



**Lowell Center** for Sustainable Production

UNIVERSITY OF MASSACHUSETTS LOWELL

# Alternatives Assessment 103: Case Examples and Lessons Learned



**APRIL 24, 2012**

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**LOWELL CENTER FOR SUSTAINABLE PRODUCTION,  
UMASS LOWELL**

*\* If you would like to ask a question or comment during this webinar please type your question in the question box located in the control panel.*

# Goals



Lowell Center for Sustainable Production  
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- Continued education and dialog
- *“To advance the practice of alternatives assessment for informed substitution across federal, state, and local agencies through networking, sharing of experiences, development of common approaches, tools, datasets and frameworks, and creation of a community of practice.”*

# Purpose of this call



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- Numerous federal and state-based alternatives assessment efforts
- Some focus on identifying alternatives to chemicals of concern; some focus on evaluating alternatives to functional uses of those chemicals; some focus on evaluation and application in a particular sector
- Various approaches have been undertaken in completing alternatives assessment for chemicals of concern
- Goal: To understand how alternatives assessment is being applied in three case examples, both at a comparative chemical hazard level and in testing alternatives to a chemical of concern. To understand what tools and approaches are being applied.

# Speakers



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- Cal Baier-Anderson, USEPA, Design for Environment
- Alex Stone, Washington Department of Ecology
- Pam Eliason, MA Toxics Use Reduction Institute



# Webinar Discussion Instructions



- Due to the number of participants on the Webinar, all lines will be muted.
- If you wish to ask a question, please type your question in the question box located on the right side panel of your webinar control panel.

# Design for the Environment

Alternatives to BPA in Thermal Paper  
Partnership

Cal Baier-Anderson

# Alternatives Assessment Program



- DfE Chemical alternatives assessments:
  - Identify and evaluate potentially safer alternatives
  - Involve stakeholders from across the spectrum of interested parties
- The outcome of an alternatives assessment:
  - Provides the best information on hazard from literature and models (Based on New Chemicals Program approaches)
  - Helps stakeholders choose safer alternatives
    - Provides information that manufacturers can use to create more sustainable products
    - Helps [minimize the potential for unintended consequences](#) by reducing the likelihood of moving to alternatives that could pose a concern

# DfE Alternatives Assessments for Priority Chemicals



- Tetrabromobisphenol A (TBBPA) in Printed Circuit Boards
  - combustion testing underway
- Nonylphenol and nonylphenol ethoxylates (NP/NPE)
  - final report Spring 2012
- Bisphenol A (BPA) in Thermal Paper
  - draft report Spring 2012
- Flame Retardant Alternatives to decabromodiphenyl ether (decaBDE) used in many plastics
  - draft report Spring 2012
- Flame Retardant Alternatives to hexabromocyclododecane (HBCD) in insulation board
  - draft report Summer 2012
- Phthalates
  - list of potential alternatives Summer 2012





## Human Health Toxicity

- Acute mammalian toxicity
- Carcinogenicity
- Mutagenicity/  
Genotoxicity
- Reproductive Toxicity
- Developmental Toxicity
- Neurotoxicity
- Repeated Dose Toxicity
- Respiratory Sensitization
- Skin Sensitization
- Eye and Skin Irritation/Corrosivity
- Endocrine Activity

## Environmental Fate & Effects

- Aquatic toxicity
- Environmental persistence
- Bioaccumulation

## Additional Endpoints

- Physical hazards
- Ecotoxicity (birds, bees)
- And more

# BPA Alternatives in Thermal Paper Partnership



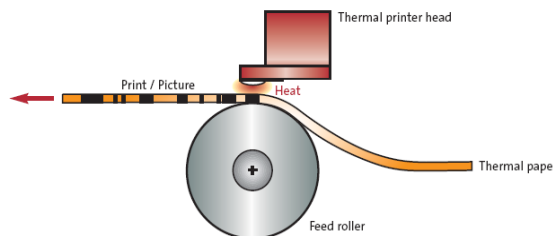
- Why BPA?

- “BPA is a reproductive, developmental, and systemic toxicant in animal studies and is weakly estrogenic, there are questions about its potential impact particularly on children’s health and the environment.”

(see <http://www.epa.gov/opptintr/existingchemicals/pubs/actionplans/bpa.html> )

- Why BPA in thermal paper?

- Unconjugated bisphenol A (BPA) is used in the manufacture of thermal paper
- Some concern for direct human exposure via handling of receipts
- Source of BPA releases into the environment via recycling and landfilling



From Koehler Product Brochure

# Thermal Paper Uses



- Shopping receipts
- Credit card receipts
- ATM & banking receipts
- Ultrasound printouts
- EKG & ECG printouts
- Prescription labels
- Deli labels
- Tickets



<http://www.zimbio.com/pictures/RD7q8nFOyKs/Jessica+Alba+Out+Beverly+Hills/Hndv07-2WS4/Meter+Maid>



<http://www.jpihealthcare.com/ultrasound-paper>



[http://www.mohawkmedicalmall.com/2009\\_11\\_01\\_archive.html](http://www.mohawkmedicalmall.com/2009_11_01_archive.html)

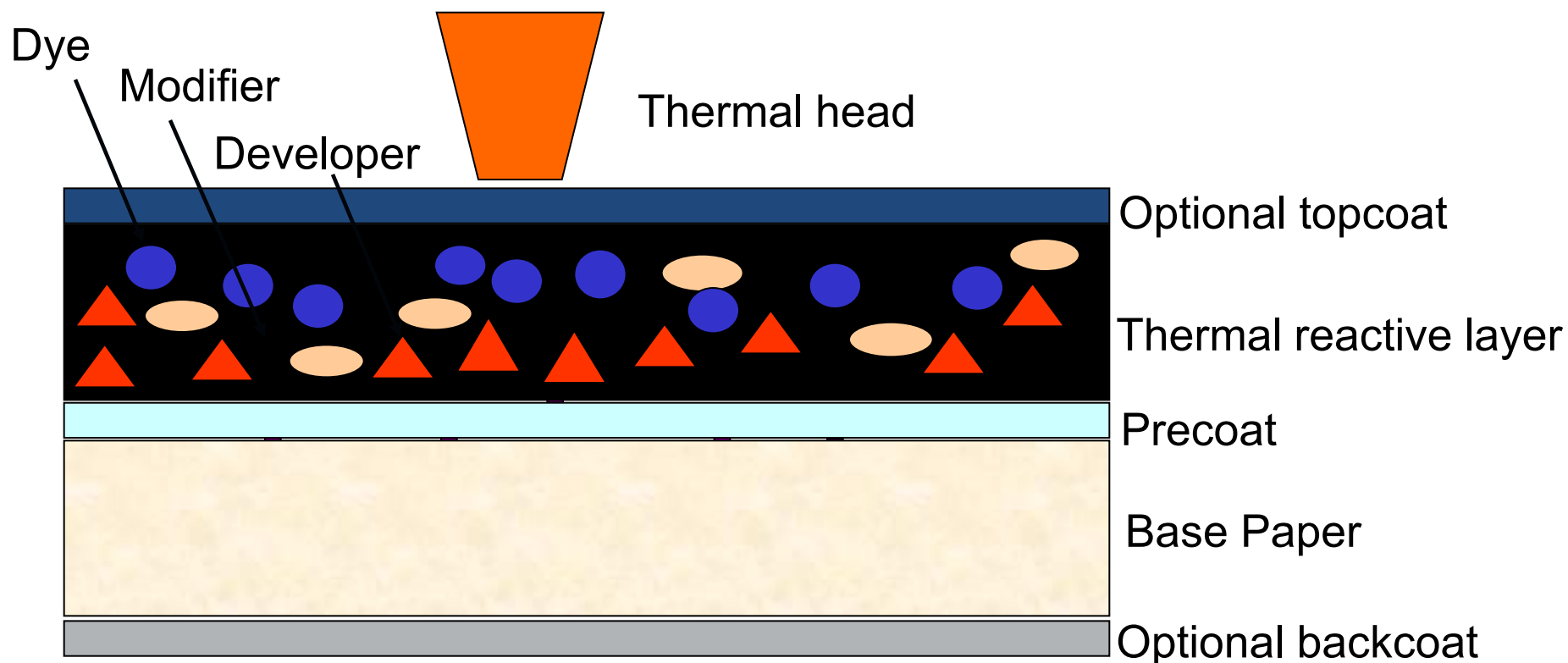


<http://www.nashua.com/ProdAndServices/LabelSupScale.aspx?Selected=LabelTrans>

<http://www.starmicronics.com/printer/Application/Application.aspx?i=11>



# Cross section of thermal paper



Based on Koehler Product Brochure

# Scope



- Approximately 100 partners representing industry, government and NGOs
  - BPA in the news boosts interest
  - ~ 40 are actively involved, representing the supply chain
- Identified 19 alternatives
  - Many alternatives are currently in use
  - External surveys also indicate that ~40-50% receipts made with something other than BPA
- Many alternatives structurally similar to BPA
  - BPA-like, BPS-like and “other”
  - Very little data for most chemicals

**Table 4-1 Screening Level Toxicology Hazard Summary – Structure Group Cross-Check**

This table only contains information regarding the inherent hazards of the chemicals evaluated. Evaluation of risk considers both the hazard and exposure. The caveats listed in the legend and footnote sections must be taken into account when interpreting the hazard information in the table below.

**VL** = Very low hazard **L** = Low hazard **M** = Moderate hazard **H** = High hazard **VH** = Very high hazard — Endpoints in colored text (**VL**, **L**, **M**, **H**, and **VH**) were assigned based on empirical data.

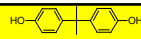
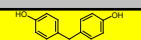
Endpoints in black italics (*VL*, *L*, *M*, *H*, and *VH*) were assigned using values from estimation software and professional judgment [(Quantitative) Structure Activity Relationships “(Q)SAR”].

♦ For representative component, most predominant oligomer, of mixture (MW <1,000).

‡ Based on highest concern oligomer with a MW <1,000

§ Based on analogy to experimental data for a structurally similar compound.

Φ Based on expert judgment

| Chemical                                                                                                                               | CASRN      | Human Health Effects |                 |                |                |                |              |                |                 |                 |                   |                           | Aquatic Toxicity |         | Environmental Fate |                 |
|----------------------------------------------------------------------------------------------------------------------------------------|------------|----------------------|-----------------|----------------|----------------|----------------|--------------|----------------|-----------------|-----------------|-------------------|---------------------------|------------------|---------|--------------------|-----------------|
|                                                                                                                                        |            | Acute Toxicity       | Carcinogenicity | Genotoxicity   | Reproductive   | Developmental  | Neurological | Repeated Dose  | Skin Sensitizer | Eye Irritation  | Dermal Irritation | Respiratory Sensitization | Acute            | Chronic | Persistence        | Bioaccumulation |
|  Bisphenol A 2,2-bis(4-hydroxyphenyl)propane           | 80-05-7    | L                    | M               | L              | H              | H              | M            | M              | M               | M               | M                 |                           | H                | H       | VL                 | L               |
|  Bisphenol F Bis(4-hydroxyphenyl)methane               | 620-92-8   | L                    | M               | L              | H <sup>§</sup> | H <sup>§</sup> | M            | H              | L               | VH              | M <sup>§</sup>    |                           | M                | H       | L                  | L               |
|  Bisphenol C 2,2'-Bis(4-hydroxy-3-methylphenyl)propane | 79-97-0    | L <sup>§</sup>       | M               | M              | H <sup>§</sup> | H <sup>§</sup> | M            | M <sup>§</sup> | M <sup>§</sup>  | VH <sup>§</sup> | M <sup>§</sup>    |                           | H                | H       | M                  | M               |
|  MBHA Methyl bis(4-hydroxyphenyl)acetate               | 5129-00-0  | L <sup>§</sup>       | M               | L <sup>§</sup> | H <sup>§</sup> | H <sup>§</sup> | M            | M <sup>§</sup> | L               | M <sup>§</sup>  | M <sup>§</sup>    |                           | H                | H       | M                  | L               |
|  BisOPP-A 4,4'-Isopropylidenebis(2-phenylphenol)       | 24038-68-4 | L <sup>§</sup>       | M               | L <sup>§</sup> | H <sup>§</sup> | H <sup>§</sup> | M            | M <sup>§</sup> | M <sup>§</sup>  | M <sup>§</sup>  | M <sup>§</sup>    |                           | L                | H       | H                  | M               |
|  Bisphenol AP 4,4'-(1-Phenylethylidene)bisphenol       | 1571-75-1  | L <sup>§</sup>       | M               | L <sup>§</sup> | H <sup>§</sup> | H <sup>§</sup> | M            | M <sup>§</sup> | M <sup>§</sup>  | M <sup>§</sup>  | M <sup>§</sup>    |                           | H                | H       | H                  | M               |
| Substituted phenolic compound, PROPRIETARY #1                                                                                          |            | L <sup>§</sup>       | M               | L              | H <sup>§</sup> | H <sup>§</sup> | M            | M <sup>§</sup> | M <sup>§</sup>  | M <sup>§</sup>  | M <sup>§</sup>    |                           | H                | M       | M                  | L               |
| Substituted phenolic compound, PROPRIETARY #2                                                                                          |            | L <sup>§</sup>       | M               | L <sup>§</sup> | H <sup>§</sup> | H <sup>§</sup> | M            | M <sup>§</sup> | M <sup>§</sup>  | M <sup>§</sup>  | M <sup>§</sup>    |                           | H                | H       | H                  | H               |
|  PHBB Benzyl 4-hydroxybenzoate                       | 94-18-8    | L                    | M               | M              | L <sup>Φ</sup> | M              | M            | L <sup>Φ</sup> | M <sup>§</sup>  | VL              | VL                |                           | H                | H       | L <sup>§</sup>     | L               |

# Hazard Evaluation Results Summary



- Most of the alternatives can be grouped as either BPA-like or BPS-like based on chemical structure.
- Most chemicals have little data. Data gaps are filled based on expert judgment: analogs; structure-activity relationship; and computer models.
- Even the chemicals that are structurally different exhibit **trade-offs**. Stakeholders should consider trade-offs in substitution decision-making.
- Substitution may call for near-term risk mitigation responses. For example, refrain from recycling thermal paper.
- Longer term efforts should include broader sustainability considerations.

# Challenges & Limitations



1. Data gaps
2. Need to refine use of additional “non-traditional” information in characterization
3. Weighing trade-offs
4. Timelines



# For more information:



DfE: <http://www.epa.gov/dfe>

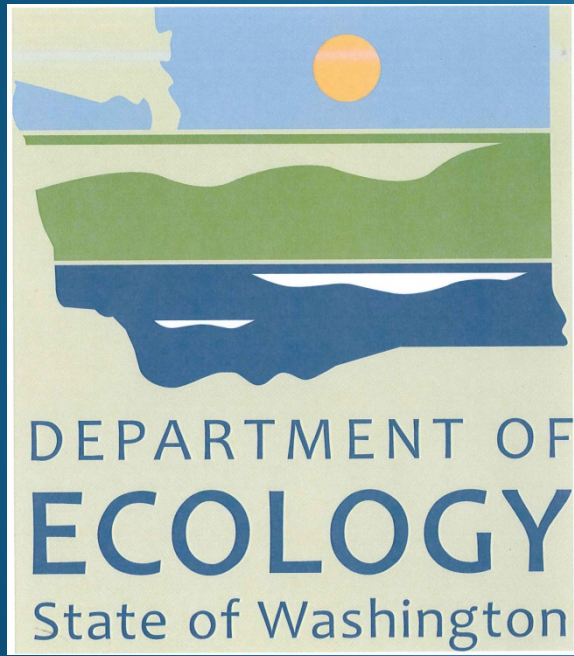
[facebook.com/epadfe](https://facebook.com/epadfe)

Draft report for public comment,  
available this spring:

[baier-anderson.caroline@epa.gov](mailto:baier-anderson.caroline@epa.gov)

<http://www.epa.gov/dfe/pubs/projects/bpa/index.htm>

# Flame Retardant Alternatives to Decabromodiphenyl ether



Alex Stone, Sc. D.  
Washington State Department  
of Ecology

24 April 2012

# WA Legislation

- PBDE Chemical Action Plan issued in 2006
- Ban legislation passed and signed into law in 2007
  - Banned the use of Penta- and Octa-BDE mixtures
  - Banned the use of Deca-BDE in mattresses
  - Prohibited sale of Deca contained in:
    1. Electronic enclosures of TVs and computers
    2. Residential upholstered furniture
      - IF Fire Safety maintained
      - IF safer and technically feasible alternative(s) identified
- Alternative Assessment report completed Jan. 2009

# **WA Legislation (cont.)**

## **Exemptions in WA:**

- **Transportation, aviation, military and space applications, etc. exempted**
- **Established limit of  $< 0.1\%$  (1,000 ppm) for reporting and/or new products containing recycled material, carpet pads for example**
- **Gave authority to adopt rules for implementation including compliance and enforcement**

# Deca Alternatives Assessment

- **Built upon work done in PBDE Chemical Action Plan & subsequent work around the world**
- **Evaluated Current Deca Assessments**
  - What products/plastics included
  - What criteria used to evaluate alternatives
  - What alternatives evaluated
  - Conclusions
  - Strengths/weaknesses

# **‘Safer’ Considerations used in WA Deca Assessment**

## **1. Market and Technical Analysis**

- Do alternatives exist?
- Do they meet the same function?

## **2. Toxicity Evaluation**

- If failed toxicity concerns, no reason to address remaining issues
- Essentially used the process developed by EPA’s Design for the Environment Program as adapted by Clean Production Action’s Green Screen

## **3. Exposure Evaluation**

- Assumed same for Deca and alternatives unless data proved otherwise

# 'Safer' Considerations (cont.)

## 4. Engineering

- Can an alternative be used without changing process?
- Can process be changed to use alternative?
- Are there other viable alternatives (redesign product so chemical is not needed, etc.)

## 5. Availability

- Is it currently being sold for intended application?
- Is it currently being used in similar products?

## 6. Cost

- What impact does switch have upon cost of final product?
- Is it cost prohibitive?

# Final remarks on Deca-BDE

- Our task was to identify if there was at least one viable alternative to Deca. Our report stated we believe there is.
  - Phosphate alternative (RDP) viable as replacement in electronic enclosures
  - Residential upholstered furniture can be manufactured to meet flammability standards without addition of chemical flame retardants
- Ecology does not have the authority to dictate what flame retardant is used in place of Deca.
- If a safer alternative exists, a toxic chemical should be removed from use regardless of exposure potential



# Lessons Learned from Assessment Process

## Positive:

1. Alternative Assessments are feasible
2. Procedures have been developed by TURI, Clean Product Action (the Green Screen), DfE, etc. to assist
3. Methodologies are comprehensive and based upon the most recent science and assessment methodologies

## Negative:

1. Time and resource intensive
2. Requires expertise in chemistry, toxicology, process engineering, etc.
3. Does not look at full life cycle impacts
4. Always a risk that new data will alter conclusions

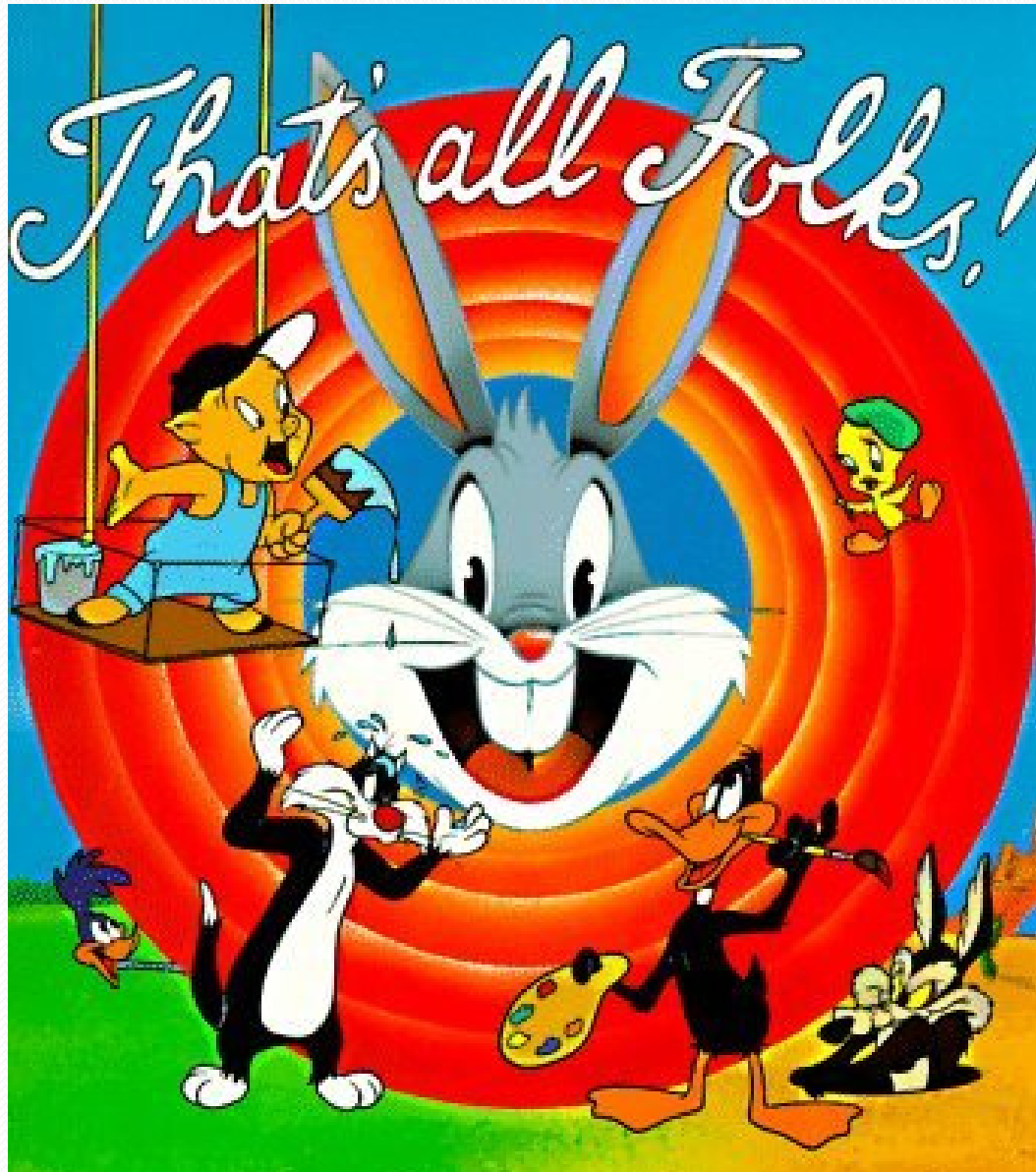
# Current WA Alternative Assessment Work

## Technical Alternative Assessment Guidance:

- Eight states working together on an AA guidance document
- Consists of 12 modules, most with several levels of increasing complexity
- Flexible document for a wide range of potential users
- More info available on Ecology website:  
<http://www.ecy.wa.gov/programs/hwtr/ChemAlternatives/index.html>

## QCAT (Quick Chemical Assessment Tool):

- Stripped down version of GreenScreen™ hazard tool
- Version 1.2 (betamax) will be posted soon



# References:

- **Washington State PBDE Chemical Action Plan, 2006:**  
<http://www.ecy.wa.gov/biblio/o5o7o48.html>
- **Washington State Legislation RCW 70.76, 2007: Polybrominated diphenyl ethers — flame retardants** <http://apps.leg.wa.gov/RCW/default.aspx?cite=70.76>
- **Syracuse Research Institute for the WA Departments of Ecology & Health, 2006: Flame Retardant Alternatives,** <http://www.ecy.wa.gov/programs/swfa/pbt/docs/flameRetard.pdf>
- **Maine DEP and Maine CDC, 2007: Brominated Flame Retardants, 3<sup>rd</sup> Annual Report to the Maine Legislature,** <http://mainegov-images.informe.org/dep/rwm/publications/legislativereports/pdf/finalrptjano7.pdf>
- **Maine Legislation Title 38 Section 1609, 2007:**  
[www.mainelegislature.org/legis/statutes/38/title38sec1609.pdf](http://www.mainelegislature.org/legis/statutes/38/title38sec1609.pdf)
- **Illinois EPA, 2007: Report on Alternatives to the Flame Retardant DecaBDE: Evaluation of Toxicity, Availability, Affordability, and Fire Safety Issues,** <http://www.epa.state.il.us/reports/decabde-study/decabde-alternatives.pdf>
- **WA Departments of Ecology & Health, 2008: 'Alternatives to Deca-BDE in Televisions and Computers and Residential Upholstered Furniture',** <http://www.ecy.wa.gov/pubs/o9o7o41.pdf>

# Contact Information

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# Safer Alternatives to Perc

## Massachusetts Assessment of Alternatives for the Professional Garment Care Industry

Pam Eliason

Industry Research Program Manager  
Toxics Use Reduction Institute • UMass Lowell



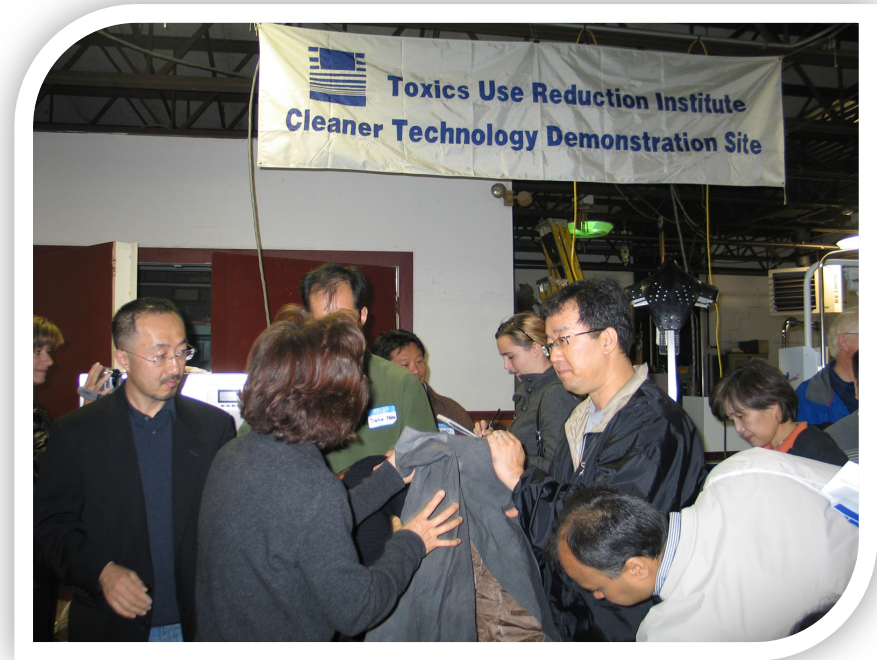
# Presentation Overview

- Our audience
- Drivers for change
- Our approach
- Alternatives studied
- Results
- Promoting adoption of safer alternatives



# Our Audience

- Practitioners
    - Planners
  - Shop Owners
- 
- Perc designated as a higher hazard substance in 2008 – must report/plan if >1000 lb/yr used
  - Shops have increasing pressures to switch





# Our Approach

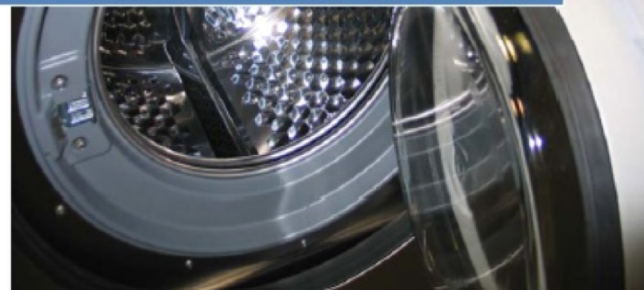
- Balance deep dive with pragmatism
- Focus on key criteria to assist in decisions
  - Technical feasibility
  - Economic feasibility
  - EH&S impacts
- Conduct site visits with users of alternatives
- Review scientific and manufacturer data
- Promote adoption of safer alternatives

# Alternatives Studied

- Wet cleaning
- CO<sub>2</sub>
- High flash point hydrocarbons
- Acetals
- Propylene-glycol ethers
- Volatile methyl siloxanes
- n-Propyl bromide

**2012**

Assessment of Alternatives to  
Perchloroethylene  
for the Professional Garment  
Care Industry



*Methods and Policy  
Report No. 27*

April 2012

**TURI**  
TOXICS USE REDUCTION INSTITUTE  
UMASS LOWELL

UMASS LOWELL

# Key Criteria

## Technical/Performance

- Cycle time and load capacity

- Difficult materials

- Pretreatment and finishing requirements

## Economic

- Equipment costs

- Chemical costs

- Energy costs

# Applicable Regulations

- Hazardous Air Pollutants
- Designated VOCs
- Massachusetts regulations
  - Listed toxics under TURA
  - Environmental Results Program
- Hazardous waste disposal issues
- Wastewater discharge restrictions

# Key EH&S Criteria

- Persistence, Bioaccumulation potential, aquatic Toxicity
- Recommended Exposure Limits
- Central Nervous System Effects
- Carcinogenic, Reproductive or Developmental Toxicant
- Flashpoint

# Are Alternatives Effective and Affordable?

**All** options are technically feasible

Some may have impact on throughput

Some have limitations on the fabrics they can handle

**Most** options are affordable

CO<sub>2</sub>-based options not economically feasible (for majority of smaller MA shops)

# Are the Alternatives Safer than Perc?

All are less persistent, bioaccumulative and toxic in the environment

**Most** are safer ... **EXCEPT ...**

- nPB is carcinogenic, reproductive toxic and neurotoxic – **NOT** a safer alternative
- **Data gaps** present concern for alternatives that are new to the market (e.g., Solvon K4 acetals)

**Most** options combustible or flammable, requiring additional control for safety

**Several** options are VOCs, or result in hazardous waste or wastewater disposal restrictions

# Making the Data Available and Useful

- Fact sheet developed for shop owners and planners
- Table provides data on key criteria
- Full report (still draft) provides comprehensive discussion of feasibility of each option

Summary Table: Comparison of Perc and Seven Garment Cleaning Alternatives

| Key Assessment Criteria              |                                                             | Perc (reference)                    | Wet Cleaning <sup>1</sup>                        | Carbon Dioxide                                   | High Flashpoint Hydrocarbons                                    | Aerated <sup>2</sup>                     | Propylene Glycol ethers        | Solvents                                                         | n-Propyl Bromide                                               |
|--------------------------------------|-------------------------------------------------------------|-------------------------------------|--------------------------------------------------|--------------------------------------------------|-----------------------------------------------------------------|------------------------------------------|--------------------------------|------------------------------------------------------------------|----------------------------------------------------------------|
| Common Trade Names / Manufacturers   |                                                             |                                     | Wascomat Meile Continental HwaSung AquaSolo      | Cool Clean Technologies Solvairst*               | DF2000™ Fluid EcoSolv* ShellSol D60 PureDry Caled Hydrochlorine | Solvon K4                                | Solvax* Rynex 3* Impress*      | Green Earth* DS solvent (provided by Dow Corning, GE, Shin-Etsu) | DrySolv* Fabrisolv™ XL                                         |
| Technical / Performance <sup>3</sup> | Cycle time (min)                                            | 45                                  | 20-40                                            | 35-45                                            | 60-75                                                           | 60-65                                    | >45                            | 53-58                                                            | 45                                                             |
|                                      | Load capacity (lb)                                          | 50                                  | 20-75                                            | 60                                               | 35-90                                                           | 40-90                                    | 43                             | 55                                                               | 50                                                             |
|                                      | Materials system may have difficulty with                   | Leather, suedes, beads, delicates   | Leather, suede and fur                           | Tricetates, specially dyed acetates              | Vinyl appliques                                                 | Appliques or decorations glued to fabric | None identified                | None identified                                                  | Leather, suedes, beads, delicates                              |
|                                      | Spotting requirements                                       | Moderate                            | Low to Moderate                                  | High                                             | Moderate                                                        | Low                                      | Low                            | High                                                             | Low                                                            |
| Financial                            | Equipment                                                   | \$30,000 - \$65,000                 | \$36,000 - \$61,000                              | \$100,000 - \$150,000                            | \$38,000 - \$72,000                                             | \$50,000 - \$100,000                     | \$55,000                       | \$30,500 - \$55,000                                              | \$40,000 - \$60,000                                            |
|                                      | Chemical cost per gallon                                    | \$18 - \$28                         | \$15 (detergent)                                 | \$0.18/lb CO <sub>2</sub> and \$40/gal detergent | \$16                                                            | \$28                                     | \$15                           | \$22-\$28                                                        | \$40-\$64                                                      |
|                                      | Electricity usage (kWhr/100 lb)                             | 26.6                                | 9.3                                              | 30.9                                             | 35.5                                                            | Similar to hydrocarbon                   | Unavailable                    | \$4.2                                                            | Unavailable                                                    |
|                                      | Typical cost per pound cleaned <sup>4</sup>                 | \$1.02                              | \$1.10                                           | \$1.40                                           | \$0.88                                                          | Unavailable                              | \$1.14                         | \$1.71                                                           | Unavailable                                                    |
| Environmental                        | Persistence <sup>5</sup> (water, soil, sediment and/or air) | M (water), H (soil, sed, air)       | L (water, soil, air), M (sed)                    | NA                                               | L (water, soil, air), M (sed)                                   | L (water, soil, air), M (sed)            | L (water, soil, air), M (sed)  | L (water), H (soil), H (sed, air)                                | L (water, soil), M (sed), H (air)                              |
|                                      | Bioaccumulation <sup>6</sup>                                | Low                                 | Low                                              | NA                                               | Moderate                                                        | Low                                      | Low                            | Moderate                                                         | Low                                                            |
|                                      | Aquatic Toxicity <sup>7</sup>                               | Moderate                            | Low to Moderate <sup>8</sup>                     | Low                                              | High                                                            | Moderate <sup>9</sup>                    | Low                            | High                                                             | High                                                           |
| Human Health                         | Recommended Exposure limits                                 | 25 ppm <sup>10</sup>                | NE                                               | 5000 ppm                                         | 171 ppm                                                         | NE                                       | NE                             | 10 ppm                                                           | 10 ppm                                                         |
|                                      | Central Nervous System Effects                              | Yes                                 | No <sup>11</sup>                                 | No <sup>12</sup>                                 | Yes                                                             | No data available                        | Yes                            | Some Evidence                                                    | Yes                                                            |
|                                      | Carcinogenicity                                             | Probable human carcinogen           | Not classified by IARC                           | Not classified by IARC                           | Not classified by IARC                                          | Not classified by IARC                   | Not classified by IARC         | Some evidence                                                    | Clear evidence in animal studies by NTP                        |
| Physical / Safety                    | Reproductive / Developmental Toxicity                       | Yes                                 | Negligible <sup>13</sup>                         | No data available                                | No data available                                               | No data available                        | No <sup>14</sup>               | Studies indicate concern                                         | Yes                                                            |
|                                      | Flash Point/ Flammability                                   | NA / Not Flammable                  | NA / Not Flammable                               | NA / Not Flammable                               | 142°F / Combustible liquid                                      | 144°F / Combustible liquid               | 160-212°F / Combustible liquid | 171°F / Combustible liquid                                       | NA or 72°F / Flammable, depending on test method <sup>15</sup> |
| Applicable Regulations               | Clean Air Act Hazardous Air Pollutant (HAP)                 | Yes, HAP                            | No                                               | No                                               | No                                                              | No                                       | No                             | No                                                               | No                                                             |
|                                      | Clean Air Act designated VOC                                | No, Exempt <sup>16</sup>            | No <sup>17</sup>                                 | No                                               | VOC                                                             | VOC                                      | VOC                            | No, Exempt <sup>18</sup>                                         | VOC                                                            |
|                                      | Massachusetts regulated (TURA, ERP)                         | TURA (Higher Hazard Substance), ERP | No                                               | No                                               | No                                                              | No                                       | No                             | No                                                               | TURA                                                           |
|                                      | Hazardous waste disposal required                           | Yes - Listed hazardous waste        | No                                               | No                                               | Yes - Waste Oil - Hazardous Waste in MA                         | No                                       | No                             | No                                                               | No; monitor for residual perc if used in retrofitted machine   |
|                                      | Wastewater discharge restrictions                           | No                                  | Discharge to sewer or holding tank <sup>19</sup> | No                                               | No                                                              | No                                       | No                             | No                                                               | No                                                             |

NA = Not applicable; NE = Not established



Summary Table: Comparison of Perc and Seven Garment Cleaning Alternatives

| Key Assessment Criteria                 |                                                 | Perc<br>(reference)                     | Wet Cleaning <sup>1</sup>                               | Carbon<br>Dioxide                                      | High<br>Flashpoint<br>Hydrocarbons                                       | Acetals <sup>2</sup>                           | Propylene<br>Glycol Ethers       | Siloxanes                                                                    | n Propyl<br>Bromide                  |
|-----------------------------------------|-------------------------------------------------|-----------------------------------------|---------------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------|----------------------------------|------------------------------------------------------------------------------|--------------------------------------|
| Common Trade Names /<br>Manufacturers   |                                                 |                                         | Wascomat<br>Meile<br>Continental<br>HwaSung<br>AquaSolo | Cool Clean<br>Technologies<br>Solvair®                 | DF2000™ Fluid<br>EcoSolv®<br>ShellSol D60<br>PureDry<br>Caled Hydroclene | Solvon K4                                      | Solvair®<br>Rynex 3®<br>Impress® | Green Earth®<br>D5 solvent<br>(provided by<br>Dow Corning,<br>GE, Shin-Etsu) | Drysolv®<br>Fabrisolv™ XL            |
| Technical /<br>Performance <sup>3</sup> | Cycle time (min)                                | 45                                      | 20-40                                                   | 35-45                                                  | 60-75                                                                    | 60-65                                          | >45                              | 53-58                                                                        | 45                                   |
|                                         | Load capacity (lb)                              | 50                                      | 20-75                                                   | 60                                                     | 35-90                                                                    | 40-90                                          | 43                               | 55                                                                           | 50                                   |
|                                         | Materials system<br>may have<br>difficulty with | Leather,<br>suedes, beads,<br>delicates | Leather, suede<br>and fur                               | Triacetates,<br>specially dyed<br>acetates             | Vinyl appliqués                                                          | Appliqués or<br>decorations<br>glued to fabric | None<br>identified               | None<br>identified                                                           | Leather, suedes,<br>beads, delicates |
|                                         | Spotting<br>requirements                        | Moderate                                | Low to<br>Moderate                                      | High                                                   | Moderate                                                                 | Low                                            | Low                              | High                                                                         | Low                                  |
| Financial                               | Equipment                                       | \$30,000 -<br>\$65,000                  | \$36,000 -<br>\$61,000                                  | \$100,000 -<br>\$150,000                               | \$38,000 -<br>\$72,000                                                   | \$50,000 -<br>\$100,000                        | \$56,000                         | \$30,500 -<br>\$55,000                                                       | \$40,000 -<br>\$60,000               |
|                                         | Chemical cost per<br>gallon                     | \$18 - \$28                             | \$15<br>(detergent)                                     | \$0.18/lb CO <sub>2</sub><br>and \$40/gal<br>detergent | \$16                                                                     | \$28                                           | \$15                             | \$22-\$28                                                                    | \$40-\$64                            |
|                                         | Electricity usage<br>(kWhr/100 lb)              | 26.6                                    | 9.3                                                     | 30.9                                                   | 35.5                                                                     | Similar to<br>hydrocarbon                      | Unavailable                      | 54.2                                                                         | Unavailable                          |
|                                         | Typical cost per<br>pound cleaned <sup>4</sup>  | \$1.02                                  | \$1.10                                                  | \$1.40                                                 | \$0.88                                                                   | Unavailable                                    | \$1.14                           | \$1.71                                                                       | Unavailable                          |

Summary Table: Comparison of Perc and Seven Garment Cleaning Alternatives

| Key Assessment Criteria |                                                                      | Perc<br>(reference)                 | Wet Cleaning <sup>1</sup>           | Carbon<br>Dioxide         | High<br>Flashpoint<br>Hydrocarbons  | Acetals <sup>2</sup>                | Propylene<br>Glycol Ethers           | Siloxanes                               | n Propyl<br>Bromide                                                     |
|-------------------------|----------------------------------------------------------------------|-------------------------------------|-------------------------------------|---------------------------|-------------------------------------|-------------------------------------|--------------------------------------|-----------------------------------------|-------------------------------------------------------------------------|
| Environmental           | Persistence <sup>5</sup><br>(water, soil,<br>sediment and/or<br>air) | M (water),<br>H (soil, sed,<br>air) | L (water, soil,<br>air),<br>M (sed) | NA                        | L (water, soil,<br>air),<br>M (sed) | L (water, soil,<br>air),<br>M (sed) | L (water, soil,<br>air),<br>M (sed)  | L (water),<br>M (soil),<br>H (sed, air) | L (water, soil),<br>M (sed),<br>H (air)                                 |
|                         | Bioaccumulation <sup>6</sup>                                         | Low                                 | Low                                 | NA                        | Moderate                            | Low                                 | Low                                  | Moderate                                | Low                                                                     |
|                         | Aquatic Toxicity <sup>7</sup>                                        | Moderate                            | Low to<br>Moderate <sup>8</sup>     | Low                       | High                                | Moderate <sup>9</sup>               | Low                                  | High                                    | High                                                                    |
| Human Health            | Recommended<br>Exposure limits                                       | 25 ppm <sup>10</sup>                | NE                                  | 5000 ppm                  | 171 ppm                             | NE                                  | NE                                   | 10 ppm                                  | 10 ppm                                                                  |
|                         | Central Nervous<br>System Effects                                    | Yes                                 | No <sup>11</sup>                    | No <sup>12</sup>          | Yes                                 | No data<br>available                | Yes                                  | Some<br>Evidence                        | Yes                                                                     |
|                         | Carcinogenicity                                                      | Probable<br>human<br>carcinogen     | Not classified<br>by IARC           | Not classified<br>by IARC | Not classified by<br>IARC           | Not classified<br>by IARC           | Not classified<br>by IARC            | Some<br>evidence                        | Clear evidence in<br>animal studies by<br>NTP                           |
|                         | Reproductive /<br>Developmental<br>Toxicity                          | Yes                                 | Negligible <sup>13</sup>            | No data<br>available      | No data available                   | No data<br>available                | No <sup>14</sup>                     | Studies<br>indicate<br>concern          | Yes                                                                     |
| Physical /<br>Safety    | Flash Point/<br>Flammability                                         | NA /<br>Not<br>Flammable            | NA /<br>Not<br>Flammable            | NA /<br>Not Flammable     | 142°F /<br>Combustible<br>liquid    | 144°F /<br>Combustible<br>liquid    | 160-212°F /<br>Combustible<br>liquid | 171°F /<br>Combustible<br>liquid        | NA or 72°F /<br>Flammable,<br>depending on<br>test method <sup>15</sup> |

# Promoting the Adoption of Safer Alternatives in Massachusetts

- Fact sheet and assessment **report**
- **Training** on TUR planning for dry cleaners still using perc
- Incentive **grants** to cleaners who switch to dedicated wet cleaning
- **Case studies** highlighting benefits of switching
- Peer **demonstrations** of safer alternatives to address practical questions
- Community training and **outreach**

# Learn more

[http://www.turi.org/Our Work/Business/Small Businesses/Dry Cleaning](http://www.turi.org/Our_Work/Business/Small_Businesses/Dry_Cleaning)

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[www.turi.org](http://www.turi.org)



# Discussion Questions



- How have the concepts and tools of alternatives assessment been applied to date in different agencies for different chemicals of concern?
- What are some of the challenges/issues that came up during the alternatives assessment and how were these addressed
- What are the key lessons from the alternatives assessment effort that could be applicable to other alternatives assessments or help shape future collaborations.

# Next Webinar



**Lowell Center** for Sustainable Production  
UNIVERSITY OF MASSACHUSETTS LOWELL



- Alternatives Assessment 104: Interagency alternatives assessment case example and lessons learned
- TBA early June



# Webinar Audio & Slides



The audio recording and slides shown during this presentation will be available at:

<http://www.ic2saferalternatives.org/page/Logistics+and+Communications>