

**Reporting Forms for Submitting 1996 Data Required by  
the  
Antiperspirant and Deodorant Regulation\***

California Environmental Protection Agency



**Air Resources Board**

\* Title 17, California Code of Regulations, Division 3, Chapter 1, Subchapter 8.5, Article 1, Antiperspirants and Deodorants.

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## INSTRUCTIONS FOR COMPLETING THE REPORTING FORMS

Please complete the enclosed reporting forms for all antiperspirant and deodorant products that you sell in California. The reporting forms consist of:

1. **One company information form**
2. **Product information forms Part I and Part II**

Number items consecutively to ensure that the assigned number for a product is the same on Part I and Part II. Copy additional forms for Part I and Part II as necessary.

Please read all the instructions and definitions prior to completing the reporting forms. If you have any questions, please do not hesitate to call:

Julie Billington	(916) 327-1516
Janette Brooks	(916) 322-9148

Please submit completed reporting forms **no later than March 1, 1997**, to:

California Air Resources Board  
Stationary Source Division  
Air Quality Measures Branch  
P.O. Box 2815  
Sacramento, CA 95812  
Attention: Genevieve Shiroma - AP/DO Reporting

### **Directions for Filling Out Product Information Form: Part I**

1. **Item number.** Please assign one number for each product or group of products. Number products consecutively.
2. **Product name.** List the product name of each product exactly as it appears on the principal display panel of your product. Products based on the same formulation may be aggregated if:
  - 1) the product formulation is identical except for the fragrance type or coloring or both;

or,

- 2) the product comes in various sizes

If you choose to group similar product formulations, list all the product names of the formulation that are aggregated in the "comments" section provided on reporting form Part I. You should also indicate in the "comments" section if you grouped various sizes of one product. However, you do not need to list the various sizes of one product.

Please make sure that sales figures in column 6 reflect the total amount of product sold.

3. **Product Category.** Indicate product category, using "A" for antiperspirants, "D" for deodorants or "B" for both. For descriptions of these categories, please see included definitions.
4. **Number of products grouped.** If you group products, indicate how many individual products are combined within that group. Please identify the names of products you have grouped in the comments section of Part I.
5. **Product form.** Indicate product form, using "A" for aerosols, "S" for sticks, "R" for roll-ons, "P" for pumps, or "O" for others. If your product falls into the category of "others," briefly describe the dispensing form of this particular product under the "comments" section of Part I of the reporting forms.
6. **Product sales in California.** Calculate the amount of product sold by multiplying the weight of each product unit (excluding container and packaging, but including propellant) times the number of units sold:

Product unit weight (pounds) x units sold in CA per year = total amount sold in CA per year.

If sales data specific to California are not available, you may apportion your total sales based on the estimated proportion of your sales that occur in California. Use 1996 calendar year for the California sales. If 1996 sales data are not available, you may use the most recent 12-month period available to you. Identify this "most recent" 12 month period reported in the comments section on Part I. Indicate the amount sold in pounds. Please do not use fluid ounces.

#### **Directions for Filling Out Product information form: Part II**

7. **Item number.** Please assign one number for each product or group of products. Number products consecutively. The number entered here should be identical to the number you inserted for the corresponding product in Part I.

\* 8. **Low volatility organic compounds (LVOC).** The term “LVOC” refers to carbon containing compounds with either:

1. A vapor pressure less than 2.0 mm Hg at 20EC, or
2. more than 10 carbon atoms, if the vapor pressure is unknown.

State the percent by weight to the nearest 0.1 percent of any LVOC other than fragrance per product or aggregated products.

$$(\text{percent by weight}) = \frac{A}{B} \times 100$$

where: A = weight of LVOC, and

B = net weight of product (including propellant but excluding container and packaging)

\*9. **Medium volatility organic compounds (MVOC).** The term “MVOC” is defined as:

Any organic compound that exerts a vapor pressure greater than 2 mm Hg and less than or equal to 80 mm Hg when measured at 20°C.

There are two subcategories for MVOCs:

1. Ethanol
2. MVOCs other than ethanol and/or fragrance.

Fill in the percent by weight to the nearest 0.1 percent for each subcategory.

Note: For ethanol, provide the actual amount of ethanol only. List any water contained in the ethanol separately under column 13 (non-carbon containing compounds).

\*10. **High volatility organic compounds (HVOC).** The term “HVOC” means:

any organic compound that is not exempt from the VOC definition and exerts a vapor pressure greater than 80 mm Hg when measured at 20°C.

State the percent by weight of HVOC to the nearest 0.1 percent per product or series of grouped products.

- \*11 **Exempt volatile organic compounds.** Exempt volatile organic compounds (VOC) are carbon containing compounds that are exempted from the definition of VOC. This may include propellants. Exempt VOCs that are propellants should be identified and listed separately and the percent by weight should be stated for each compound. Exempt VOCs other than propellants should also be identified; however, percent by weight for these compounds may be listed as an aggregate total and does not have to be listed individually.
- \*12. **a. Fragrance.** Indicate the percent by weight of fragrance. Fragrance means a substance or complex mixture of aroma chemicals, natural essential oils, and other functional components with a combined vapor pressure not in excess of 2 mm of Hg at 20°C, the sole purpose of which is to impart an odor or scent, or to counteract a malodor.
- b. Colorant.** Colorant means any substance or mixture of substances, the primary purpose of which is to color or modify the color of something else.
- \*13. **Non-carbon containing compounds.** Give the percent by weight of any non-carbon containing compounds. If a non-carbon containing compound is a propellant, give its percent by weight in the appropriate column.

**\* Note: Columns 8-13 should add up to 100%.**

**Comments.** Any additional information you would like to add.

## DEFINITIONS

**Aerosol Product:** a pressurized spray system that dispenses antiperspirant or deodorant ingredients.

**Antiperspirant:** any product, including aerosols, roll-ons, sticks, pumps, pads, creams, squeeze bottles, and others that is intended by the manufacturer to reduce perspiration in the human axilla by at least 20 percent in at least 50 percent of a target population.

**Colorant:** any pigment or coloring material used in a consumer product for an aesthetic effect, or to dramatize an ingredient.

**Deodorant:** any product, including aerosols, roll-ons, sticks, pumps, pads, creams, squeeze bottles, and others that is intended by the manufacturer to be used to minimize odor in the human axilla by retarding the growth of bacteria which cause decomposition of perspiration.

**Exempt volatile organic compound (VOC):** any carbon-containing compound specifically excluded from the volatile organic compound (VOC) definition.

**Fragrance:** a substance or complex mixture of aroma chemicals, natural essential oils, and other functional components with a combined vapor pressure not in excess of 2 mm of Hg at 20°C, the sole purpose of which is to impart an odor or scent, or to counteract a malodor.

**High volatility organic compound (HVOC):** any organic compound that exerts a vapor pressure greater than 80 mm Hg when measured at 20°C.

**Low volatility organic compound (LVOC):** any organic compound which has either of the following:

1. Exerts a vapor pressure less than 2.0 mm Hg at 20°C, or
2. more than 10 carbon atoms, if the vapor pressure is unknown.

**Medium volatility organic compound (MVOC):** any organic compound that exerts a vapor pressure greater than 2 mm Hg and less than or equal to 80 mm Hg when measured at 20°C.

**Principal display panel:** principal display panel or panels means that part, or those parts of a label that are so designed as to most likely be displayed, presented, shown or examined under normal and customary conditions of display or purchase. Whenever a principal display panel appears more than once, all requirements pertaining to the

principal display panel shall pertain to all such principal display panels.

**Propellant:** a liquefied or compressed gas that is used in whole or part, such as a co-solvent, to expel a liquid or any other material from the same self-pressurized container or from a separate container.

**Pump product:** any antiperspirant or deodorant that dispenses active ingredients by means of a nonpressurized packaging system in which the product ingredients are expelled only while a pumping action is applied to a button, trigger, or other actuator by the hand of the operator.

**Roll-on product:** any antiperspirant or deodorant that dispenses active ingredients by rolling a wetted ball or wetted cylinder on the affected area.

**Stick product:** any antiperspirant or deodorant that contains active ingredients in a solid matrix form, and that dispenses the active ingredient by frictional action on the affected areas.

**Volatile Organic Compound (VOC):** means any compound containing at least one atom of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, and excluding the following:

- (1) methane,  
methylene chloride (dichloromethane),  
1,1,1-trichloroethane (methyl chloroform),  
trichlorofluoromethane (CFC-11),  
dichlorodifluoromethane (CFC-12),  
1,1,2-trichloro-1,2,2-trifluoroethane (CFC-113),  
1,2-dichloro-1,1,2,2-tetrafluoroethane (CFC-114),  
chloropentafluoroethane (CFC-115),  
chlorodifluoromethane (HCFC-22),  
1,1,1-trifluoro-2,2-dichloroethane (HCFC-123),  
1,1-dichloro-1-fluoroethane (HCFC-141b),  
1-chloro-1,1-difluoroethane (HCFC-142b),  
2-chloro-1,1,1,2-tetrafluoroethane (HCFC-124),  
trifluoromethane (HFC-23),  
1,1,2,2-tetrafluoroethane (HFC-134),  
1,1,1,2-tetrafluoroethane (HFC-134a),  
pentafluoroethane (HFC-125),  
1,1,1-trifluoroethane (HFC-143a),  
1,1-difluoroethane (HFC-152a),

cyclic, branched, or linear completely methylated siloxanes,  
the following classes of perfluorocarbons:

- (A) cyclic, branched, or linear, completely fluorinated alkanes;
- (B) cyclic, branched, or linear, completely fluorinated ethers with no unsaturations;
- (C) cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations; and
- (D) sulfur-containing perfluorocarbons with no unsaturations and with the sulfur bonds to carbon and fluorine, and

- (2) the following low-reactive organic compounds which have been exempted by the U.S. EPA:

acetone,  
ethane,  
parachlorobenzotrifluoride (1-chloro-4-trifluoromethyl benzene).

**Weight percent:** means the weight of a VOC as a percent of the net product weight, i.e. excluding container and packaging weight.

$$\text{percent by weight} = \frac{(X)}{(Y_p)} \times 100$$

where: X = weight of VOC in product, and

Y<sub>p</sub> = net weight of product (including propellant but excluding container and packaging)

## Sample Reporting Forms

Pages 10-13 contain hypothetical examples of antiperspirants and deodorants and demonstrate how information should be entered into the reporting forms. These forms serve as an example and do not need to be submitted.

The examples include:

- A. *Company Information Form*
- B. *Product Information Form Part I*
- C. *Product Information Form Part II*

# COMPANY INFORMATION FORM

## CALIFORNIA AIR RESOURCES BOARD

### ANTIPERSPIRANT & DEODORANT REPORTING FORMS

Please fill out the requested information about your company. Provide us with the complete company name and mailing address. Identify a contact person, specify this person's title, and provide his or her phone and FAX number. This sheet needs to be completed only once for each company and should be attached to the product information forms upon submittal.

Company name: Smith-Meyer

Address: 3030 Deo Drive

City, State, ZIP: Anytown, CA 92345

Contact person: Jane Doe

Title: Director of Research and Development

Phone: (123) 456-7890 FAX: None Available

Confidential information:  (yes)  (no)

For ARB Use Only	
Date received:	Log #:
ARB comments:	

### Antiperspirant and Deodorant Reporting Forms: Part I

Company: Smith-Meyer

Page 1 of 2

(1) Item #	(2) Product Name	(3) Product Category			(4) # of products grouped	(5) Product form: Aerosol (A) Stick (S) Roll-on (R) Pump (P) Other (O)	(6) California 1996 Product Sales  in pounds
		"A" (antiperspirant)	"D" (deodorant)	"B" (both)			
1	Always Fresh	X			3	A	3507
2	Underarm Deodorant		X		1	S	25045

Item #	Comments:
1	Comes in three scents: Baby Fresh, Soft Floral, Mountain Fresh

### Antiperspirant and Deodorant Reporting Forms: Part II

Company: Smith-Meyer

Page 2 of 2

	<b>CARBON CONTAINING COMPOUNDS</b>										<b>NON CARBON COMPOUNDS</b>	
	<b>All Values in Percent by Weight (% Wt.)</b>											
(7) Item #	(8)†† LVOC (% Wt.) (<2mm Hg at 20°C)	(9)†† MVOC (% Wt.) (2-80 mm Hg at 20°C)		(10)‡ HVOC (% Wt.) (>80 mm Hg at 20°C)	(11)‡ Exempt VOCs				(12a)‡ Fragrance	(12b)‡ Colorant	(13)‡ Non-carbon containing compounds	
		Ethanol only	All Others		Propellant	% Wt.	Others	% Wt.	% Wt.	% Wt.	Propellant	Other (% Wt.)
1	10	30		15	CO <sub>2</sub>	10			0.25	0.25		34.5
2	80.5								0.40	0.60		18.5

† Do not include fragrance

‡ Columns 8-13 should add up to 100%

**Item #      Comments**


# COMPANY INFORMATION FORM

## CALIFORNIA AIR RESOURCES BOARD

### ANTIPERSPIRANT & DEODORANT REPORTING FORMS

Please fill out the requested information about your company. Provide us with the complete company name and mailing address. Identify a contact person, specify this person's title, and provide his or her phone and FAX number. This sheet needs to be completed only once for each company and should be attached to the product information forms upon submittal.

Company name:

\_\_\_\_\_

Address:

\_\_\_\_\_

City, State, ZIP:

\_\_\_\_\_

Contact person:

\_\_\_\_\_

Title:

\_\_\_\_\_

Phone: \_\_\_\_\_ FAX: \_\_\_\_\_

Confidential information: \_\_\_\_\_ (yes) \_\_\_\_\_ (no)

For ARB Use Only	
Date received:	Log #:
ARB comments:	

**Antiperspirant and Deodorant Reporting Forms: Part I**

Company: \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

(1) Item #	(2) Product Name	(3) Product Category			(4) # of products grouped	(5) Product form: Aerosol (A) Stick (S) Roll-on (R) Pump (P) Other (O)	(6) California 1996 Product Sales  in pounds
		"A" (antiperspirant)	"D" (deodorant)	"B" (both)			

**Item #      Comments:**


**Antiperspirant and Deodorant Reporting Forms: Part II**

Company: \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

	<b>CARBON CONTAINING COMPOUNDS</b> All Values in Percent by Weight (% Wt.)										<b>NON CARBON COMPOUNDS</b>	
(7) Item #	(8)†‡ LVOC (% Wt.) (<2mm Hg at 20°C)	(9)†‡ MVOC (% Wt.) (2-80 mm Hg at 20°C)		(10)‡ HVOC % Wt. (>80 mm Hg at 20°C)	(11)‡ Exempt VOCs				(12a)‡ Fragrance	(12b)‡ Colorant	(13)‡ Non-carbon containing compounds	
		Ethanol only	All Others		Propellant	% Wt.	Others	% Wt.	% Wt.	% Wt.	Propellant	Other (% Wt.)

† Do not include fragrance

‡ Columns 8-13 should add up to 100%

**Item #      Comments**


**CONFIDENTIAL INFORMATION SUBMITTAL FORM**

**(If you wish to designate any information contained in your reporting data as confidential, please provide the data requested below and return with your reporting forms.)**

In accordance with Title 17, California Code of Regulations (CCR), Section 91000 to 91022, and the California Public Records Act (Government code Section 6250 et seq.), the information that a company provides to the Air Resources Board (ARB) may be released (1) to the public upon request, except trade secrets which are not emissions data or other information with is exempt from disclosure or the disclosure of which is prohibited by law, and (2) to the Federal Environmental Protection Agency (EPA), which protects trade secrets as provided in Section 114© of the Clean Air Act and amendments thereto (42 USC 7401 et seq.) and in federal regulation, and (3) to other public agencies provided that those agencies preserve the protections afforded information which is identified as a trade secret, or otherwise exempt from disclosure by law (Section 39660(e)).

Trade secrets as defined in Government Code Section 6254.7 are not public records and therefore will not be released to the public. However, the California Public Records Act provides that air pollution emission data are always public records, even if the data comes within the definition of trade secrets. On the other hand, the information used to calculate information is a trade secret.

If any company believes that any of the information it may provide is a trade secret or otherwise exempt from disclosure under any other provision of law, it must identify the confidential information as such at the time of submission to the ARB and must provide the name, address, and telephone number of the individual to be consulted if the ARB receives a request for disclosure or seeks to disclose the data claimed to be confidential. The ARB may ask the company to provide documentation of its claim of trade secret or exemption at a later date. Data identified as confidential will not be disclosed unless the ARB determines, in accordance with the above referenced regulations, that the data do not qualify for a legal exemption from disclosure. The regulations establish substantial safeguards before any such disclosure.

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In accordance with the provisions of Title 17, California Code of Regulations, Section 91000 to 91022, and the California Public Records Act (Government Code Sections 6250 et seq.),

**Company Name:** \_\_\_\_\_ declares that all the information submitted in response to the California Air Resources Board’s Antiperspirant and Deodorant Reporting Requirements is confidential “trade secret” information, and request that it be protected as such from the public disclosure. All inquiries pertaining to the confidentiality of this information should be directed to the following person:

Date: \_\_\_\_\_

Mailing Address:

\_\_\_\_\_ (Signature)

\_\_\_\_\_ (Printed Name)

\_\_\_\_\_ (Title)

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(Telephone Number)

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