

## **Guidance for Completing the AAFA Voluntary Product and Environmental Profile (VPEP) Form**

**Version 0 (September 8, 2015)**

### **INTRODUCTION AND PURPOSE**

The American Apparel and Footwear Association (AAFA) Voluntary Product and Environmental Profile (VPEP) Form is a common format for chemical suppliers to use to communicate the environmental and regulatory status of chemicals to their customers in the textile industry. The information provided facilitates safe, sustainable, and compliant use of raw materials.

### **GENERAL INSTRUCTIONS**

Please provide the requested information and complete all areas with data or one of the abbreviations listed. Please do not use “See MSDS” as a response. If a paper version of this form is being submitted, additional pages may be added for items such as lengthy chemical names.

The receiver of this form respects the need to maintain proprietary information. Please give as much information as possible, such as chemical class or functional groups.

### **SECTION I: PRODUCT AND SUPPLIER GENERAL INFORMATION**

- (1) Product – Please supply the product name as it will be marked on the container as shipped. Also, list the name that will appear on the MSDS, if different.
- (2) Supplier – Please record the name of the company supplying the product.
- (3) Supplier Product Number – Please record a product number, if applicable.
- (4) Supplier Material Safety Data Sheet (MSDS) Number
- (5) Manufacturer– Please list the name of the product manufacturer. If the name of the supplier (as given previously in Section I) will appear on the MSDS and the product container, the manufacturer does not need to be listed.
- (6) Chemical Family – Please list any chemical compound group names that may describe the general chemical composition of the product. (Examples: acrylic polymer, azo dyestuff)
- (7) Product Use – If the product has a designated use, please list it here. (Examples: flame retardant, antimicrobial)
- (8) Technical Information Phone Number – Please list a telephone number to which technical questions about the product can be directed. Please note the location (country) of the number.

(9) Emergency Phone Number – Please list a telephone number to which emergency questions about the product can be directed 24 hours per day. Please note the location (country) of the number.

(10) Are all components of this product listed in the TSCA Inventory or exempt from listing? – The Toxic Substances Control Act (TSCA) Inventory is a listing of chemical substances manufactured for commercial purposes that is maintained by the US EPA. More information about the Inventory is available on the [EPA website](#). Please mark “No” or “Yes” in response to this question. If the product or any of its components are not listed on the TSCA Inventory, but are exempted from listing, please note on the form which exemption applies (Examples: FIFRA exemption, LVE exemption.). Water does not need to be considered.

(11) What is the status of the components of this product under REACH? – Please describe the status of the components of the product under REACH. Because components may have different statuses, more than one answer may be marked. If any component is not registered or preregistered, please mark “Other” and describe the status in the blank provided. REACH is a European Community Regulation on chemicals and their safe use (EC 1907/2006). More information about this regulation is available on the [European Commission website](#).

(12) Is the chemical registered and/or approved for commercial import/use in the following countries: Canada, China, El Salvador, Honduras, Japan, and Korea? – Mark “Yes” or “No” for each referenced country to indicate whether the product has been registered and/or approved for commercial import or use for that country.

(13) Is this product synthesized from benzidine chemistry (Per EPA SNUR 61 FR 52287)? – Please indicate if the product contains any of the benzidine-based substances listed in [Table 1 of 40 CFR 721.1660](#).

(14) Do any other Significant New Use Rules (SNURs) apply? – Please indicate if any additional Significant New Use Rules apply to this product or its components. If so, provide the specific CFR reference. SNURs are given in [40 CFR 721](#).

(15) Is supplier a participant in a program that addresses safety, health, and environmental issues (Examples: Responsible Care®, ETAD Dyecare®, SOCMA ChemStewards®)? – Please mark “No” or “Yes” in response to this question and, if the answer is “Yes”, please list the programs.

## SECTION II. GENERAL HAZARD INFORMATION - FORMULATED PRODUCT

The questions in this section apply to the formulated product as a whole.

(1) OSHA Hazard? – Please indicate whether the product is a hazardous chemical as defined in [29 CFR 1910.1200](#). Please mark “No” or “Yes” in response to this question.

(2) Globally Harmonized System of Classification and Labeling of Chemicals (GHS) Classification: – If the chemical is hazardous, provide the appropriate hazard classes and categories under the Globally Harmonized System of Classification and Labeling of Chemicals. Classification requirements are given in the appendices to the 2012 OSHA Hazard Communication standard in [29 CFR 1910.1200](#). If the chemical is not hazardous, the field may be left blank or marked as “Not Applicable.”

(3) - (7) U.S. Department of Transportation Regulated? – Please indicate whether the product is a hazardous material as defined in [49 CFR 171](#) and [49 CFR 172](#). Please answer “No” in response to this question or list the proper shipping name in (3) through (7).

(8) Regulated Hazardous Waste? – Please indicate whether the product would be a hazardous waste, as defined in [40 CFR 261](#), if it was discarded in the form supplied to the customer. Answer “No” in response to this question or list one or more characteristic waste codes (D001, D002, etc.) that would apply to the product.

(9) SARA 311/312? – Please indicate whether the product is a hazardous chemical as defined in [40 CFR 370](#). Please note that this definition references the definition of an OSHA hazardous chemical as described above. As a result, in most cases any product marked as an OSHA hazard will be expected to have SARA 311/312 hazard categories marked.

(10) HMIS or NFPA Ratings. – Please list the Hazardous Materials Information System (HMIS) or Nation Fire Protection Association (NFPA) ratings for the product. Useful descriptions of the [HMIS rating system](#) and the [NFPA rating system](#) can be found at the MSDS Hyper Glossary Website.

### SECTION III. PRODUCT DATA

For Section III, percentages such as >1 and <99 are not useful. Please provide the maximum value. Please use the following codes:

C (Component) - Present at levels  $\geq 0.1\%$ ;

P (Present) - Present at levels  $\geq 100$  ppm and  $< 0.1\%$ ;

T (Trace) - Present at levels  $< 100$  ppm;

X (Not Present) - The substance has not been added to the product and there is no reason to expect it to be present.

Algicide/Biocide – Please use the codes listed (C, P, T, or X) to indicate the concentration range of any algicides or biocides that are added to the product or are known to be present in the product. Enter the codes in the box to the left of the algicide/biocide name. Please supply any additional information (generic/ class identification, max amount, and units) that is available.

Defoamer – Please use the codes listed (C, P, T, or X) to indicate the concentration range of any defoamers that are added to the product or are known to be present in the product. Enter the codes in the box to the left of the defoamer name. Please supply any additional information (generic/ class identification, max amount, and units) that is available.

Surface Active Agent – Please use the codes listed (C, P, T, or X) to indicate the concentration range of any surface active agents (surfactants) that are added to the product or are known to be present in the product. Enter the codes in the box to the left of the surface active agent name. Please supply any additional information (generic/ class identification, max amount, and units) that is available. If surface active agents are present, please indicate the type (cationic, anionic, nonionic) or family (APEs, quaternary ammonium).

Formaldehyde – Please use the codes listed (C, P, T, or X) to indicate the concentration range of any formaldehyde that is added to the product or are known to be present in the product.

Enter the codes in the box to the left of the formaldehyde name. Please supply any additional information (generic/ class identification, max amount, and units) that is available.

Alkyl Phenol Ethoxylates (including Octyl, Nonyl, and Decyl) - Indicate Type – Please use the codes listed (C, P, T, or X) to indicate the concentration range of any Alkyl Phenol Ethoxylates that are added to the product or are known to be present in the product. Enter the codes in the box to the left of the Alkyl Phenol Ethoxylates name. Please supply any additional information (generic/ class identification, max amount, and units) that is available. If Alkyl Phenol Ethoxylates are present, please indicate the type.

Metallo-organic Compounds - Indicate Type – Please use the codes listed (C, P, T, or X) to indicate the concentration range of any Metallo-organic Compounds, including but not limited to organic compounds of tin, that are added to the product or are known to be present in the product. Enter the codes in the box to the left of the Metallo-organic Compounds name. Please supply any additional information (generic/ class identification, max amount, and units) that is available. If Metallo-organic Compounds are present, please indicate the type.

Long-Chain Perfluorinated acids such as PFOS (perfluorooctane sulfonate), PFHxS (perflurohexane sulfonate), or PFOA (perfluorooctanoic acid) or substances that may degrade to form them - Indicate type

– Please use the codes listed (C, P, T, or X) to indicate the concentration range of any Long-Chain Perfluorinated acids that are added to the product or are known to be present in the product. Enter the codes in the box to the left of the Long-Chain Perfluorinated acids name. Please supply any additional information (generic/ class identification, max amount, and units) that is available. If Long-Chain Perfluorinated acids are present, please indicate the type.

Halogenated solvents - Indicate type– Please use the codes listed (C, P, T, or X) to indicate the concentration range of any Halogenated solvents, including but not limited to fluorinated, chlorinated, or brominated organic compounds, that are added to the product or are known to be present in the product. Enter the codes in the box to the left of the Halogenated solvents name. Please supply any additional information (generic/ class identification, max amount, and units) that is available. If Halogenated solvents are present, please indicate the type.

#### **SECTION IV. PHYSICAL PROPERTIES DATA**

In Section IV, ranges of values may be entered for the items requiring numeric data. If information is not available, please mark as “NE” (Not Evaluated).

Physical Form – Please record the physical form of the product. Examples include: gas, liquid, powder, paste, aerosol, etc.

Color – Please describe the general color of the product. Examples include white, brown, clear, etc.

Odor – Please describe the general odor of the product. Examples include ammonia-like, petroleum odor, etc.

Density – Please record the density of the product with units.

Flash Point (deg F/deg C) – Please record the flash point of the product with units. Please specify whether the method used to evaluate the flash point was “open cup” or “closed cup.”

Percent Volatiles – Please record the percent volatiles of the product with units.

pH (As Is/Conc.) – Please indicate the pH of the product. If the pH is expressed for the chemical as shipped, then note “As is.” If the pH is given for a certain dilution, please note the concentration. If the pH cannot be measured due the composition of the product, add “NA.”

Solubility in Water (g/L) – Please give the solubility in water, in g/L, if it is available.

## SECTION V. TOXICOLOGICAL INFORMATION

Please document any toxicological information that is available for the product. For items for which there is no information available, please mark as “NE” (Not Evaluated). The following abbreviations are used in this section:

LD<sub>50</sub> (Lethal Dose, 50%): the amount of a solid or liquid material that it takes to kill 50% of test subjects

LC<sub>50</sub> (Lethal Concentration, 50%): the concentration of a material in air that will kill 50% of test subjects

## SECTION VI. ENVIRONMENTAL DATA

Please document any environmental information that is available for the product. Ranges of values may be entered for the items requiring numeric data. If information is not available, please mark as “NE” (Not Evaluated). The following terms and abbreviations are used in this section:

BOD<sub>x</sub>:.....Biochemical Oxygen Demand, where x denotes the duration of the test in days

COD: ..... Chemical Oxygen Demand

TOC: ..... Total Organic Carbon

Bacteria Tox IC<sub>50</sub>:Bacterial Toxicity Inhibitory Concentration, 50%—the concentration of a toxicant which inhibits the respiratory activity of bacteria by 50%

ASRIT EC<sub>50</sub>:.... Activated Sludge Respiratory Inhibition Test, Effective Concentration 50%—the concentration of a toxicant which inhibits the respiration of activated sludge by 50%, performed by OECD Test No. 209.

## SECTION VII. REGULATORY INFORMATION - COMPONENT LEVEL

Total VOCs – At least one of the two Total VOC questions must be answered with a percentage value for the form to be considered complete:

Total VOCs by EPA Method 24/24A (%) – If available, please document the volatile organic compound percentage of the product, as analyzed by EPA Method [24/24A](#).

Total Solids by EPA Method 24/24A (%) – If available, please document the percentage of solids in the product, as analyzed by EPA Method 24/24A.

Total VOCs estimated based on product composition – If available, please document the volatile organic compound percentage of the product, determined as the sum of all component volatile organic compounds. The term VOC is defined in [40 CFR 51.100\(s\)](#). Please ensure that all volatile organic compounds that may be emitted during use of the product are accounted for in the estimate.

In the table in Section VII, list the names of all chemicals added to or known to be present in the product that are regulated under any of the regulations listed as column headings in the table. For each chemical listed, please provide an answer for each column. Use the appropriate codes, as listed below, to answer the questions. Please do not use the codes “NK”, “NA”, or “NE” in the table. The following is a description of the information required for each column:

Regulated Components – In this column, please list the chemical names of all components regulated under the specified laws.

CAS # – In this column, please list the Chemical Abstract System (CAS) Number for each regulated component. If the CAS number is proprietary, please write “proprietary.”

Max Wt. % – In this column, please list the maximum weight percent of each regulated component. Less than symbols (<) may be used to indicate that the percentage is not exact. Please do not use “>” symbols or ranges.

Column 1: AAFA RSL – In this column, please indicate with a “Y” or an “N” whether the component is listed on the American Apparel and Footwear Association (AAFA) Restricted Substances List (RSL). The most recent release of this list can be found on the AAFA Restricted Substances web page:

<https://www.wewear.org/industry-resources/restricted-substances-list/>

Column 2: CAA HAP – In this column, please indicate with a “Y” or an “N” whether the component is a Hazardous Air Pollutant under the US Clean Air Act (CAA). Information concerning Hazardous Air Pollutants can be found on the EPA’s [Air Toxics website](#). Please note that there is no regulatory de minimus level for HAPs, so any amount should be identified.

Column 3: CAA VOC – In this column, please indicate with a “Y” or an “N” whether the component meets the definition of a Volatile Organic Compound (VOC). The term “VOC” is defined in [40 CFR 51.100\(s\)](#).

Column 4: Children’s Safety Product Act - In this column, please indicate with a “Y” or an “N” whether the component is lead or certain phthalates regulated by the [US Children’s Product Safety Information Act \(CPSIA\)](#) the [State of Washington Children’s Safe Product Act \(chemical list here\)](#), or the [State of Maine Children’s Product Safety Rule \(chemical list here\)](#).

Column 5: State TAP – In this column, please indicate whether the component is a Toxic Air Pollutant (TAP) in South Carolina or North Carolina. If the chemical is a TAP, please answer “SC,” “NC,” or “Both.” If the chemical is not a TAP in these states, please answer “None.” The



South Carolina TAP list can be found in [SC Standard 8](#). The North Carolina TAP list can be found on the [NC DNR website](#).

Column 6: CWA – In this column, please indicate with a “Y” or an “N” whether the component is a Toxic Pollutant under the Clean Water Act (CWA) as listed in [40 CFR 401.15](#), a CWA Priority Pollutant as specified in [40 CFR 423 Appendix A](#), or a CWA Hazard Chemical as specified in [40 CFR 116.4](#) and [117.3](#).

Column 7: CERCLA RQ – In this column, please enter the CERCLA Reportable Quantity (RQ) or Section 304 EHS RQ for the component, whichever is less. If the component does not have a Reportable Quantity under CERCLA or Section 304, please enter “None” rather than leave the column blank. CERCLA RQs can be found in [40 CFR 302.4](#). Section 304 RQs can be found in [40 CFR 355 Subpart D](#). Both can be found in the [EPA’s List of Lists](#). (Be aware that the List of Lists is current only to 2006.)

Column 8: SARA 302 EHS – In this column, please indicate with a “Y” or an “N” whether the component is an Extremely Hazardous Substance (EHS) under SARA Section 302. A list of EHSs can be found in [40 CFR 355 Subpart D](#) or the [EPA’s List of Lists](#). (Be aware that the List of Lists is current only to 2006.)

Column 9: SARA 313 – In this column, please indicate with a “Y” or an “N” whether the component is regulated under SARA Section 313. A list of SARA 313 chemicals can be found in [40 CFR 372 Subpart D](#) or the [EPA’s List of Lists](#). (Be aware that the List of Lists is current only to 2006.)

Column 10: CA PROP 65 – In this column, please indicate with a “Y” or an “N” whether the component is on the list of chemicals known to the State of California to cause cancer or reproductive toxicity (the Proposition 65 list). The Proposition 65 list can be found on the [State of California’s website](#).

Column 11: REACH SVHC – In this column, please indicate with a “Y” or an “N” whether the component is on the Candidate List of Substances of Very High Concern (SVHC) under REACH. The Candidate List can be found on the [ECHA website](#).

## SECTION VIII. METALS ANALYSIS

If information is available for the metals content of the product, please record it in this table. If data are not available, please enter “NE” for Not Evaluated. If a value is lower than the analytically method detection limit, enter the detection limit and write “LDL” in the data rationale column.

## SECTION IX. SUBMITTAL INFORMATION

*By putting your name to this VPEP you affirm that the information given on this form is complete and correct to the best of your knowledge and has been prepared in consultation with knowledgeable persons at the facility where this product was made. Please note that NTA merely provides the common VPEP format for the convenience of the trade but that you are solely responsible for the information you provide on the VPEP form.*

Submitted by – Please supply the name of the technical person completing the form.

Title – Please supply the title of the technical person completing the form.

Phone – Please supply a phone number for the person completing the form.

E-mail – If available, please supply an email address for the person completing the form.

Fax – If available, please supply a fax number for the person completing the form.

Date – Please supply the date that the form was completed.