



December 28, 2004

Dorothy Shimer  
Research Division  
Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812  
[ab1173@listserv.arb.ca.gov](mailto:ab1173@listserv.arb.ca.gov)

Subject: *Draft for Peer Review: Report to the California Legislature: Indoor Air Pollution in California*

Dear Ms. Shimer,

The Soap and Detergent Association (SDA) appreciates the opportunity to submit comments on the revised *Draft for Peer Review Report to the California Legislature: Indoor Air Pollution in California* pursuant to Health and Safety Code (HSC) (§) 39930 (Assembly Bill 1173, Keeley, 2002).

The Soap and Detergent Association is a 100-member national trade association representing the formulators of soaps, detergents, general household cleaning products, industrial/institutional cleaners, and the companies that supply ingredients and packaging to the formulators. As such, our comments will be limited to the statements on consumer and industrial/institutional products in relation to cleaning products and practices.

### **Comments on Draft Report**

#### *General Comments*

SDA recognizes the efforts that went into the revision and enhancement of this draft. We appreciate the acknowledgement that regular cleaning with proper cleaning methods can reduce biological contaminants, the increased inclusion of references, and the listing of cleaning products as medium priority for mitigation.

The report (properly) includes household and institutional cleaners as sources of methylene chloride, para-dichlorobenzene, perchloroethylene, toluene, benzene, naphthalene, formaldehyde, acetaldehyde, and metals. However, in water soluble, surfactant-based products, these ingredients are not intentionally added. Therefore, these chemicals should be absent or at de minimus levels in the water soluble, surfactant-based products. We recommend a clarification to the terms for household and institutional cleaners.

#### *Specific Comments*

## **Executive Summary**

### *Irritant Effects (pg 5)*

This section mentions the use of terpenes in cleaning products and their reaction with oxidants to produce formaldehyde and ultrafine PM. SDA recommends the inclusion of a reference for this section.

## **Toxic Air Contaminants and Other Indoor Air Pollutants**

### *Volatile Organic Compounds (pg 8)*

SDA recommends that a reference be included in this section.

### *Table ES-3.2 – Medium Priority Source Categories for Mitigation (pg 22)*

In Table ES-3.2, household and institutional cleaners are listed as sources of methylene chloride, para-dichlorobenzene, perchloroethylene, toluene, benzene, naphthalene, formaldehyde, acetaldehyde, and metals. However, in water soluble, surfactant-based products, these ingredients are not intentionally added. Therefore, these chemicals should be absent or at de minimus levels in the water soluble, surfactant-based products. We recommend a clarification to the terms for household and institutional cleaners.

### *2.3.7 Mercury (pg 87)*

The paragraph describing the types and uses of mercury does not detail the products with inorganic mercury. We recommend their inclusion.

#### *2.3.7.2 Sources of Mercury (pg 87)*

The U.S. EPA report, “Reducing Mercury Use in Healthcare: Promoting a Healthier Environment”, states that mercury can be a contaminant in detergents and cleansers when the mercury-cell process is used to manufacture some cleaning product ingredients. SDA recommends this be stated. Also, the products mentioned in the U.S. EPA report are down-the-drain products. Recognizing this, we would not expect any mercury that may be in a product to become air borne.

Moreover, there are no validated methodologies for testing cleaning products for mercury. It is therefore highly probable that reported test findings only indicate sample-based testing limitations, not actual mercury concentrations.

#### *4.3.1.2 Government Guidelines for Consumer Products (pg 120-121)*

SDA recommends the addition of the description of California’s Department of General Services (DGS) EPP Task Force to the report.

### *Table 6.2 – Medium Priority Source Categories for Mitigation (pg 153)*

Please see our comments on Table ES-3.2 (pg 22).

## *Summary and Conclusions*

SDA and its member companies appreciate this opportunity to review and comment on the revised Draft Report. Our comments reflect our continuing efforts to provide the most accurate technical data to date, and protect human health through improved indoor air quality.

We look forward to working with the ARB to submit a finalized report to the California Legislature. Please contact us at any time if you have any questions.

Respectfully submitted,

*Kathleen Stanton*

Kathleen Stanton  
Manager, Scientific Affairs

Cc: Richard Bode, Chief Health and Exposure Assessment Branch, Research Division  
Peggy Jenkins, Indoor Exposure Assessment Section, Research Division  
Richard Sedlak, Vice President, Technical and International Affairs, SDA