UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 24 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Brigid D. Klein
Vice President & General Counsel
Consumer Speciality Products Associaton
900 17th Street, NW, Suite 300
Washington, DC 20006

Re: Extension request

Dear Ms. Klein:

This letter responds to your letter dated March 13, 2008, requesting additional time for submitting ingredient and other information on air freshener products to the U.S. Environmental Protection Agency (EPA). Your letter requested an additional 60 days in order to provide time for assembling the information from the seven air freshener manufacturers, resolve issues with fragrance manufacturers, handle TSCA confidential business information claims, and provide the quality of information that will be responsive to EPA and satisfy concerns raised by the petitioners. While EPA recognizes that a request for some additional time is reasonable, more than 90 days have already elapsed since EPA's original request. We believe an extension of 45 additional days should be sufficient. The deadline is, accordingly, extended to May 15, 2008.

In addition, your letter paraphrased EPA's views about the potential for certain kinds of information to receive protection as TSCA CBI. To avoid any potential confusion, EPA's Office of General Counsel provided the following summary of EPA's views with respect to the CBI issues discussed at the meeting:

- With respect to the standard for determining whether information that is voluntarily submitted is entitled to protection as confidential business information, courts that apply the Critical Mass doctrine of the D.C. Circuit use a different standard for voluntarily submitted information, one that is easier to meet than the standard for involuntarily submitted information, to determine whether information is entitled to protection from disclosure in response to a FOIA request. EPA's Office of General Counsel follows the D.C. Circuit and it uses the voluntary standard, if applicable, when it issues final confidentiality determinations.

- Some information that is voluntarily submitted might later be deemed not voluntary. It may be deemed not voluntary if, after submission, it is subsequently "relied upon to avoid some requirement or condition of the Act or incorporated into a submission in order to satisfy some requirement or condition of the Act or of regulations which implement the Act." 40 CFR 2.306(b).

- Information submitted in an aggregate format *may* be eligible for CBI protection.

- Product ingredient information, such as the annual volume, product percentage and usage information, *may* be eligible for CBI protection.

Finally, EPA emphasizes that all submitted information identified as confidential business information will be handled as such, unless and until a determination is made to the contrary.

Thank you for your continued effort to provide EPA with the air freshener product information. Your efforts, and those of the manufacturers, are greatly appreciated.

Sincerely,

Charles M. Auer, Director
Office of Pollution Prevention and Toxics

FRAGRANCE MATERIALS ASSOCIATION OF THE UNITED STATES
1620 I Street, N.W., Suite 925
Washington, DC 20006
Telephone (202) 293-5800 • Facsimile (202) 463-8998
www.fmafragrance.org

May 15, 2008

James B. Gulliford
Assistant Administrator
OPPT Document Control Office (7407M)
EPA East - Room 6428
U.S. Environmental Protection Agency
1201 Constitution Ave., N.W.
Washington, D.C. 20460

Attn: TSCA Section 21

Dear Mr. Gulliford:

On December 18, 2007 you wrote to several air freshener manufacturers requesting that they voluntarily provide the U.S. EPA information concerning their products. In order to respond fully to your letter, these companies have contacted the companies that supply fragrances for use in their air freshener products. The Fragrance Materials Association of the U.S. (FMA) is providing assistance to the fragrance suppliers in collecting the information required to respond to the individual requests they have received from the air freshener manufacturers following your letter.

FMA representatives met with Jim Willis and officials from the EPA's Chemical Control Division and Office of General Counsel on April 17, 2008 to discuss the pending request. At that meeting FMA representatives told Mr. Willis that the complexity of collecting the fragrance ingredient data means that the fragrance suppliers would not be able to provide the requested information by the May 15, 2008 deadline. Instead of disclosing the information today, FMA and the fragrance supplier companies are providing a format and schedule for providing the information as soon as practically possible.

The FMA's role in this project has been to help our member companies organize their responses to the requests for disclosure that they have received from their customers, the air freshener manufacturers. The individual fragrance companies are voluntarily responding to the requests from the air freshener manufacturers. FMA cannot dictate any particular response to your letter, but rather we are serving as a facilitator of the discussions and we will aggregate the reported information and provide it to your office.

The Safety of Fragrance Ingredients

The safety of fragrance ingredients is a top priority for the fragrance industry. The principal means by which fragrance manufacturers address the safety of their ingredients is through their membership in the Research Institute for Fragrance Materials (RIFM). RIFM is a non-profit organization whose members include fragrance raw material suppliers and fragrance manufacturers as well as end use companies, i.e., manufacturers of consumer products such as air fresheners.

Fragrance ingredient standard setting involves a step wise process, beginning with initial substance evaluations conducted by RIFM. RIFM's evaluations are conducted by independent laboratories and are then reviewed by an independent panel of expert dermatologists, pathologists, environmental scientists and toxicologists, who form the RIFM Expert Panel, REXPAN. REXPAN members are recognized international scientific experts who are independent of the fragrance industry. The REXPAN conclusions are published in peer-reviewed scientific journals. These conclusions regarding fragrance ingredient safe use form the basis for the global industry Standards, which are set by the International Fragrance Association (IFRA).

The International Fragrance Association Code of Practice

Based in Brussels, Belgium, the International Fragrance Association (IFRA) is dedicated to ensuring that fragrance materials are safe for use in consumer products and for the environment. The membership of IFRA includes both national associations, such as the FMA, as well as individual companies. Members of IFRA agree to only produce fragrances that comply with the IFRA Code of Practice and the IFRA Standards. The IFRA Code is amended regularly and now includes a wide array of use level restrictions, or the ban, of more than 150 individual ingredients. The IFRA Code and Standards are available at: http://www.ifraorg.org/ under "Code, Standards, and Compliance."

To ensure that the IFRA Standards are being followed, IFRA conducts a compliance program to evaluate the fragrances used in consumer products via analytical chemical means. The compliance program includes the analysis of random consumer products from around the world to ensure that none contain IFRA banned ingredients. The compliance program provides confirmation that the IFRA Standards are being followed by the fragrance manufacturers.

As a follow-up to the April 17th meeting we have scheduled a briefing for interested OCD staff by technical representatives from RIFM. This briefing will take place in early June and hopefully this will lead to a continuing exchange of views regarding fragrance safety.

Collection of Fragrance Ingredient Information

In response to your December 18, 2007 letter the air freshener manufacturers are providing your office with the ingredients, *other than fragrance*, used in their air fresheners at >0.1%. Consistent with this approach, the fragrance suppliers will also provide a list of the *fragrance* ingredients present in air fresheners at >0.1%.

Fragrance suppliers will report ingredients used at >0.1% for both scientific and for practical reasons. The ingredients used in fragrances have already been subjected to the independent scientific review for safe use as described above through the RIFM process. A focus of resources in a duplicative review, on materials that are present at less than 0.1%, is unnecessary. Additionally, reporting ingredients present at lower levels would increase the complexity of the survey process and delay the response to your letter. Because the agency is interested in evaluating whether air fresheners contain ingredients that may result in exposures of potential concern, reporting ingredients present at >0.1% will provide the agency with the most meaningful toxicological information.

Because the Natural Resources Defense Council (NRDC) petitioned the EPA for this ingredient information, we will also be providing a copy of the FMA submission to them. The FMA submission of fragrance ingredients will not be considered confidential business information; however, the list could include TSCA Accession Numbers if any substances from the confidential TSCA inventory are reported as being used in air fresheners.

The fragrance suppliers began the process of collecting this data in April as their customers, the air freshener manufacturers, began providing them with product and use level information needed by the fragrance suppliers to compile their list of ingredients. While this information was being accumulated the FMA began designing a survey format and process so that we can collect the fragrance ingredient information. Once individual fragrance suppliers provide FMA with their list of ingredients we will then compile all of the individual submissions to create one list of fragrance ingredients present at >0.1% in air fresheners manufactured by the companies that received your request. The list will include the specific chemical names and the Chemical Abstract Service (CAS) numbers.

The December 18, 2007 letter also requests that the manufacturers provide "range of weight fractions or concentrations of each ingredient in each product type," and "total amount (pounds) of each ingredient used on an annual basis in each product type." At this time, the fragrance suppliers do not intend to provide this information for fragrance ingredients.

The intellectual property of fragrance suppliers consists primarily of trade secrets created when companies invent proprietary formulas. The proprietary nature of a formula relates to both quantitative and qualitative aspects. We do not consider an aggregated list of

ingredients to be proprietary in nature, however, the concentrations at which these ingredients are used are proprietary and therefore will not be disclosed.

The tonnage of each ingredient used is also proprietary in nature. In order to provide annual tonnage of fragrance ingredients the air freshener manufacturers will first have to provide their fragrance suppliers with annual tonnage information for their individual consumer products. This is sensitive proprietary information that the air freshener manufacturers just recently agreed to provide to the fragrance suppliers. The fragrance suppliers are now considering whether to provide tonnage information to the agency and we will keep you informed regarding their decisions.

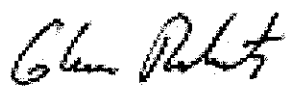
There are more than a dozen fragrance manufacturers that supply ingredients to the air freshener manufacturers that received your request. In addition, there are as many as 1,500 individual ingredients, both natural and man-made, used to create fragrances in air fresheners. Because of the significant number of manufacturers, ingredients, and individual product formulas covered by your request, we anticipate providing the reported information to your office on or before October 1, 2008. Although the fragrance suppliers want to provide the information as soon as possible, it is important that the information provided is accurate and complete. Our estimate of the time required to conduct this survey is based on extensive experience conducting similar ingredient surveys.

Conclusion

The safety of fragrance ingredients used in air fresheners, and all consumer products, is the primary concern of the FMA and our member companies. The industry supports a comprehensive safety evaluation and compliance program to insure that only safe ingredients are used at safe levels in all consumer products including air fresheners.

We hope that you will find our approach and timeline acceptable. While the fragrance suppliers were not able to provide the information as quickly as initially requested we believe our proposal as outlined above will comport with your request. Please do not hesitate to contact me if you have any questions.

Sincerely,



Glenn Roberts
Executive Director

cc: Mae C. Wu, Natural Resources Defense Council

OPPT-2007-1016

Wallace King Domike Reiskin

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[redacted]n

May 15, 2008

VIA HAND DELIVERY

COMPANY SANITIZED

OPPT Document Control Office (7407M)
EPA East – Room 6428
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20460
Attn: TSCA Section 21

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RE: CBI Submission of SOPUS Products

Dear Sir or Madam:

By letter dated December 18, 2007, US EPA requested that the Shell Oil Company voluntarily submit certain information with regard to air freshener products. Shell air fresheners are manufactured for and distributed by an affiliated company, SOPUS Products. Therefore, in response to EPA's December letter, SOPUS Products is hereby voluntarily submitting the computer disks enclosed with this letter. One of the disks is labeled as containing Confidential Business Information ("CBI"). That disk contains an electronic file with the information US EPA requested. The second disk is labeled as a "Sanitized Copy," and contains a copy of the same electronic file, but with CBI information deleted. The information presented in the electronic file represents SOPUS Products' good faith effort to respond to US EPA's request with information that is accurate as of the date of the Agency's request, *i.e.,* December 18, 2007.

Should you have any questions on the information found on the enclosed disks or this letter please contact the undersigned.

Thank you

Sincerely,

John W. Kampman

JWK:kjm
Encs.

311690

SHELL OIL PRODUCTS USA - AIR FRESHENER INGREDIENT INFORMATION

Product Type - Continuous Release - Current Ingredient Usage

Ingredient #	Chemical Name	CAS #	Function of Ingredient
1	SDA 40B Denatured Alcohol	64-17-5	Volatility Control
2	D.I. Water	7732-18-5	Solvent
3	Neodol 91-8	68439-45-2	Surfactant
4	Lithene N4-9000-MA10	25655-35-0	Gelling Agent
5	Steol CS-460	009004-82-4	Surfactant
6	Jeffamine T-403	39423-51-3	Gelling Agent
7	Ceramic	66402-68-4	Inert
8	Polyvinyl Chloride	9002-86-2	Inert
9	Shellflex 6371	64742-52-5	Copolymer
10	Isopar M	64742-47-8	Volatility Control
11	Isopar V	64742-46-7	Volatility Control
12	Irganox 1010	6683-19-8	Anti-Oxidant
13	Vector 2518	9003-55-8	Copolymer
14	Tergitol 15-S-12	68131-40-8	Preservative
15	Cellulose	9004-34-6	Inert
16	Hydrogenated Castor Oil	8001-78-3	Solvent
17	Polyoxythylene 12 nonylphenyl ether	26027-38-3	Surfactant
18	Ethyl Alcohol	64-17-5	Volatility Control
19	Kathon CG	55965-84-9	Preservative
20	Glycerin	56-81-5	Solvent
21	Potassium Chloride	7447-40-7	Preservative
22	Dow Fax 3B2	N/A	Surfactant
23	Fragrance	N/A	Fragrance

Product Type - Intermittent Spray - Current Ingredient Usage

Ingredient #	Chemical Name	CAS #	Function of Ingredient
1	SDA 40B Denatured Alcohol	64-17-5	Volatility Control
2	D.I. Water	7732-18-5	Solvent
3	Neodol 91-8	68439-45-2	Surfactant
5	Tergitol 15-S-12	68131-40-8	Surfactant
6	IPA 99%	67-63-0	Volatility Control
7	Triethylene Glycol	112-27-6	Sanitizer
8	Propylene Glycol	57-55-6	Sanitizer
9	Fragrance	N/A	Fragrance
10	Propane	74-98-6	Propellant
11	Butane	106-97-8	Propellant

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CSPA®
Consumer Specialty Products Association

May 29, 2008

OPPT Document Control Office (7407M)
EPA East-Room 6228
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20460

Attn: TSCA Section 21 OPPT-2007-1016

RECEIVED 2008 MAY 29 PM 1:24

RE: Air Freshener Ingredient Data – James Gulliford Letter of December 18, 2007

Dear Sir/Madam:

On May 15, 2008, Technology Sciences Group (TSG) submitted data on air freshener ingredients on behalf of six companies that received a December 18, 2007 letter from Assistant Administrator James B. Gulliford requesting that the companies voluntarily provide such data. Two versions of the data were submitted, one that included information claimed to be confidential business information by one or more of the six companies (the CBI version) and the other including only information for which no CBI claim was made by any company (the public version).

After reviewing the public version of the data, the six companies determined that it was necessary to submit an amended version, with clarifying endnotes. We therefore would like to withdraw our previous submission and ask that it be replaced with the amended version. The only changes to the previously submitted public disclosure version of the document are the inclusion of the endnotes.

The six companies requested that the Consumer Specialty Products Association (CSPA) make the resubmission on their behalf. Please see the enclosed revised public version, which replaces the version submitted on May 15, 2008. The CBI version remains unchanged.

Please contact me if you have any questions regarding this submission at 202-833-7309 or bklein@cspa.org.

Sincerely,

Brigid D. Klein

Brigid D. Klein
Vice President & General Counsel

311934

Aggregate Ingredient Data
Continuous Release
Air Fresheners

PUBLIC VERSION

May 15, 2008

Updated May 28, 2008 to Add Endnotes

Company Sanitized

Aggregate Ingredient Data for Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Gel Base (Carrageenan)	9000-07-1			Gellant	
Gel Base (Carboxymethylcellulose)	9000-11-7			Gellant	
Carbitol	111-90-0	85.00	85.00	Solvent	117,635
		0.00	1.00	UV Stabilizer	
2,6-bis(1,1-dimethylethyl)-4-methylphenol	128-37-0				
1,4-bis(p-tolylamino)anthraquinone	128-80-3				
		0.00	1.00	UV Stabilizer	
laural dimethylamine oxide, C12	1643-20-5	0.62	0.076	Surfactant	
Acrylamide-sodium acrylate polymer	25085-02-3		1.8	Gellant	
Dipropylene Glycol	25265-71-8	10.00	10.00	Solvent	5,563
Maleinised Polybutadiene Polymer	25655-35-0	15.00	20.00	Polymer	
Neolone(2-methyl-4isothiazolin-3-one)	2682-20-4			Preservative	
Yellow 6	2783-94-0			colorant	
myristamine oxide	3332-27-2	1.6	2		
Red 33	3567-66-6			colorant	
Acid Blue 9	3844-45-9			colorant	

Aggregate Ingredient Data for Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Benzophenone 4	4065-45-6	0.10	0.10	Preservative	52
2,4-dihydro-5-methyl-2-phenyl-4-(phenylazo)-3H-pyrazol-3-one	4314-14-1				
External Violet 2	4430-18-6			colorant	
Red 4	4548-53-2			colorant	
Alcohol	64-17-5	2.74	70.00	Solvent	
Hydantoin	6440-58-0	0.20	0.25	Preservative	66
Isopropyl Alcohol	67-63-0	10.0	15.0	solvent	
Alcohol, C12-15, ethoxylated	68131-39-5	2.5	3.1	Surfactant	
14H-benz[4,5]isoquino[2,1-a]perimidin-14-one	6829-22-7				
12H-phthaloperin-12-one	6925-69-5				
Gel Base (Potassium Chloride)	7447-40-7			Crosslink	
Silicon Dioxide	7631-86-9				
Sodium Metabisulfite	7681-57-4			Anti-oxidant	
Water	7732-18-5			Solvent/Carrier	
1-hydroxy-4-(p-toluidino)anthraquinone	81-48-1				
1-(methylamino)anthraquinone	82-38-2				

Aggregate Ingredient Data for Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Dipropylene glycol methyl ether acetate	88917-22-0	80.00	90.00	Carrier	
Polysorbate 20	9005-64-5			Surfactant	
Octoxynol	9036-19-5	1.00	1.00	Surfactant	119
Polyoxyalkyleneamine	9046-10-0	1.00	3.00	Curing Agent	
Fragrances	mixture			Fragrance	
Ethoxylated (11EO) Alcohol	Proprietary	1.0	3.0	surfactant	
Fatty alcohol ethoxylate	Proprietary	12.0	15.0	surfactant	
Botanicals		96.00	98.00	Carrier	942,840
Cardboard		65.00	65.00	Carrier	5,142

Aggregate Ingredient Data
Non-Continuous Release
Air Fresheners

PUBLIC VERSION

May 15, 2008

Updated May 28, 2008 to Add Endnotes

Aggregate Ingredient Data for Non-Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Sodium Polyacrylate	9003-04-7	0.13	0.13	buffering agent	70,000
Dioctylsodium Sulfosuccinate	000577-11-7	0.2	0.2	surfactant	100,000
Glutaraldehyde (25%)	111-30-8			Preservative	
Octadecyl Trimethyl Ammonium Chloride	112-03-8				
Triethylene Glycol	112-27-6	1	5	Solvent	
Sorbitan Monooleate	1333-68-2				
2-Methyl-1,3-Propanediol	2163-42-0	1	5	Solvent/Carrier	
Dipropylene glycol	25265-71-8	5	15	Solvent/Carrier	
MDM HYDANTOIN	27636-82-4			Preservative	
Formaldehyde	50-00-0			Preservative	
Sodium Benzoate	532-32-1			Preservative	
Ethoxylated Castor Oil	61788-85-0	1.1	1.8	surfactant	1,000,000
Ethanol	64-17-5	5	20	Solvent	
DMDM Hydantoin	644-58-0			Preservative	
C13-14 Isoparaffin	64742-47-8	35	60	Solvent	
Methanol	67-56-1			Stabilizer	
propan-2-ol	67-63-0				
Alcohol, C12-15, ethoxylated	68131-39-5	1.5	1.9	surfactant	
Alcohols C12-14, ethoxylated	68439-50-9			solubilizer	
Propellant AB-46	68476-86-8	20	30	Propellant	
Propane	74-98-6			Volatility Control	
Isobutane	75-28-5			Volatility Control	

Aggregate Ingredient Data for Non-Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Isobutane/Propane/Butane blend	75-28-5 74-98-6 106-97-8	20	35	Propellant	
Propellant 152A	75-37-6	10	100	Propellant	
Sodium Phosphate	7558-80-7				
Sodium Nitrite	7632-00-0			Preservative	
Water	7732-18-5			Solvent/Carrier	
5-dimethylhydantoin	77-71-4			Preservative	
Citric Acid anhydrous,USP/FCC	77-92-9			Stabilizer	
Polysorbate 80	9005-65-6			Surfactant	
Polysorbate 20 (97%)	9905-64-5			surfactant	
		0.3	0.3		150,000
Fragrances	Mixture			Fragrance	
Polyester 5	Proprietary			Odor Neutralizer	
Zinc Ricinoleate	13040-19-2			Odor Neutralizer	

Endnotes for Public Version of Aggregated Air Freshener Ingredient Data

1. Endnote to Both Ingredient Lists:

These lists are an aggregation of the chemicals used by six companies who make air fresheners. Not all chemicals are used in all products or by all the companies involved in this submission.

2. Endnote for Formaldehyde Ingredient [Non-Continous Release Air Fresheners, p. 1]:

Formaldehyde is not added to air freshener products as an ingredient, *per se,* but is being included in the list due to its presence in some products as a result of its release from a low concentration formaldehyde donor. The *in situ* generated formaldehyde functions as an EPA-registered antimicrobial preservative to protect some air freshener products from microbial contamination. In the presence of water, formaldehyde donors establish a dynamic equilibrium, releasing low concentrations of formaldehyde as needed to protect the formulation from microbial contamination. The EPA-registered preservative maintains free formaldehyde levels in the finished air freshener product between 67 ppm and 160 ppm (dependant on the use level in the specific formulation).

3. Endnote for All Hydantoin Ingredients/Components [Hydantoin, DMDM Hydantoin, 5-dimethylhydantoin, MDM Hydantoin]:

Hydantoin ingredients are all or part of a multi-component EPA-registered antimicrobial preservative that functions as a low-concentration-formaldehyde donor. The preservative maintains formaldehyde levels in the finished air freshener product between 67 ppm and 160 ppm (dependant on the use level in the specific formulation).

4. Endnote for All CBI Chemicals Noted in the Lists:

The companies submitting these data have confirmed to CSPA that none of the ingredients listed as confidential in the public version are benzene, formaldehyde, styrene or toluene.

Consumer Specialty Products Association

May 29, 2008

OPPT Document Control Office (7407M)
EPA East-Room 6228
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20460

Attn: TSCA Section 21

RE: Air Freshener Ingredient Data – James Gulliford Letter of December 18, 2007

Dear Sir/Madam:

On May 15, 2008, Technology Sciences Group (TSG) submitted data on air freshener ingredients on behalf of six companies that received a December 18, 2007 letter from Assistant Administrator James B. Gulliford requesting that the companies voluntarily provide such data. Two versions of the data were submitted, one that included information claimed to be confidential business information by one or more of the six companies (the CBI version) and the other including only information for which no CBI claim was made by any company (the public version).

After reviewing the public version of the data, the six companies determined that it was necessary to submit an amended version, with clarifying endnotes. We therefore would like to withdraw our previous submission and ask that it be replaced with the amended version. The only changes to the previously submitted public disclosure version of the document are the inclusion of the endnotes.

The six companies requested that the Consumer Specialty Products Association (CSPA) make the resubmission on their behalf. Please see the enclosed revised public version, which replaces the version submitted on May 15, 2008. The CBI version remains unchanged.

Please contact me if you have any questions regarding this submission at 202-833-7309 or bklein@cspa.org.

Sincerely,

Brigid D. Klein

Brigid D. Klein
Vice President & General Counsel

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15 May 2008

OPPT Document Control Office (7407M)
EPA East-Room 6428
U. S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20460

Attn: TSCA Section 21

RE: Air Freshener Ingredient Data – James Gulliford Letter of December 18, 2007

Dear EPA Representative:

Technology Sciences Group Inc. (TSG) is pleased to submit data on air freshener ingredients on behalf of six companies that received a December 18, 2007 letter from Assistant Administrator James B. Gulliford requesting that the companies provide voluntarily such data.[1] Due to the sensitivity and confidential business nature of the data, these six companies agreed to provide data on the ingredients in their air freshener products to an impartial third-party, which would aggregate and submit the data in aggregated form to EPA. TSG was selected to receive the data and perform the aggregation. TSG entered into Non-disclosure Agreements with each of the companies to assure protection of confidential information provided to us.

The six companies agreed to a standard format for the data to be submitted to TSG and provided it in two product categories: Non-Continuous Release and Continuous Release, also indicating which data was confidential business information (CBI). TSG received the data, compiled it and aggregated it into a CBI Version which contains CBI for EPA's use and a Public Version which redacts CBI. TSG did not audit or otherwise look behind the data, accepting what was submitted, nor did it make any judgments regarding the CBI claims. In aggregating the data and redacting data for the Public Version, TSG followed guidance from the companies, which is discussed further below.

The companies on whose behalf we are submitting responsive information in aggregated form assert that certain portions of such information are, and are entitled to be treated as, CBI. To facilitate the submission of both CBI and

[1] The six companies are: Reckitt Benckiser; The Dial Corp., a Henkel Co.; SC Johnson& Son; Lancaster Colony House; Blyth Inc.; and, Procter and Gamble.

non-CBI information, two versions of the companies' aggregated responses are provided. The first version (referred to as "CBI Version") includes all responsive information submitted by the companies, including information claimed to be CBI. Any information in the CBI Version that is claimed as CBI is identified by entries in a RED circle with Red type. The second version (referred to as "Public Version "), which can be made available to the public, includes only information submitted by the companies for which no claim of confidentiality has been asserted.

The information claimed as CBI is entitled to protection as such for several reasons, including the following:

1) all of the information is being submitted on a voluntary basis, consistent with the request for voluntary submission set forth in Mr. Gulliford's December 18, 2007 letters to the companies;
2) the claimed CBI information is of a kind that is not normally disclosed to the public, and EPA's ability to seek and obtain such voluntary disclosures would be negatively impacted if the Agency did not protect such information;
3) the information claimed as CBI has been submitted to TSG by the individual companies, but neither the individual submissions nor the aggregated CBI information submitted herewith as CBI Version have been, nor will be, disclosed to any of the submitting companies;
4) even if this were not a voluntary disclosure, the information claimed to be CBI would be entitled to protection as such because it is confidential, the companies routinely take measures to prevent its disclosure, and its disclosure would cause competitive harm to the companies; and
5) the fact the information is aggregated does not change the fact that it is confidential and that its disclosure would cause competitive harm.

Please contact me if you have any questions regarding this submission or the manner in which it was prepared.

Sincerely yours,

Edwin L. Johnson

Edwin L. Johnson
Senior Consultant

cc: Jim Willis, Robert Jones, Mike Mattheisen

May 15, 2008

AIR FRESHENER COMPANIES PARTICIPATING IN THE AGGREGATE REPORT AND NAMES OF PRODUCTS INCLUDED IN THE AGGREGATE DATA

COMPANY/ADDRESS	CONTACT	TELEPHONE	EMAIL	CONTINUOUS RELEASE PRODUCTS	NON-CONTINUOUS PRODUCTS
Reckitt Benckiser Inc.	Eileen Moyer	973-4042718	eileen.moyer@reckittbenckiser.com	Neutra Air® Continous Air Treatment	Air Wick® Odor Stop Aerosol
399 Interpace Parkway				Air Wick® Scented Oil	Air Wick® 2 in 1 Aerosol
Parsippany, NJ 07054				Air Wick® Crystal Air™ Air Fresheners	Neutra Air® Freshmatic® Automatic Spray
				Air Wick® Stick-Ups® Air Fresheners	Air Wick® Freshmatic® Ultra Automatic Spray
				Air Wick® Air Fresh™ Air Freshener	Air Wick® Mini Freshmatic™ Automatic Spray
				Air Wick® Decosphere® Air Freshener	Professional Air Wick® NeutrOdor Liquid Deodorizer Concentrate
The Dial Corp.	Suzanne Hagen	480-754-2208	Suzanne.Hagen@us.henkel.com	Renuzit LongLast Adjustable Air Freshener	Renuzit Super Odor Neutralizer Fine Mist Spray
15101 N. Scottsdale Road				Renuzit Car Scented Oil Air Freshener	Renuzit Subtle Effects
Scottsdale, AZ 85254				Renuzit Car Scented Oil Air Freshener Refill	Renuzit Home Fragerance Spray
				Renuzit Airlets Starter Kit Scented Oil Air Freshener	
				Renuzit Airlets Scented Oil Air Freshener Refill	
				Renuzit Electric Gel Air Freshener Starter Kit	
				Renuzit Electric Gel Air Freshener Refills	
				Renuzit RollerScents Bathroom Air Freshener	
				Renuzit Scented Oil Plug-in Air Freshener	
				Renzunit Scented Oil Plug-in Air Freshener Refills	
				Renuzit Pearl Scents Air Freshener	

May 15, 2008

AIR FRESHENER COMPANIES PARTICIPATING IN THE AGGREGATE REPORT AND NAMES OF PRODUCTS INCLUDED IN THE AGGREGATE DATA

SC Johnson & Son	Fred Joachim	262-260-4462	FJJoachi@SCJ.com	Glade Plug-in Scented Oil	Glade Aerosol Spray
1525 Howe St.	Julia Oas	262-260-4860	JAOas@SCJ.com	Glade Plug Ins	Glade Air Infusions Spray
Racine, WI 53403				Glade Glass Scents	
				Glade Car Scented Oil	
				Glade Wisp	
				Oust Odor Free Fan	
Lancaster Colony Corp.	Ken Cassidy	614-224-7141	Kcassidy@lancastercolony.com	Simmering Liquid	
37 W. Broad St.				Potporri	
Columbus, OH 43215				Reed Diffusers	
				Hang Auto Air Fresheners	
Blyth Inc.	Rob Harrington	630-845-6035	rharrington@blyth.com	PartyLite Reed Diffusers	PartyLite Room Spray
1 East Weaver Street				PartyLite Scents of Ambiance	PartyLite Linen Spray
Greenwich, CT 06831					
Procter and Gamble	Tim Elliott	513-627-4887	elliott.ts@pg.com	Febreze Noticeables Air Freshener	Febreze Air Effects
5299 Spring Grove Avenue				Dawn Simple Pleasures	
Cincinnati, OH 45217					

Aggregate Ingredient Data
Continuous Release
Air Fresheners

PUBLIC VERSION

May 15, 2008

Updated May 28, 2008 to Add Endnotes

Aggregate Ingredient Data for Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Gel Base (Carrageenan)	9000-07-1			Gellant	
Gel Base (Carboxymethylcellulose)	9000-11-7			Gellant	
Carbitol	111-90-0	85.00	85.00	Solvent	117,635
		0.00	1.00	UV Stabilizer	
2,6-bis(1,1-dimethylethyl)-4-methylphenol	128-37-0				
1,4-bis(p-tolylamino)anthraquinone	128-80-3				
		0.00	1.00	UV Stabilizer	
laural dimethylamine oxide, C12	1643-20-5	0.62	0.076	Surfactant	
Acrylamide-sodium acrylate polymer	25085-02-3		1.8	Gellant	
Dipropylene Glycol	25265-71-8	10.00	10.00	Solvent	5,563
Maleinised Polybutadiene Polymer	25655-35-0	15.00	20.00	Polymer	
Neolone(2-methyl-4isothiazolin-3-one)	2682-20-4			Preservative	
Yellow 6	2783-94-0			colorant	
myristamine oxide	3332-27-2	1.6	2		
Red 33	3567-66-6			colorant	
Acid Blue 9	3844-45-9			colorant	

Aggregate Ingredient Data for Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Benzophenone 4	4065-45-6	0.10	0.10	Preservative	52
2,4-dihydro-5-methyl-2-phenyl-4-(phenylazo)-3H-pyrazol-3-one	4314-14-1				
External Violet 2	4430-18-6			colorant	
Red 4	4548-53-2			colorant	
Alcohol	64-17-5	2.74	70.00	Solvent	
Hydantoin	6440-58-0	0.20	0.25	Preservative	66
Isopropyl Alcohol	67-63-0	10.0	15.0	solvent	
Alcohol, C12-15, ethoxylated	68131-39-5	2.5	3.1	Surfactant	
14H-benz[4,5]isoquino[2,1-a]perimidin-14-one	6829-22-7				
12H-phthaloperin-12-one	6925-69-5				
Gel Base (Potassium Chloride)	7447-40-7			Crosslink	
Silicon Dioxide	7631-86-9				
Sodium Metabisulfite	7681-57-4			Anti-oxidant	
Water	7732-18-5			Solvent/Carrier	
1-hydroxy-4-(p-toluidino)anthraquinone	81-48-1				
1-(methylamino)anthraquinone	82-38-2				

Aggregate Ingredient Data for Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Dipropylene glycol methyl ether acetate	88917-22-0	80.00	90.00	Carrier	
Polysorbate 20	9005-64-5			Surfactant	
Octoxynol	9036-19-5	1.00	1.00	Surfactant	119
Polyoxyalkyleneamine	9046-10-0	1.00	3.00	Curing Agent	
Fragrances	mixture			Fragrance	
Ethoxylated (11EO) Alcohol	Proprietary	1.0	3.0	surfactant	
Fatty alcohol ethoxylate	Proprietary	12.0	15.0	surfactant	
Botanicals		96.00	98.00	Carrier	942,840
Cardboard		65.00	65.00	Carrier	5,142

Aggregate Ingredient Data
Non-Continuous Release
Air Fresheners

PUBLIC VERSION

May 15, 2008

Updated May 28, 2008 to Add Endnotes

Aggregate Ingredient Data for Non-Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Sodium Polyacrylate	9003-04-7	0.13	0.13	buffering agent	70,000
Dioctylsodium Sulfosuccinate	000577-11-7	0.2	0.2	surfactant	100,000
Glutaraldehyde (25%)	111-30-8			Preservative	
Octadecyl Trimethyl Ammonium Chloride	112-03-8				
Triethylene Glycol	112-27-6	1	5	Solvent	
Sorbitan Monooleate	1333-68-2				
2-Methyl-1,3-Propanediol	2163-42-0	1	5	Solvent/Carrier	
Dipropylene glycol	25265-71-8	5	15	Solvent/Carrier	
MDM HYDANTOIN	27636-82-4			Preservative	
Formaldehyde	50-00-0			Preservative	
Sodium Benzoate	532-32-1			Preservative	
Ethoxylated Castor Oil	61788-85-0	1.1	1.8	surfactant	1,000,000
Ethanol	64-17-5	5	20	Solvent	
DMDM Hydantoin	644-58-0			Preservative	
C13-14 Isoparaffin	64742-47-8	35	60	Solvent	
Methanol	67-56-1			Stabilizer	
propan-2-ol	67-63-0				
Alcohol, C12-15, ethoxylated	68131-39-5	1.5	1.9	surfactant	
Alcohols C12-14, ethoxylated	68439-50-9			solubilizer	
Propellant AB-46	68476-86-8	20	30	Propellant	
Propane	74-98-6			Volatility Control	
Isobutane	75-28-5			Volatility Control	

Aggregate Ingredient Data for Non-Continuous Release Air Fresheners

Public Version

Chemical Name	CAS #	Min % in Products	Max % in Products	Function of Ingredient	Estimated Total Annual Usage 2007 (Pounds)
Isobutane/Propane/Butane blend	75-28-5 74-98-6 106-97-8	20	35	Propellant	
Propellant 152A	75-37-6	10	100	Propellant	
Sodium Phosphate	7558-80-7				
Sodium Nitrite	7632-00-0			Preservative	
Water	7732-18-5			Solvent/Carrier	
5-dimethylhydantoin	77-71-4			Preservative	
Citric Acid anhydrous,USP/FCC	77-92-9			Stabilizer	
Polysorbate 80	9005-65-6			Surfactant	
Polysorbate 20 (97%)	9905-64-5			surfactant	
		0.3	0.3		150,000
Fragrances	Mixture			Fragrance	
Polyester 5	Proprietary			Odor Neutralizer	
Zinc Ricinoleate	13040-19-2			Odor Neutralizer	

Endnotes for Public Version of Aggregated Air Freshener Ingredient Data

1. Endnote to Both Ingredient Lists:

These lists are an aggregation of the chemicals used by six companies who make air fresheners. Not all chemicals are used in all products or by all the companies involved in this submission.

2. Endnote for Formaldehyde Ingredient [Non-Continous Release Air Fresheners, p. 1]:

Formaldehyde is not added to air freshener products as an ingredient, *per se,* but is being included in the list due to its presence in some products as a result of its release from a low concentration formaldehyde donor. The *in situ* generated formaldehyde functions as an EPA-registered antimicrobial preservative to protect some air freshener products from microbial contamination. In the presence of water, formaldehyde donors establish a dynamic equilibrium, releasing low concentrations of formaldehyde as needed to protect the formulation from microbial contamination. The EPA-registered preservative maintains free formaldehyde levels in the finished air freshener product between 67 ppm and 160 ppm (dependant on the use level in the specific formulation).

3. Endnote for All Hydantoin Ingredients/Components [Hydantoin, DMDM Hydantoin, 5-dimethylhydantoin, MDM Hydantoin]:

Hydantoin ingredients are all or part of a multi-component EPA-registered antimicrobial preservative that functions as a low-concentration-formaldehyde donor. The preservative maintains formaldehyde levels in the finished air freshener product between 67 ppm and 160 ppm (dependant on the use level in the specific formulation).

4. Endnote for All CBI Chemicals Noted in the Lists:

The companies submitting these data have confirmed to CSPA that none of the ingredients listed as confidential in the public version are benzene, formaldehyde, styrene or toluene.

RECKITT BENCKISER
NORTH AMERICA

Eileen J. Moyer
Director of Regulatory Relations
Phone: (973) 404-2718
Fax: (973) 404-5676
e-mail: eileen.moyer@reckittbenckiser.com

Sent Federal Express

May 16, 2008

OPPT Document Control Office (7407M)
EPA East – Room 6428
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20460
Attn: TSCA Section 21

RE: Response to December 18, 2007 EPA Request for Voluntary Submission of Air Freshener Information – Resubmission of Non-CBI Public Disclosure Data

Dear Sir/Madam,

Reckitt Benckiser Inc. (Reckitt) voluntarily submitted ingredient information for the various types of air freshener products the company markets within the United States on May 15, 2008. We inadvertently included our non-confidential public disclosure version of the data on the same disk with the confidential business information. We are therefore resubmitting the non-confidential data to you in a redacted format. This version uses empty brackets in the spreadsheet cells that contain information we consider confidential business information. This document may be made available to the public should you receive a request for our data as it contains information that is already in the public domain.

Please contact me if you have any questions regarding this submission.

Regards,

Eileen J. Moyer
Director of Regulatory Relations
(973) 404-2718

RECKITT BENCKISER INC.

REDACTED VERSION FOR PUBLIC DISCLOSURE *

13-May-08

NON-CONTINUOUS: MANUAL AEROSOLS

A	B	C	D	E	F
Chemical Name	**CAS**	**pounds**	**min %**	**max %**	**Function**
Propellant AB-46	68476-86-8	[ ]	20.0	30.0	Propellant
Isobutane	75-28-5	[ ]	20.0	30.0	Propellant
Propane	74-98-6	[ ]	1.0	5.0	Propellant
DI Water	7732-18-5	[ ]	[ ]	[ ]	Diluent
Triethylene Glycol	112-27-6	[ ]	1.0	5.0	Solvent
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
Sodium Nitrite	7632-00-0	[ ]	0.0	0.5	Corrosion inhibitor
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
Fragrance	Proprietary mixture	[ ]	0.1	2.0	Fragrance

* All information inside brackets [ ] is Confidential Business Information.

NON-CONTINUOUS: AUTOMATIC AEROSOLS

A	B	C	D	E	F
Chemical Name	**CAS**	**pounds**	**min %**	**max %**	**Function**
Propellant AB-46	68476-86-8	[ ]	25.0	30.0	Propellant
Propellant 152A	75-37-6	[ ]	10.0	100.0	Propellant
Propellant Isobutane A-31	75-28-5	[ ]	25.0	30.0	Propellant
C13-14 Isoparaffin	64742-47-8	[ ]	35.0	60.0	Solvent
Fragrance	Proprietary mixture	[ ]	1.0	10.0	Fragrance

* All information inside brackets [ ] is Confidential Business Information.

NON-CONTINUOUS: Concentrated Liquids

A	B	C	D	E	F
Chemical Name	**CAS**	**pounds**	**min %**	**max %**	**Function**
DI Water	7732-18-5	[ ]	[ ]	[ ]	Diluent
Ethanol	64-17-5	[ ]	7.0	11.0	Solvent
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
Fragrance	Proprietary mixture	[ ]	2.0	5.0	Fragrance

* All information inside brackets **[ ]** is Confidential Business Information.

CONTINUOUS: Scented Oils

A	B	C	D	E	F
Chemical Name	**CAS**	**pounds**	**min %**	**max %**	**Function**
Fragrance	Proprietary mixture	[ ]	100.0	100.0	Fragrance

* All information inside brackets [ ] is Confidential Business Information.

CONTINUOUS: Gel Solids

A	B	C	D	E	F
Chemical Name	**CAS**	**pounds**	**min %**	**max %**	**Function**
Fragrance	Proprietary mixture	[ ]	80.0	100.0	Fragrance
Polymer	25655-35-0	[ ]	15.0	20.0	Polymer
Polyoxyalkyleneamine	9046-10-0	[ ]	1.0	3.0	Amine
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]

* All information inside brackets [ ] is Confidential Business Information.

CONTINUOUS: Impregnated Paper

A	B	C	D	E	F
Chemical Name	**CAS**	**pounds**	**min %**	**max %**	**Function**
Fragrance	Proprietary mixture	[ ]	100.0	100.0	Fragrance

* All information inside brackets **[ ]** is Confidential Business Information.

REDACTED VERSION FOR PUBLIC DISCLOSURE *

13-May-08

CONTINUOUS: Liquids

A	B	C	D	E	F
Chemical Name	**CAS**	**pounds**	**min %**	**max %**	**Function**
Fragrance	Proprietary mixture	[ ]	4.0	8.0	Fragrance
Demineralized Water or DI Water	7732-18-5	[ ]	[ ]	[ ]	Diluent
Fatty Alcohol Ethoxylate / Surfactants	Proprietary	[ ]	1.0	15.0	Surfactant
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
Isopropyl Alcohol	67-63-0	[ ]	10.0	15.0	Solvent
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
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[ ]	[ ]	[ ]	[ ]	[ ]	[ ]

* All information inside brackets **[ ]** is Confidential Business Information.

MR # 311989

DIAL

®

2008 JUN -2 AM 9:51

A Henkel Company

OPPT-2007-1016

COMPANY SANITIZED

May 30, 2008

OPPT Document Control Office (7407M)
EPA East – room 6428
U. S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20460
ATTN: TSCA Section 21

RE: Air Freshener Ingredient Data – James Gulliford Letter of December 18, 2007

Dear Document Control Officer:

Please find enclosed the amended submission of The Dial Corporation, a Henkel Company, that replaces the previous version submitted. The disks are marked "Confidential Business Information" and "Public Version." Please replace Dial's previous submission with these amended disks.

Dial submits this amended version with clarifying language explaining a specific ingredient disclosed on both the CBI and Public Versions. We have modified the Public Version to provide further clarification. Dial would also like to note that our submission provides full disclosure of all intentionally added ingredients.

The brand names of the products for which ingredient data is being voluntarily submitted are listed below by category:

- Instant Action Products:
  - Renuzit Super Odor Neutralizer Fine Mist Spray (all fragrances)
  - Renuzit Subtle Effects (all fragrances)
  - Renuzit Home Fragrance Spray (all fragrances)

- Continuous Release Products:
  - Renuzit LongLast Adjustable Air Freshener (all fragrances)
  - Renuzit Car Scented Oil Air Freshener (all fragrances)
  - Renuzit Car Scented Oil Air Freshener Refill (all fragrances)
  - Renuzit Airlets Starter Kit Scented Oil Air Freshener (all fragrances)
  - Renuzit Airlets Scented Oil Air Freshener Refill (all fragrances)
  - Renuzit Electric Gel Air Freshener Starter Kit (all fragrances)

The Dial Corporation
15101 N. Scottsdale Road
Scottsdale, AZ 85254-2199
USA

www.dialcorp.com
www.henkel.us
Phone 480.754.3425
Fax 480.754.6284

- Renuzit Electric Gel Air Freshener Refills (all fragrances)
- Renuzit RollerScents Bathroom Air Freshener (all fragrances)
- Renuzit Scented Oil Plug-in Air Freshener (all fragrances)
- Renuzit Scented Oil Plug-in Air Freshener Refills (all fragrances)
- Renuzit Pearl Scents Air Freshener (all fragrances)

The information claimed as CBI is entitled to protection as such for many reasons, including but not limited to the following:
1) all of the information is being submitted on a voluntary basis, consistent with the request for voluntary submission set forth in Mr. Gulliford's December 18, 2007 letter to The Dial Corporation;
2) the claimed CBI information is of a kind that is not normally disclosed to the public, and EPA's ability to seek and obtain such voluntary disclosures would be negatively impacted if the Agency did not protect such information;
3) even if this were not a voluntary disclosure, the information claimed to be CBI would be entitled to protection as such because it is confidential, Dial routinely takes stringent measures to prevent its disclosure, and its disclosure would cause us competitive harm.

Please contact me at (480) 754-2208 if you have any questions regarding this submission or the manner in which it was prepared.

Sincerely,

Suzanne Hagen

Suzanne Hagen
Manager, Regulatory Affairs

enclosure

Continuous Release Products
Public Version

Ing.#	Chemical Name	CAS #	Range of % in Products Containing	Function of Ingredient	2007Total Annual Usage (Pounds)
1	Water	7732-18-5	CBI	Hydration	CBI
2	Gel Base (Carrageenan)	9000-07-1	CBI	Gellant	CBI
3	Gel Base (Carboxymethylcellulose)	9000-11-7	CBI	Gellant	CBI
4	Gel Base (Potassium Chloride)	7447-40-7	CBI	Crosslink	CBI
5	Neolone(2-methyl-4isothiazolin-3-one)	2682-20-4	CBI	Preservative	CBI
6	Water	7732-18-5	CBI	Solubilizer	CBI
7	Sodium Metabisulfite	7681-57-4	CBI	Anti-oxidant	CBI
8	Fragrances	proprietary	CBI	fragrance	CBI
9	Acid Blue 9	3844-45-9	CBI	colorant	CBI
10	Acid Yellow 23	1934-21-0	CBI	colorant	CBI
11	Yellow 6	2783-94-0	CBI	colorant	CBI
12	Red 33	3567-66-6	CBI	colorant	CBI
14	Silica	7631-86-9	CBI	Thickener	CBI
15	Polysorbate 20	9005-65-5	CBI	Surfactant	CBI
16	Water	7732-18-5	CBI	Solubizer	CBI
18	Alcohol, C12-15, ethoxylated	68131-39-5	2.5 - 3.1	Surfactant	CBI
19	lauramine oxide	1643-20-5	0.62 - 0.76	Surfactant	CBI
20	myristamine oxide	3332-27-2	1.6 - 2.0	Surfactant	CBI
21	PEG-40 Hydrogenated Castor Oil	61788-85-0	CBI	Surfactant	CBI
22	Neolone(2-methyl-4isothiazolin-3-one)	2682-20-4	CBI	Preservative	CBI
23	Water	7732-18-5	CBI	solubilizer	CBI
24	Alcohol, Specially Denatured, SDA40B-200 P	64-17-5	2.74 - 3.36	solubilizer	CBI
25	Fragrance	proprietary	2.74 - 3.36	Perfume	CBI
26	Acrylamide-sodium acrylate polymer	25085-02-3	CBI	Gellant	CBI
27	Blue 1	3844-45-9	CBI	colorant	CBI
28	External Violet 2	4430-18-6	CBI	colorant	CBI
29	Red 33	3567-66-6	CBI	colorant	CBI
30	Yellow 5	1934-21-0	CBI	colorant	CBI
31	Red 4	4548-53-2	CBI	colorant	CBI
32	Fragrance oil	proprietary	100	fragrance	CBI
	**Ingredients shown in boxes are raw material mixtures with all constituents.				
	Brand Names of Continuous Release Products:				

	Renuzit Car Scented Oil Air Freshener Refill (all fragrances)				
	Renuzit Airlets Starter Kit Scented Oil Air Freshener (all fragrances)				
	Renuzit Airlets Scented Oil Air Freshener Refill (all fragrances)				
	Renuzit Electric Gel Air Freshener Starter Kit (all fragrances)				
	Renuzit Electric Gel Air Freshener Refills (all fragrances)				
	Renuzit RollerScents Bathroom Air Freshener (all fragrances)				
	Renuzit Scented Oil Plug-in Air Freshener (all fragrances)				
	Renuzit Scented Oil Plug-in Air Freshener Refills (all fragrances)				
	Renuzit Pearl Scents Air Freshener (all fragrances)				
	Renuzit LongLast Adjustable Air Freshener (all fragrance)				
	Product Ingredient Statements:				
	Renuzit Electric Gel Air Freshener Starter Kit & Refills (all fragrances) Ingredient Statement: fragrance, silica, polysorbate 20				
	Renuzit Car Scented Oil Air Freshener Refill (all fragrances): fragrance oil				
	Renuzit Airlets Starter Kit Scented Oil Air Freshener (all fragrances): fragrance oil				
	Renuzit Airlets Scented Oil Air Freshener Refill (all fragrances): fragrance oil				
	Renuzit LongLast Adjustable Air Freshener (all fragrance): water, carrageenan, carboxymethylcellulose, fragrance, potassium chloride, 2-methyl-4-isothiazolin-3-one, colorant(s)				
	Renuzit Pearl Scents Air Freshener (all fragrances): water, denatured ethanol, fragrance, alcohols, C12-15, ethoxylated, PEG-40 hydrogenated castor oil, lauryl dimethylamine oxide, 2-methyl-4-isothiazolin-3-one, colorant(s)				

Instant Action Products
Public Version

Ing.#	Chemical Name	CAS #	Range of % in Products Containing	Function of Ingredient	2007Total Annual Usage (Pounds)
1	Water	7732-18-5	CBI	Solubilizer	CBI
2	Polyester-5	proprietary	CBI	Odor Neutralizer	CBI
3	Alcohol, C12-15, ethoxylated	68131-39-5	1.5 -1.9	surfactant	CBI
4	Alcohol, Specially Denatured, SDA40B-200 Proof	64-17-5	5.2 - 6.0	solubilizer	CBI
5	Citric Acid anhydrous,USP/FCC	77-92-9	CBI	Stabilizer	CBI
6	Zinc ricinoleate	proprietary	CBI	Odor Neutralizer	CBI
7	Alcohols C12-14, ethoxylated	68439-50-9	CBI	solubilizer	CBI
8	Water	7732-18-5	CBI	solubilizer	CBI
9*	DMDM Hydantoin* (a mixture of DMDM Hydantoin (644-58-0),MDM hydantoin (CAS# 27636-82-4), 5-dimethylhydantoin (CAS# 77-71-4), formaldehyde (CAS# 50-00-0), and water (CAS# 7732-18-5))	mixture	CBI	Preservative	CBI
10	Fragrance	proprietary	0.8 - 1.2	fragrance	CBI
11	Polysorbate 80	9005-65-6	CBI	Surfactant	CBI
12	Propane	74-98-6	5.5 - 6.8	Propellant	CBI
13	Isobutane	75-28-5	16.5 - 20.5	Propellant	CBI
14	Polysorbate 20	9905-64-5	CBI	surfactant	CBI
15	Water	7732-18-5	CBI	solubilizer	CBI
16	Sodium Benzoate	532-32-1	CBI	Preservative	CBI
17	Glutaraldehyde	111-30-8	CBI	Preservative	CBI
18	Water	7732-18-5	CBI	solubilizer	CBI
19	Methanol	67-56-1	CBI	solubilizer	CBI
20	Sodium Nitrite	7632-00-0	CBI	Preservative	CBI
	*Substance 9 is a preservative known as DMDM Hydantoin. This is a multi-component EPA-registered antimicrobial preservative that functions as a low-concentration formaldehyde donor. The preservative maintains formaldehyde levels in the finished air freshener product between 67 ppm and 160 ppm.				

	**Ingredients shown in boxes represent one raw material with its constituents.				
	Brand Names of Instant Action Products:				
	Renuzit Super Odor Neutralizer Fine Mist Spray (all fragrances)				
	Renuzit Subtle Effects (all fragrances)				
	Renuzit Home Fragrance Spray (all fragrances)				
	Product Ingredient Statements:				
	Renuzit Home Fragrance Spray and Renuzit Subtle Effects: water, isobutane, propane, polysorbate 80, polysorbate 20, sodium benzoate, sodium nitrite, fragrance, glutaraldehyde				
	Renuzit Super Odor Neutralizer Fine Mist Spray: water, denatured ethanol, C12-15 ethoxylated alcohols, fragrance, citric acid, zinc ricinoleate, polyester-5, DMDM hydantoin				

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TSCA Section 21 Petition on Air Fresheners; Notice of Receipt

Comment On: EPA-HQ-OPPT-2007-1016-0001
Air Fresheners; TSCA Section 21 Petition; Notice of Receipt

Document: EPA-HQ-OPPT-2007-1016-0045
Comment submitted by Rick Hackman, Proctor & Gamble (P&G)

Submitter Information

Submitter's Representative: Rick Hackman
Organization: Proctor & Gamble

General Comment

Attachments

EPA-HQ-OPPT-2007-1016-0045.1: Comment attachment submitted by Rick Hackman, Proctor & Gamble (P&G)

OPPT-2007-9016

P&G

ORIGINAL

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OPPT Document Control Office (7407M)
EPA East – Room 6428
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20460
Attn: TSCA Section 21, Mr. Robert Jones

Dear Mr. Jones,

This note is in response to James Gulliford's letter of December 18th, 2007, requesting a broad range of ingredient information for air freshener products manufactured by the Procter & Gamble Company. We are pleased to inform you that we will be submitting this information via the program that has been negotiated with the EPA by the Consumer Specialty Products Association (CSPA). We believe this will be an excellent mechanism to share the requested information in a way that will help the Agency evaluate this topic in a comprehensive manner. We applaud the EPA and CSPA for developing such a collaborative solution.

Please do not hesitate to contact me if you have any questions or need any additional information. Thank you for your time and consideration.

Sincerely,

Rick Hackman

Rick Hackman

CONTAINS NO CBI

310762

Consumer Specialty Products Association

June 11, 2008

Mr. Jim Willis
Division Director
Chemical Control Division
Office of Pollution Prevention and Toxic Substances
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20460
Willis.jim@epa.gov

Re: Air Freshener Ingredient Data Supplied on May 15, 2008

Dear Mr. Willis:

The purpose of this letter is to supply information on air freshener ingredients that goes beyond the data supplied pursuant to the December 18, 2007, letter from James Gulliford to seven air freshener manufacturers. This information is therefore supplemental to the data provided to you by several of those companies and by a CSPA contractor, on May 15, and annotated by CSPA in a letter from Brigid Klein to the TSCA Section 21 docket on May 29, 2008. CSPA is submitting this additional data with the understanding that it can be added to the public versions of the data previously provided.

Further discussions with the Petitioners relating to the non-CBI public version of the ingredient data that we provided to them and you on May 29 have raised questions regarding the potential use of phthalates as ingredients in air fresheners. We have therefore asked the seven air freshener companies to provide to us further information regarding their intentional use of phthalates in their air fresheners reported to EPA on May 15 and May 29.

Those seven companies have confirmed that no phthalate ingredients are intentionally added at any level in the non-fragrance ingredients they use in formulating these products. This specifically includes the seven phthalates that Petitioners have informed us are of greatest concern to them—*i.e.,* di-n-propyl phthalate (DPP) (CAS# 131-16-8); di-n-butyl phthalate (DBP) (CAS# 84-74-2); butyl benzyl phthalate (BBP) (CAS# 85-68-7); di-n-hexyl phthalate (DnHP) (CAS# 84-75-3); di(2-ethylhexyl) phthalate (DEHP, DOP) (CAS# 117-81-7); diisononyl phthalate (DiNP) (CAS# 28553-12-0); and, diisodecyl

phthalate (DiDP) (CSA# 26761-40-0). In addition, these seven companies have confirmed that, to the best of their knowledge, the only phthalate used as a component in any of the fragrances they use in these air fresheners is diethyl phthalate (DEP) (CAS# 84-66-2). We understand that the Fragrance Materials Association will be confirming this latter determination with the fifteen fragrance ingredient suppliers for these seven companies' products and providing this confirmation to EPA in a separate letter.

As you undoubtedly already know, DEP has been extensively tested and evaluated by authorities and scientific groups in the U.S. and Europe including comprehensive evaluations by the U.S. Environmental Protection Agency (EPA), the European Commission's Scientific Committee on Consumer Products and the World Health Organization, all of which found that DEP is safe for use in consumer products. In addition, the Research Institute for Fragrance Materials (RIFM) does a rigorous safety assessment and approves each use of DEP as a component of fragrance materials used in various air fresheners and other consumer products.

We hope that this additional information is helpful in your review of the data supplied by air freshener manufacturers both directly and through CSPA's contractor. Please feel free to contact us if there is any further information you need in this matter.

Sincerely,

D. Douglas Fratz

D. Douglas Fratz
Vice President, Scientific and Technical Affairs

cc: Mae C. Wu, Natural Resources Defense Council
Linda Greer, Natural Resources Defense Council
Mike Mattheisen, U.S. Environmental Protection Agency
Bob Jones, U.S. Environmental Protection Agency
Phil Klein, Consumer Specialty Products Association
Brigid Klein, Consumer Specialty Products Association
Chris Cathcart, Consumer Specialty Products Association
John Cox, Fragrance Materials Association