

**Rhodia Statement for
Safer Detergents Stewardship Initiative (SDSI)
US EPA Design for the Environment (DfE)
Public Meeting
June 12, 2006**

I am Dr. Glenn Simon. I am the Director of Toxicology for Rhodia. Rhodia is a manufacturer of nonylphenol ethoxylates (NPEs), the chemical being discussed here today. It is important to note, also, that Rhodia manufactures a broad line of diverse surfactants besides NPEs, hundreds in fact, for use in the US and globally. My concern is that the SDSI program promotes deselection of NPE surfactants without any scientific justification.

Scientists know that surfactants, by their very chemical nature, have the potential to be toxic to aquatic organisms. Some are more toxic and some are less. In the real world, the actual risk of harming fish and other organisms is based not only on the surfactants' toxicity, but on the actual concentration and duration to which the organisms are exposed.

It has been pointed out today that levels of NP/NPEs have not been shown to be of concern in US surface waters. In the very limited number of locations where NP/NPE concentrations in water could present a concern, there are broader compliance issues. It is a charade to suggest that simply removing NPEs will restore the quality of these waters.

If there is a concern about the mild estrogenic activity of NP - a minor degradants of NPEs - in wastewater effluent, then there ought to be one-million times that level of concern for the highly potent estrogenicity of human hormones in that same waste stream.

The Alkylphenols & Ethoxylates Research Council recently participated in a study to evaluate the fate of various surfactants in three typical US wastewater treatment plants. Findings confirm that in the real world NPE is no different than the other surfactants. It is treatable. It is biodegradable. And it is with few exceptions not present in US surface waters at levels of concern.

The DfE group should be held to a higher standard than what they have presented here. There is no evidence that the SDSI program will result in improvements in environmental quality. Yet, their actions will have real commercial and financial impact on end-users - especially small businesses.