due to the highly automated laundering process at most operations, and no laundry worker has ever been identified as suffering adverse health effects related to NPE.

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Towards this end, the industry established the Laundry Environmental Stewardship Program ("LaundryESP") in 1999 in cooperation with the EPA Office of Water.³ This voluntary program was the result of negotiations between the industry and the Agency, and was based on the industry's contention that greater environmental improvement could be accomplished under the program than could be achieved through instituting proposed Effluent Limitation Guidelines ("ELGs") for the industry sector.

As part of the LaundryESP effort to promote the use of more environmentally friendly wash chemicals, TRSA and its members embarked on an aggressive effort to "virtually eliminate" the use of detergents containing NPE by 2015. The goal is embodied in TRSA's agreement to join the EPA's SDSI program. This voluntary NPE-reduction effort was envisioned as a multi-year program. Existing data from 1997-2002 was to be used as a baseline, and formal launch of the effort was to have started in 2009 with the goal of "virtual elimination" by 2015. Progress was to be measured periodically through LaundryESP data-collection surveys and reported to members, EPA, and the public.

As we have related in discussions with OPPT, early engagement of the industry's chemical suppliers already has resulted in dramatic progress in reducing NPE usage in detergent formulations. Over the last five years NPE usage has declined by approximately 75 percent. That trend is accelerating, and our most recent data show that only about 34% of liquid detergent sales contain NPE (and 41% of powder detergent sales).

This progress has been achieved thanks to an aggressive effort by chemical suppliers to reformulate the dozens of detergent products used by the industry. Detergent formulations are tailored specifically for use in laundering different textiles and soiling agents. For that reason there is no "single solution" to replacing NPE. To date, the focus has been primarily on reformulating the most commonly used detergents. While significant strides have been made, additional time is needed to reformulate the numerous other detergent formulations, including both liquid and powder products.

While further reformulation is needed, TRSA has received commitments from the industry that a mandatory phase out of NPE, as described below, is possible over the next several years. That commitment includes a recognition that additional time is necessary to reformulate powder products that are almost exclusively used by small laundry businesses that lack the economies of scale to invest in the automated liquid injection systems used in most large industrial laundry facilities. TRSA also makes this commitment subject to the understanding that the phase out of NPE-based detergents renders moot the need for EPA to pursue air monitoring for, or other regulation of, NPE at industrial laundries.

³ For additional details, see www.LaundryESP.com.

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II. NPE PHASE OUT COMMITMENT

TRSA and its member companies commit to phasing out the use of detergents that contain NPE according to the following schedule:

December 31, 2013: all liquid detergent formulations

December 31, 2014: all powder detergent formulations

TRSA will provide a report to EPA tracking the progress of the phase out by December 31, 2011 and again by December 31, 2012.

To memorialize the industry's commitment, TRSA's Board recently voted and agreed to commit the association and its members to full support of the phase out. TRSA will continue to educate and regularly communicate to its members regarding the obligations to phase out NPE-based detergents. TRSA will post a public statement regarding the phase out commitment on its website.

Further, TRSA and its members understand that EPA likely will pursue a test rule and significant new use rule ("SNUR") that would compel companies that continue to use NPE-based detergents to provide extensive health effect and exposure data to the agency. This would provide a significant deterrence to the use of NPE-based detergents by industrial laundries.

* * * *

TRSA is pleased to continue working with EPA and formalize its commitment to the phase out of the use of NPE-based laundry detergents. We have a strong track record already in this regard, as evidenced by the rapid success of the initial voluntary phase out effort. TRSA greatly appreciates the efforts of OPPT management and staff in taking the time to understand the industry and the feasibility of our NPE phase out efforts. Please let us know if you have any questions or need further information.

Respectfully submitted,



Charles B. Sewell
Vice President – Governmental Affairs
Textile Rental Services Association of America

cc: Jim Willis, Director, OPPT Chemical Control Division (willis.jim@epa.gov)
Ward Penberthy, Deputy Director, OPPT/CCD (penberthy.ward@epa.gov)