

TSCA Section 21 Citizens' Petition Regarding Risk Management for Alkylbenzenesulfonates and Ethoxylated Surfactants in Consumer Detergents

1. STATUTORY AUTHORITY This petition is filed pursuant to **Section 21 of the Toxic Substances Control Act (TSCA) (15 U.S.C. § 2620)**. The Petitioner requests the Administrator initiate a rulemaking proceeding under **TSCA Section 6(a)**.

2. CHEMICAL SUBSTANCES IDENTIFIED This petition concerns the following chemical substances ("The Substances") widely used in consumer liquid laundry detergents:

- **Sodium C10-16 Alkylbenzenesulfonate** (CAS RN: 68081-81-2)
- **Sodium Laureth Sulfate (SLES)** (CAS RN: 68585-34-2)
- **1,4-Dioxane** (CAS RN: 123-91-1) *[Present as a manufacturing impurity]*

3. REQUESTED ACTION The Petitioner requests that the EPA issue a rule under **TSCA Section 6(a)** determining that the ongoing use of The Substances in consumer laundry detergents presents an **unreasonable risk of injury to human health**. Specifically, the Petitioner requests:

1. **Mandatory Warning Labels:** Requirement for labels to state "Concentrated residues of this product are known skin irritants."
2. **Impurity Disclosure:** Mandatory disclosure on the physical product label when **1,4-Dioxane** is detectable above 0.1 ppm, due to its classification as a probable human carcinogen.

4. STATEMENT OF FACTS The Petitioner asserts that The Substances present an **unreasonable risk** under their specific "conditions of use" (i.e., residue remaining on clothing).

- **Toxicological Profile:** The EPA's own **2020 Risk Evaluation for 1,4-Dioxane** identified unreasonable risks to health. 1,4-Dioxane is a byproduct of the ethoxylation process used to create SLES in detergents. Current regulations allow its hidden presence, exposing the public to chronic carcinogenic risks via dermal contact.
- **Exposure Pathway:** Recent consumer reports (SaferProducts.gov Report #5382567) indicate that "High Efficiency" washing machines often fail to rinse these chemicals from fabrics, creating a continuous dermal exposure pathway that is not addressed by current labeling.

5. CONCLUSION The Petitioner has set forth facts establishing that The Substances present an unreasonable risk. The EPA is urged to grant this petition.

Sincerely,

Andrew Gonzalez

Research to support petition

Exhibit A: Manufacturers' Admission of Toxicity

- **Document:** [Procter & Gamble Tide Liquid Laundry Detergent Safety Data Sheet \(SDS\)](#)
- **relevance:** Manufacturer explicitly admits the product causes "**Serious eye irritation**" and "**Skin irritation**" (Section 2: Hazards Identification).

Exhibit B: Evidence of Consumer Injury

- **Document:** SaferProducts.gov Incident Report [5382567](#) and [5404762](#).
- **Relevance:** Documents specific instances of severe physical injury (chemical burns) and respiratory distress caused by the product.

Exhibit C: Scientific Consensus on Fragrance Risks

- **Document:** Steinemann, A. (2016). "*Fragranced consumer products: exposures and effects from emissions.*" Air Quality, Atmosphere & Health.
- **Link:** [Access Research Here](#)
- **Relevance:** Peer-reviewed study finding that 33% of the population suffers adverse health effects (migraines, asthma, rash) from fragranced laundry products.

Exhibit D: EPA Findings on 1,4-Dioxane

- **Document:** EPA Final Risk Evaluation for 1,4-Dioxane (2020/2023).
- **Link:** [EPA.gov Risk Evaluation](#)
- **Relevance:** Official government finding that 1,4-Dioxane presents an "unreasonable risk of injury," supporting the request for mandatory disclosure of this impurity in detergents.