

United States Senate

WASHINGTON, DC 20510

February 26, 1999

The Honorable Carol M. Browner
Administrator
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Administrator Browner:

This letter is in reference to the Environmental Protection Agency's (EPA/Agency) proposed effluent limitation guidelines for industrial laundries and the notice of data availability issued December 23, 1998. The notice indicates that EPA is considering a "no regulation" option along with a voluntary industry environmental improvement program in lieu of categorical standards for the laundry industry. This issue is of concern to us because, according to Agency estimates, small businesses make up over 90 percent of the industrial laundry industry and would bear most all of the identified impacts of the proposed regulation.

Some alternative to regulation may be appropriate in this case. Based on new data submitted after EPA's original proposal, the benefit to the environment of the proposed rule may be less and the cost of the rule may be greater than had originally been estimated. Additionally, industry has proposed, at the Agency's suggestion, an innovative and flexible alternative approach to the problems the proposed rule seeks to address.

It is our understanding that the Agency might link a "no regulation" decision to the development and implementation of a voluntary industry environmental improvement program. As the Agency recognizes, voluntary, or nonregulatory, programs can be an effective tool for reducing risk and achieving environmental results. At the Agency's suggestion, industry formalized and submitted to the Agency a voluntary environmental stewardship and pollution prevention program. Industry asserts the program would provide a multi-media approach with quantifiable reductions in energy consumption and water and washroom chemical usage. With the entire laundry industry participating in this voluntary program, its benefits would extend beyond those sectors covered by the proposed pretreatment standard.

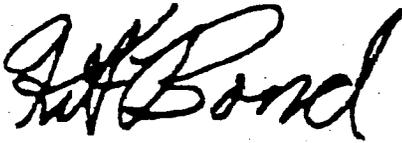
An important test for the voluntary program is how well it protects and improves human health and the environment, and we are sure the Agency will evaluate the proposal thoroughly in this regard.

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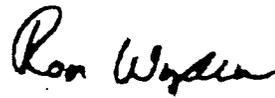
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We encourage the Agency to continue to work with the industry to develop an alternative approach in this area that would protect and improve human health and the environment in a manner that is both flexible and innovative. Please provide us with quarterly updates on this issue. If you have any questions regarding this matter, please have your staff contact Tracy Henke with Senator Bond at 224-5721 or Joshua Sheinkman with Senator Wyden at 224-5244.

Sincerely,



Christopher S. Bond
United States Senator



Ron Wyden
United States Senator