

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

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### 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.