

**ToxServices' Design for the Environment (DfE)
Safer Product Labeling
Product Formulation Form**

About ToxServices LLC

ToxServices LLC is a scientific consulting firm that excels at providing toxicology, regulatory, and risk assessment consulting services to industrial, commercial, and public sector clients. We specialize in evaluating potential health risks from industrial chemicals, pharmaceuticals, food additives, food contact materials, cleaning products, and consumer products. We help clients comply with applicable federal, state, and local environmental health and safety regulations, and provide clients with strategic assistance in instances when products are claimed to be associated with adverse health effects.

DfE Review Process

ToxServices performs reviews and renewals of product formulations for the U.S. Environmental Protection Agency's Design for the Environment (DfE) Safer Product Labeling Program. To initiate the review process, please return the signed non-disclosure agreement and formulation form to allow ToxServices to provide you with a quote and invoice for 50% of the cost estimate, which will be required to initiate the review process.

Once ToxServices receives the signed retainer agreement and initial payment for 50% of the cost estimate, the review process will begin. Generally, we aim to complete reviews and submit them to the EPA within 6 to 8 weeks of receiving all proprietary chemical information.

Confidentiality

ToxServices enters into non-disclosure agreements with their clients and often with clients' suppliers. The agreements state that ToxServices will treat all product information received as confidential business information, and only authorized personnel, including EPA personnel, will be permitted to access the information provided on this form. Project records and reports are maintained with ToxServices for a minimum of 5 years upon completion of the project, and are either destroyed or returned to client at their written request.

Product Information: (please submit one page per formulation, use additional sheets as needed)

Product Information Request Form			
Company Name:	Primary Contact:		
Product Name:	Phone Number:		
Submission Date:	Email:		
Partnership Date:	Contact Address:		
Annual Production (in lbs or gallons/year):			
Product pH: <i>(must be >2 and <11.5; if personal care product designed for prolonged dermal contact, pH must be >4 and >9.5)</i>			
Type of Product:	Production Address:		
Give a brief product description:			
How is the product used?			
Check one: <input type="checkbox"/> Industrial <input type="checkbox"/> Commercial <input type="checkbox"/> Both	Product Form: <input type="checkbox"/> Liquid <input type="checkbox"/> Trigger <input type="checkbox"/> Sprayer <input type="checkbox"/> Aerosol Other (please describe):		
Is the product a concentration?			
If Yes, dilution volume:			
Is the product a direct release product (see footnote ¹ , below)?			
Does the product contain enzymes?			
If Yes, what is the total percent composition of the enzymes?			
What are the microbial sources of the enzymes?			
Is the product an EPA registered pesticide?			
Is the product fragranced?			
If Yes, is product IFRA compliant?		<i>(If IFRA compliant, attach IFRA certificate)</i>	
Performance testing methods ² :		(Attach perform test results)	
Packaging Type (Size and Material):			
Which DfE sustainable packaging standards ³ does the product meet?			
Criteria	Met?	Not Met?	Documentation Attached?
Is sourced, manufactured, transported, and recycled using renewable energy?			

¹ Direct release product: A product that is intended for use in applications that result in immediate release to the environment, so that it bypasses sewage treatment or septic systems, shortening the time for degradation prior to entering sensitive environments. Home car washes, boat cleaners and graffiti removers are examples of direct-release products (DfE SSCP, April 2011).

² See Section 4.2.1 for product specific performance testing requirements (DfE SSCP, April 2011)

³ See Section A.16 for criteria (DfE SSCP, April 2011)

Optimizes the use of renewable or recycled source materials?				
Is manufactured using clean production technologies and best practices?				
Is made from materials healthful in all probable end-of-life scenarios?				
Is physically designed to optimize materials and energy?				
Is effectively recovered and used in biological and/or industrial closed-loop cycles?				
Do the packaging materials contain any heavy metals or ingredients of concern? ⁴				
Chemical	Present?	Not present?	Unknown if present?	Documentation Attached?
heavy metals				
bisphenol-A				
dibutyl phthalate (DBP)				
diisobutyl phthalate (DIBP)				
butyl benzyl phthalate (BBP)				
di-n-pentyl phthalate (DnPP)				
di(2-ethylhexyl) phthalate (DEHP)				
di-n-octyl phthalate (DnOP)				
diisononyl phthalate (DINP)				
diisodecyl phthalate (DIDP)				
Does the product require hazard labeling (DOT, OSHA, etc)?				
If Yes, what and why?				

⁴ See Section 4.2.6 for specific requirements (DfE SSCP, April 2011)

Formula Information: (please use additional sheets as needed)

Product Formula Request Form							
Company Name:				Technical Contact:			
Submission Date:				Phone Number:			
Product Name:				Email:			
Type of Product:				Address:			
Product pH:							
All intentional ingredients must be added, including all residuals of concern							
CAS #	Chemical or Enzyme Name	Trade Name	Supplier ⁵	Proprietary Ingredient	Function/ Ingredient Class ⁶	% Composition ⁷	Other information (i.e. molecular weight)

THIS FORMULATION IS CONSIDERED CONFIDENTIAL BUSINESS INFORMATION AND WILL NOT BE DISCLOSED

⁵ Each supplier must be identified

⁶ If the chemical is a polymer, please complete the Polymer Information Request form for EACH polymer (see page 4)

⁷ All enzyme containing ingredients MUST identify the percentage of enzyme in the formulation

Data Collection for Assessment of Polymers

Polymer Representative Structure

(E.g. []_{mon} for polymers with one monomer OR []_m and []_n for copolymers, etc.)

<p align="center">% of Each Monomer</p>	<p align="center">Are the monomers blocked?</p>	<p align="center">MW_n</p>	<p align="center">% of Chains with MW<1,000; % of Chains with <500</p>	<p align="center">% Weight Residual Monomer(s)</p>	<p align="center">Solubility/ Dispersability/ Swellability</p>	<p align="center">Particle Size</p>	<p align="center">Overall Polymer Charge</p>

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Certification statement:

I hereby certify that, to the best of my knowledge, the information provided to ToxServices is accurate and complete. I understand that the information submitted may be used as a basis for reviewing and/or accepting other products that contain this material and/or the ingredients herein. I also understand and agree that the information I have provided on this form was requested for EPA's Design for the Environment (DfE) review, and may be submitted to the EPA's Design for the Environment Safer Product Labeling Program.

Signature _____ Date _____

For forms submitted electronically, check this box to indicate agreement to the Certification Statement above (required).

Typed or printed name: _____

Position/Title: _____

Return instructions:

To send by e-mail, check the box indicating your agreement with the certification statement, and send your e-mail with attachments to DfE@toxservices.com.

To send by fax, completely fill out and sign the form, then fax to **202-429-8788**.

To send by U.S. mail or courier, insert completed form in an envelope marked "Confidential Business Information," seal in an outer envelope, and return to:

Callie Taylor
ToxServices LLC
1367 Connecticut Avenue, N.W., Suite 300
Washington, DC 20036
USA

Questions? Please contact Ms. Callie Taylor at ctaylor@toxservices.com or 202-429-8789

Formulation assistance:

CAS number (Chemical Abstracts Service registry number): is a systematic numbering convention that uniquely identifies each chemical. If the ingredient is a mixture of several chemicals, enter the word “mixture.” All CAS numbers are up to nine digits, which are separated into three groups by hyphens. The first part of the number, starting from the left, has up to six digits; the second part after the first hyphen has two digits. Finally, the third part of the CAS number following the last hyphen is single digit. For example, a CAS number may look like: 123456-12-1. If it is not in this format, it is not a valid CAS number. If you cannot determine a CAS number for an ingredient, leave this area blank.

Ingredient Class: can refer to surfactants, solvents, chelators, fragrances, polymers, preservatives/biocides, builders, hydrotropes, sequestrants, dispersants, sanitizers, dyes/colorants, enzymes/microorganisms, fragrances, and other.

Trade Name: is the unique name or identification number of the ingredient as you purchase it from your supplier.

Supplier: is the company from whom you purchase this ingredient. If you know that your supplier is a distributor, and you know the name of the company that manufactures the ingredient, please enter both company names here. Write (D) after the distributor’s name, and (M) after the manufacturer’s name. For each ingredient that you purchase from more than one supplier, please enter each chemical name, trade name, supplier, and % on a separate line.

Percentage Composition: the total of all components must always equal 100%.

A formula description is provided below as an example:

CAS #	Chemical Name	Trade Name	Supplier	Function/ Ingredient Class	% Composition	Other Information
68131-39-5	Alcohols, Ethoxylated	Name 1	Company 1	Solvent	14.25	
1310-73-2	Sodium Hydroxide	Name 2	Company 2	Buffer	0.041	
Proprietary	Name	Name 3	Company 3	Fragrance	1.18	
7732-18-5	Water	Name 4	Company 4	Solvent	83.53	
Proprietary	Amylase	Name 5	Company 5	Enzyme	1%	