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July 26, 1973

Honorable Sam J. Ervin, Jr.
United States Senate
Washington, D.C. 20510

Dear Senator Ervin:

The Congressional Liaison Office of the Department of Health, Education, and Welfare has directed your June 18 referral of Mrs. Willie Edmondson's letter to this agency for consideration. Mrs. Edmondson is concerned that such chemicals as formaldehyde, dieldrin, aldrin, and lindane are being used to treat permanent press clothing.

We have no information on dieldrin, aldrin, and lindane in permanent press fabrics or clothing. Since these chemicals are pesticides as defined by the Federal Insecticide, Fungicide and Rodenticide Act, they are not subject to the jurisdiction of the Consumer Product Safety Commission. We are therefore forwarding a copy of your correspondence to the Environmental Protection Agency for their consideration. Formaldehyde, however, is subject to the Federal Hazardous Substances Act, which is administered by the Commission. Under the provisions of this Act, household substances containing 1 percent or more of formaldehyde have been found to have significant potential for causing hypersensitivity and are thus designated as strong sensitizers.

An excess of formaldehyde is sometimes used in the polymerization of resins in permanent press fabrics or may be liberated from an incomplete polymerization process. However, such fabrics do not contain 1 percent or more of formaldehyde. Most cases of skin rash appear to be due to the unusual sensitivity of a few individuals to this chemical and to the slight excess or incomplete polymerization described above. One or two washings usually remove the source of irritation since formaldehyde is water soluble.

We have previously considered the status of permanent press clothing under the Act and have concluded that is not in the strong sensitizer category. In reaching this conclusion, it was

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acknowledged that some portion of the population is sensitive in one way or another to almost every article that enters the household, including foods and household soaps. Congress, in enacting the Federal Hazardous Substances Act, did not intend that precautionary labeling would be required on all such products (Senate Report 1158, 86 Congress 2nd Session, p. 11). A strong sensitizer must be a substance which affects a significant portion of the population and which may cause a strong or severe reaction.' This is not the case with permanent press clothing.

We hope these comments are helpful. If you have any further questions, please let us know.

Sincerely yours,

Richard O. Simpson
Chairman

cc: Environmental Protection Agency
Pesticides Regulation Division
South Agricultural Building
Washington, D. C. 20250

bcc: R. O. Simpson
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