



# Advisory

---

Antiperspirant/Deodorant  
Regulation  
1994 Requirements

Number 105

November 1993

## Antiperspirant/Deodorant Regulation: 1994 Requirements

This advisory is to remind the manufacturers of Antiperspirants and Deodorants of their regulatory obligations in California. There are two very important dates coming up. The first is January 1, 1994 when aerosol manufacturers have the option of submitting compliance plans, and the second is March 1, 1994 when the reporting requirements are due wherein companies with products regulated by Title 17, Subchapter 8.5, Article 1, Antiperspirants and Deodorants, California Code of Regulations are required to file a written report/plan with the Air Resources Board (ARB) stating how they will achieve regulatory compliance and provide certain product data to the ARB. The Title 17 text describing these requirements and the deadline criteria is reproduced, in part below.

Special provisions for Aerosol products are contained in Section 94502 (e). (Due Date: January 1, 1994)

### Special Requirements for Aerosol Manufacturers

- (1) On or before January 1, 1994, a manufacturer of aerosol products may submit to the Executive Officer a compliance plan which describes how the manufacturer will achieve compliance with the requirements of section 94502(a) for aerosol products.
- (2) For each aerosol manufacturer who submits a compliance plan pursuant to subsection (e)(1), the Executive Officer shall suspend the 1/1/1995 requirements of Section 94502(a) for aerosol products until a date on or before January 1, 1999....(provided that specified criteria are met).

Reporting requirements for all forms of Antiperspirants and Deodorants are found in Section 94504:

## **Administrative Requirements**

### **(b) Reporting**

(1) On or before **April 1, 1991**, and no later than **March 1** of each third year thereafter, each manufacturer subject to this article shall submit to the Executive Officer a written report. The report shall describe how the manufacturer will meet the requirements of section 94502.

(2) The report submitted pursuant to subsection (b) (1) shall include the following information:

the brand name for each antiperspirant or deodorant product;

the owner of the trademark or brand name;

the product forms (aerosol, pump, etc...);

the California annual sales in pounds per year and the method used to calculate California sales;

the total VOC (as defined in Section 94501(n)) content in percent by weight which: (a) has a vapor pressure of 2.0 mm Hg or less at 20 degrees Centigrade, or (b) consists of more than 10 carbon atoms, if the vapor pressure is unknown;

the total HVOC and MVOC content (as defined in Section 94502(a)) in percent by weight.

In addition to the information required in Section 94504(b)(2) and under our general authority to collect emissions data (Health and Safety Code, Section 41511; Title 17, California Code of Regulations Section 91100) we are requesting certain other information. In almost all of the cases, this information directly relates to specific exemptions which would need to be verified by laboratory testing. For your convenience we have enclosed 2 forms where you may record the required information.

The following is a list of frequently asked questions and the ARB's reply.

**Q: Who needs to report ?**

**A: Any person or business entity that produces antiperspirants or deodorants that are sold, supplied, or offered for sale in California.**

**Q: What should I include in my report to the ARB?**

**A: You should include any information that shows how you intend to comply with the regulation along with the information specified in the enclosed forms. Manufactures of aerosol deodorants and antiperspirants who desire to submit a compliance plan pursuant to Section 94502(e), should include in their compliance plan information that outlines the steps that the manufacturer will take to develop a compliant product and the schedule or timeline he or she will follow. This compliance plan should identify all of the events in the process of developing aerosol products complying with the standards. The report should also include any information on the development of substitute aerosol propellants, including the progress that has been made to test these propellants for toxicity and feasibility.**

**Q. Will the information submitted be kept confidential?**

**A. Any information that you indicate is confidential will be kept confidential according to procedures specified in Title 17 California Code of Regulation, Sections 91000-91022.**

**Q: When is the report due?**

**A: All manufactures of antiperspirants and deodorants that are sold, supplied, or offered for sale in California must submit data reporting information on or before March 1, 1994. Aerosol antiperspirant and deodorant manufactures who choose to submit a compliance plan must submit their plans on or before January 1, 1994.**

**Q; Where do I send this report?**

**A: Aerosol antiperspirant and deodorant manufactures submitting compliance plans should mail these plans to the Executive Officer at the address listed below.**

**Compliance is your responsibility. It is even more critical given the recent changes in the penalties structure of the California Health and Safety Code, Sections 42400-42400.3 and Sections 42402-42402.3, increasing the dollar amounts of civil and criminal liabilities plus adding a strict liability clause.**

**If you have any further questions about the regulation or need additional information, please telephone Roye Jackson, Manager of the Field Enforcement Section, at (916) 322-6033.**

**James J. Morgester, Chief  
Compliance Division  
California Air Resources Board  
P.O.Box 2815  
Sacramento, CA 95812**



# **California Air Resources Board**

**November 1993**

## **Reporting Forms for Antiperspirant and Deodorant Regulation**

- 1 INSTRUCTIONS FOR COMPLETING THE REPORTING FORMS**
- 2. DEFINITIONS**
- 3. EXAMPLE OF COMPLETED REPORTING FORMS**
- 4. ACTUAL REPORTING FORMS**
  - A. COMPANY INFORMATION FORM**
  - B. CONFIDENTIAL INFORMATION SUBMITTAL FORM**
  - C. PRODUCT INFORMATION FORMS PART I**
  - D. PRODUCT INFORMATION FORMS PART II a**
  - E. PRODUCT INFORMATION FORMS PART II b**

## 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, Part II a, and Part II b**

Number items consecutively to ensure that the assigned number for a product is the same on Part I and Part II a & b. Copy additional forms for Part I and Part II a & b as necessary. Part I and IIa need to be completed for all current products.

Read the entire instructions plus definitions prior to completing the reporting forms. If you have questions, please call:

Karin Ricker	(916) 323-1519
Peggy Taricco, Manager	(916) 322- 8283
Roye Jackson, Manager	(916) 322-6033

Please submit completed reporting forms no later than **March 1, 1994**, to:

California Air Resources Board  
Compliance Division  
PO Box 2815  
Sacramento, CA 95812

Attention : Field Enforcement Section/Antiperspirant & Deodorant Reporting

## INSTRUCTIONS (cont.)

### 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 various sizes of one product. Please make sure that sales figures in column 8 reflect the total amount of product sold.

3. **Product Category.** Indicate whether your product is an antiperspirant (A), deodorant (D), or both (B). Please see attached 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. **Existing product.** An "existing product" is any antiperspirant or deodorant product that was available in California prior to January 1, 1990. If the product you are reporting was available in California prior to January 1, 1990, and the formula has not changed, then indicate so by checking "yes". If not, then mark "no".
6. **Reformulated product.** State if the product you are reporting has been reformulated from an existing product that contains ethanol. If you check "yes", identify the former existing product in the comments section of Part I and indicate date when the reformulated product was available for sale in California. [Please note that you are requested to provide data for the old formulation (i.e., prior to reformulation) in reporting form IIb. Reporting form IIb is for formulations from old products only. Please make sure that the item numbers for the original and the reformulated product are the same].
7. **Product form.** Indicate product form, such as aerosol (A), stick (S), roll-on (R), or other (O). Use the letters indicated in brackets to describe your product. 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.

8. **Product sales in California.** Calculate the amount of product sold by multiplying product weight (excluding container and packaging, but including propellant) times the number of units sold:

$$\text{product weight (pounds)} \times \text{units sold in CA per year} = \text{total amount sold in CA per year.}$$

Use 1993 calendar year for sales figures for California. If 1993 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. Do not use fluid ounces.

## INSTRUCTIONS (cont.)

### Product information form part IIa & b

#### Product information form Part II a

This form is for all current products and requests data for the formulation of all the products that you report. Please use form IIa for current products.

#### Product information form Part II b

If you marked "yes" under column number 6 to indicate that your current product had been reformulated from an existing product, then please fill out form IIb for the "old" product (e.g. prior to reformulation). Please report the formulas of these products in form II b. Please make sure that the item number from an old product is identical to the item number of the current (i.e., reformulated) product.

9. **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 in row 1, column 1 on Part I of the reporting forms. For the second row, it should be identical to row 2, column 1 etc.
- \*10. **Low volatile organic compounds (LVOC).** The term "LVOC" refers to carbon containing compounds with either:
1. 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

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

$$(\text{percent by weight}) \text{ Column 10} = \frac{(X_{10})}{(Y_p)} \times 100$$

where  $X_{10}$  = weight of LVOC

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

- \*11. Medium volatile 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 (ETOH)
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 15 (non-carbon containing compounds).

- \*12. High volatile organic compounds (HVOC).** The term "HVOC" means:

any organic compound that 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.

- \*13. Table B compounds.** Table B compounds are carbon containing compounds that are exempted from the definition of VOC. This may include propellents. Table B compounds that are propellents need to be listed separately and the percent by weight should be stated for each compound. Table B compounds other than propellents also need to be identified; percent by weight for these compounds may be listed as an aggregate total and does not have to be listed individually.

- \*14. a. Fragrance.** Indicate the percent by weight of fragrance. Fragrance includes any substance or mixture of substances where the primary purpose is to impart an odor or scent.

**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

- \*15. Non-carbon containing compounds.** Give the percent by weight of any non-carbon containing compounds. If a non-carbon containing compound is a propellant, indicate so by checking the appropriate column and give its percent by weight.

**\* Note:** Columns 10-15 should add up to 100%

**Comments.** Anything 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.

**Existing product:** any antiperspirant or deodorant formulation which was sold, supplied, offered for sale, or manufactured in California prior to January 1, 1990 ; or any identical antiperspirant or deodorant formulation which is sold, supplied, offered for sale, or manufactured in California by any person after January 1, 1990. Note: For the purpose of this reporting requirement, list only ethanol containing products.

**Fragrance:** fragrance includes any substance or mixture of substances the primary purpose of which is to impart an odor or scent.

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

**Low volatile 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 volatile 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 liquified 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.

**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.

**Table B compound:** any carbon containing compound listed as an exception to the definition of VOC.

**Type A propellant:** a compressed gas such as CO<sub>2</sub>, N<sub>2</sub>, N<sub>2</sub>O, or compressed air which is used as a propellant, and is either incorporated with the product or contained in a separate chamber within the product's packaging.

**Type B propellant:** any halocarbon which is used as a propellant including chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and hydrofluorocarbons (HFCs).

**Type C propellant:** any propellant which is not a Type A or Type B propellant, including propane, isobutane, n-butane, and dimethyl ether (also known as dimethyl oxide).

**Volatile organic compound:** any compound containing at least one atom of carbon, except

methane	trichlorofluoromethane (CFC-11)
carbon monoxide	dichlorodifluoromethane (CFC-12)
carbon dioxide	chlorodifluoromethane (HCFC-22)
carbonic acid	trifluoromethane (HFC-23)
metallic carbides	1,1,1-trichloro-2,2,2-trifluoroethane (CFC-113)
carbonates	1-chloro-1,1-difluoro-2-chloro-2,2-difluoroethane (CFC-114)
ammonium carbonate	chloropentafluoroethane (CFC-115)
1,1,1-trichloroethane	2,2-dichloro-1,1,1-trifluoroethane (HCFC-123)
methylene chloride	1,1,1,2-tetrafluoroethane (HFC-134a)
	1,1-dichloro-1-fluoroethane (HCFC-141b)
	1-chloro-1,1-difluoroethane (HCFC-142b)
	2-chloro-1,1,1,2-tetrafluoroethane (HCFC-124)
	pentafluoroethane (HFC-125)
	1,1,2,2-tetrafluoroethane (HFC-134)
	1,1,1-trifluoroethane (HFC-143a)
	1,1-difluoroethane (HFC-152a)

and 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;
- (D) sulfur-containing perfluorocarbons with no unsaturations and with the sulfur bonds only to carbon and fluorine.

**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 P and  $Y_p$  = net weight of product (including propellant but excluding container and packaging)

# Sample Reporting Forms

The following pages 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 a*

*D. Product Information Form Part II b*

# 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: Sweetscent, Ca 91234

Contact person: Jim Smith, Ph.D.

Title: Director of Research & Development

Phone: (123) 456-7890 FAX (123) 555-7878

Confidential information  (yes)  (no)

FOR ARB USE ONLY	
Date received:	Log #:
ARB comments:	

**ANTIPERSPIRANT AND DEODORANT REPORTING FORMS PART I**

Company: Smith-Meyer

(1) Item #	(2) Product name	(3) Product category			(4) # of products grouped	(5) Existing product		(6) Reformulated ethanol containing product Date & identify in comments section		(7) Product form: aerosol (A) stick (S) roll-on (R) other (O)	(8) CA 1993 product sales in pounds
		A	D	B		yes	no	yes	no		
1	No Sweat	x			3	x				A	3507 lbs
2	Sweet Axilla		x				x			S	25045 lbs
3	New Generation Knock Out	x						x		R	8134 lbs

Item #	Comments
1	Comes in 3 scents: No Sweat Baby Fresh; No Sweat Soft Floral; No Sweat Mountain Pine
3	"New Generation Knock Out" was introduced into CA in 3/91. It was based on a reformulation of our previous formula "Knock Out".

**ANTIPERSPIRANT AND DEODORANT REPORTING FORMS PART IIa**  
current products only

Company: Smith-Meyer

Page 2 of 8

	CARBON CONTAINING COMPOUNDS									NON CARBON COMPOUNDS		
(9) Item #	(10) ** LVOC % weight (< 2mmHg at 20°C)	(11) ** MVOC % weight (2- 80 mm Hg at 20°C)		(12) HVOC % weight (>80 mmHg at 20°C)	(13) Table B Compounds				14a Fragrance % wgt.	14b colorant % wgt.	(15) Non-carbon containing compounds	
		ETOH only	All others		Propellent	% weight	Others	% weight			Propellent % weight	Other % weight
1	10	30		15	CO <sub>2</sub>	10			0.25	0.25		34.5
2	80.5								0.4	0.6		18.5
3	70	10							0.7			19.3

\*\* Do not include fragrance

\* Columns 10-15 should add up to 100%

Item #	Comments

**ANTIPERSPIRANT AND DEODORANT REPORTING FORMS PART II b**  
 Previous product data prior to reformulation3

Company: Smith-Meyer

CARBON CONTAINING COMPOUNDS										NON CARBON COMPOUNDS		
(9) Item #	(10) ** LVOC % weight (< 2mmHg at 20°C)	(11) ** MVOC % weight (2- 80 mm Hg at 20°C)		(12) HVOC % weight (>80 mmHg at 20°C)	(13) Table B Compounds				14a Fragrance % wgt.	14b Colorant % wgt.	(15) Non-carbon containing compounds	
		ETOH only	All others		Propellant	% weight	Others	% weight			Propellant % weight	Other % weight
3	75	5							0.3	0.4		19.3

\*\* Do not include fragrance

\* Columns 10-15 should add up to 100%

Item #	Comments
3	Line 3 contains formula for "Knock Out"

# Reporting Forms

The following pages constitute the actual reporting forms that you are to complete and return to the Air Resources Board.

The reporting forms consist of the following items:

## Reporting forms

- A. *Company Information Form*
- B. *Confidential Information Submittal Form*
- C. *Product Information Form Part I*
- D. *Product Information Form Part II a*
- E. *Product Information Form Part II b*

Please fill out each form and submit to the Air Resources Board by **March 1, 1994**. Submit one copy each of Form A (*Company information form*) and B (*Confidential Information Submittal Form*). Complete and submit additional copies of forms C, D & E (*Product information Forms Part I & Product information Forms Part II a & b*) as needed.

**CALIFORNIA AIR RESOURCES BOARD**

**ANTIPERSPIRANT & DEODORANT REPORTING REQUIREMENTS**

**COMPANY INFORMATION FORM**

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:	

**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 which 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(c) 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.

17

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 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)

(Telephone Number)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ANTIPERSPIRANT AND DEODORANT REPORTING FORMS PART I**

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

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

(1) Item #	(2) Product name	(3) Product category			(4) # of products grouped	(5) Existing product		(6) Reformulated ethanol containing product Date & identify in comments section		(7) Product form: aerosol (A) stick (S) roll-on (R) other (O)	(8) CA 1993 product sales in pounds
		A	D	B		yes	no	yes	no		

**Item #      Comments**




**Antiperspirant & Deodorant Reporting Forms Part II b**  
 Previous product data prior to reformulation

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

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

(9) Item #	CARBON CONTAINING COMPOUNDS								NON CARBON COMPOUNDS			
	(10) ** LVOC % weight (<2mmHg at 20°C)	(11) ** MVOC % weight (2- 80 mm Hg at 20°C) do not include H <sub>2</sub> O		(12) HVOC % weight (>80 mmHg at 20°C)	(13) Table B Compounds				14a Fragrance	14b Colorant	(15) Non-carbon containing compounds	
		ETOH only	All others		Propellent	% weight	Others	% weight			% wgt	% wgt.

\*\* Do not include fragrance

\* Columns 10-15 should add up to 100%

Item #	Comments