

Appendix G2

**Dataset Received from S.C. Johnson & Son, Inc. in Support of
Cuellar et al. (2002) Poster Presentation**

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A FAMILY COMPANY

S.C. Johnson & Son, Inc.
Worldwide Consumer Products, RD & E
Global Safety Assessment and Regulatory Affairs, Product Toxicology
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September 3, 2004

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Christina,

Hi! How are you? I am happy to be submitting the data on benchmark and fragrance formulations, which were partially discussed in the poster citation listed below:

Cuellar, N., Merrill, J.C., Clear, M.L., Mun G., and Harbell J.W. 2002. The application of benchmarks for the evaluation of the potential ocular irritancy of aerosol fragrances. *The Toxicologist* 66(1-S): 243-244.

Included with this submission are the following documents:

1. Cover letter
2. Data spreadsheet
3. Fragrance graphs
4. Coded formula spreadsheet

Study Protocols:

Standard Draize protocol was used for 4 of the in-vivo studies. The EPA aerosol protocol was used for test material #3. Standard BCOP protocol was used for the in-vitro work at IIVS. BCOP exposure times were 3 and 10 minutes with post exposure of 2 hours.

Formula Spreadsheet:

The formulas listed in this spreadsheet are coded similarly to past submissions. For benchmarks, test material number is the unique sample number whereas the group description is referenced in the poster as type of benchmark. Test material #3 and #4 (Alcohol-based benchmark) is not listed in the poster. For fragrance formulas, test material denotes the category (formula) whereas the group describes the formula form (i.e aerosol vs membrane (gel)). Fragrances formulas are referenced in the poster. For both benchmarks and formulations, raw materials are listed followed by their percentages.

Poster:

Benchmark poster not included. John Harbell previously sent it to you.

Graphs:

Graphs plot the BCOP total score per each unique fragrance formulation. Graphs include reference benchmarks (see formula spreadsheet) and the ethanol control. The bars show one standard deviation from the mean value for each benchmark and the ethanol. Please note that the ethanol values displayed on the 3-minute exposure graphs are for a 3-minute exposure to ethanol (not the 10-minute exposure ethanol that was performed as the positive control). There are 9 tabs in this spreadsheet. Graphs are labeled per form ((2 for aerosol and 2 for membrane (gel)) and exposure time (3 or 10 minutes) in tabs 1-8. The first two graphs refer to the aerosol formulas and the second two graphs refer to the membrane. Each graph includes the corresponding raw data in the next tab. There are 44 aerosol formulas depicted in the aerosol graphs and 36 membrane formulas depicted in the membrane graphs. The final tab describes the basic statistics on the ethanol control and each benchmark by exposure time.

Data Worksheet:

The data worksheet consists of 4 tabs at the bottom of the page. We are including all tabs to clearly demonstrate how we analyzed the data into the GHS and EPA categories in the summary spreadsheet shown in tab #4.

Summary spreadsheet:

The summary spreadsheet is sorted by test material. The test material number refers to the benchmark formula or ethanol listed in the formula spreadsheet. GHS and EPA categories are in the next 8 columns in yellow. The last 2 columns consist of the mean BCOP total scores (3 and 10 minute) in blue. EPA and GHS criteria are summarized in this spreadsheet.

Data was analyzed per formula. Raw data scores from the first three days and days to clear per each of 6 rabbits were randomly put into combinations of three and categorized accordingly based on EPA or GHS criteria. This analysis resulted in a total of 20 combinations per formula. Each combination was listed in the appropriate GHS or EPA category. Scoring assumptions are also listed in this spreadsheet based on protocol differences.

Protocol used for the BCOP assay was the same for all benchmarks and ethanol formulas. In-vivo studies were conducted using the standard Draize protocol with the exception of the ethanol/fragrance benchmark. The ethanol/fragrance benchmark utilized the EPA aerosol dosing Draize protocol.

The ethanol/fragrance benchmark is used to evaluate specific aerosol formulations. This benchmark shows that even though the formulation would be irritating in the standard Draize Assay, the product is provided in a form that restricts exposure to the aerosol route by limiting exposure via a metered dose. The metered dosing approach demonstrates that new formulations would not exceed the irritation potential of the benchmark.

As shown in the graphs and the summary table, the BCOP is able to rank irritation of a variety of formulations in comparison to the benchmarks. Severe irritants can be identified using this methodology. The fragrance level in the formula does impact the irritation potential of the formula.

These data demonstrate the importance of assessing all new formulations relative to an appropriate fixed benchmark.

If you have any questions or comments on this data set, please feel free to contact either Judith Swanson or myself at the following:

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Sincere regards,



Nicole Cuellar
Sr. Research Toxicologist

In Vivo Data - S.C. Johnson Submission Dated September 3, 2004

Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA			CHEMOSIS	DISCHARGE		
0.1	F38948	#1	24	1	2	1	2	2	2	27	EPA
			48	1	1	0	2	1	0	11	14
			72	1	1	0	0	1	0	7	GHS
			7 days	0	0	0	2	0	0	4	14
			14 days	0	0	0	0	0	0	0	
			21 days							0	
GHS Tissue	F38948	#1	27	1.0	1.3	0.3	1.3	1.3	0.7	14	14
	ANIMAL ID										
Summary block used analysis of the twenty combinations	1	#1	27	1.0	1.3	0.3	1.3	1.3	0.7	14	14
	2	#1	34	0.7	1.3	0.3	2.3	1.3	0.7	14	14
	3	#1	37	0.7	2.0	0.3	2.0	1.3	0.7	7	14
	4	#1	35	1.0	2.3	1.0	2.0	1.3	0.3	7	14
	5	#1	39	1.0	2.7	1.0	2.7	1.3	2.0	14	14
	6	#1	30	1.0	1.7	1.0	2.7	1.3	0.3	14	14
	Dose Vol	0.1									

Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR	
				OPACITY	AREA			CHEMOSIS	DISCHARGE			
0.1	R2266	#2	24	0	0	0	1	0	0	2	EPA	
			48	0	0	0	0	0	0	0	0	
			72									GHS
			7 days								0	2
			14 days								0	
			21 days								0	
GHS Tissue	R2266	#2	2	0.0	0.0	0.0	0.5	0.0	0.0	0	2	
	ANIMAL ID											
Summary block used analysis of the twenty combinations	1	#2	2	0.0	0.0	0.0	0.5	0.0	0.0	0	2	
	2	#2	2	0.0	0.0	0.0	0.5	0.0	0.0	0	2	
	3	#2	4	0.0	0.0	0.0	0.7	0.3	0.0	0	3	
	4	#2	2	0.0	0.0	0.0	0.7	0.0	0.0	0	3	
	5	#2	2	0.0	0.0	0.0	0.7	0.0	0.0	0	3	
	6	#2	4	0.0	0.0	0.0	0.7	0.7	0.0	0	3	
	Dose Vol	0.1										

In Vivo Data - S.C. Johnson Submission Dated September 3, 2004

Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR	
				OPACITY	AREA			CHEMOSIS	DISCHARGE			
0.1	F38951	#1	24	1	4	1	2	2	1	35	EPA	
			48	1	2	1	2	1	0	21	7	
			72	1	1	1	2	1	0	16	GHS	
			7 days	0	0	0	1	0	0	2	14	
			14 days	0	0	0	0	0	0	0		
			21 days							0		
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA	DIC GHS	
	F38951	#1	35	1	2.333333	1	2	1.333333333	0.333333333	7	14	
	Combinatio Opacity			Iris	Redness	Chemosis	DIC EPA	DIC GHS	Combinations	Opacity	Iris	
Combina- tion block #4	2,3,6	0.8	0.7	2.5	1.3	14	14	Combina- tion block #5	3,4,5	1.0	1.0	
	GHS Rating	4	4	2	4	14	14	GHS Rating		2	4	
	2,4,5	1.0	1.0	2.5	1.3	14	14	3,4,6		1.0	1.0	
	GHS Rating	2	4	2	4	14	14	GHS Rating		2	4	
	2,4,6	1.0	1.0	2.5	1.3	14	14	3,5,6		1.0	1.0	
	GHS Rating	2	4	2	4	14	14	GHS Rating		2	4	
	2,5,6	1.0	1.0	2.7	1.3	14	14	4,5,6		1.0	1.0	
GHS Rating	2	4	2	4	14	14	GHS Rating		2	2		
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA	DIC GHS	
0.1	R2299	#2	24	0	0	0	1	0	0	2	EPA	
			48	0	0	0	1	0	0	2	0	
			72	0	0	0	0	0	0	0	GHS	
			7 days								0	3
			14 days								0	
			21 days								0	
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA	DIC GHS	
	R2299	#2	2	0	0	0	0.66666667	0	0	0	3	
	Combinatio Opacity			Iris	Redness	Chemosis	DIC EPA	DIC GHS	Combinations	Opacity	Iris	
Combina- tion block #4	2,3,6	0.0	0.0	0.7	0.5	0	3	Combina- tion block #5	3,4,5	0.0	0.0	
	GHS Rating	4	4	4	4	0	3	GHS Rating		4	4	
	2,4,5	0.0	0.0	0.7	0.0	0	3	3,4,6		0.0	0.0	
	GHS Rating	4	4	4	4	0	3	GHS Rating		4	4	
	2,4,6	0.0	0.0	0.7	0.3	0	3	3,5,6		0.0	0.0	
	GHS Rating	4	4	4	4	0	3	GHS Rating		4	4	
	2,5,6	0.0	0.0	0.7	0.3	0	3	4,5,6		0.0	0.0	
GHS Rating	4	4	4	4	0	3	GHS Rating		4	4		

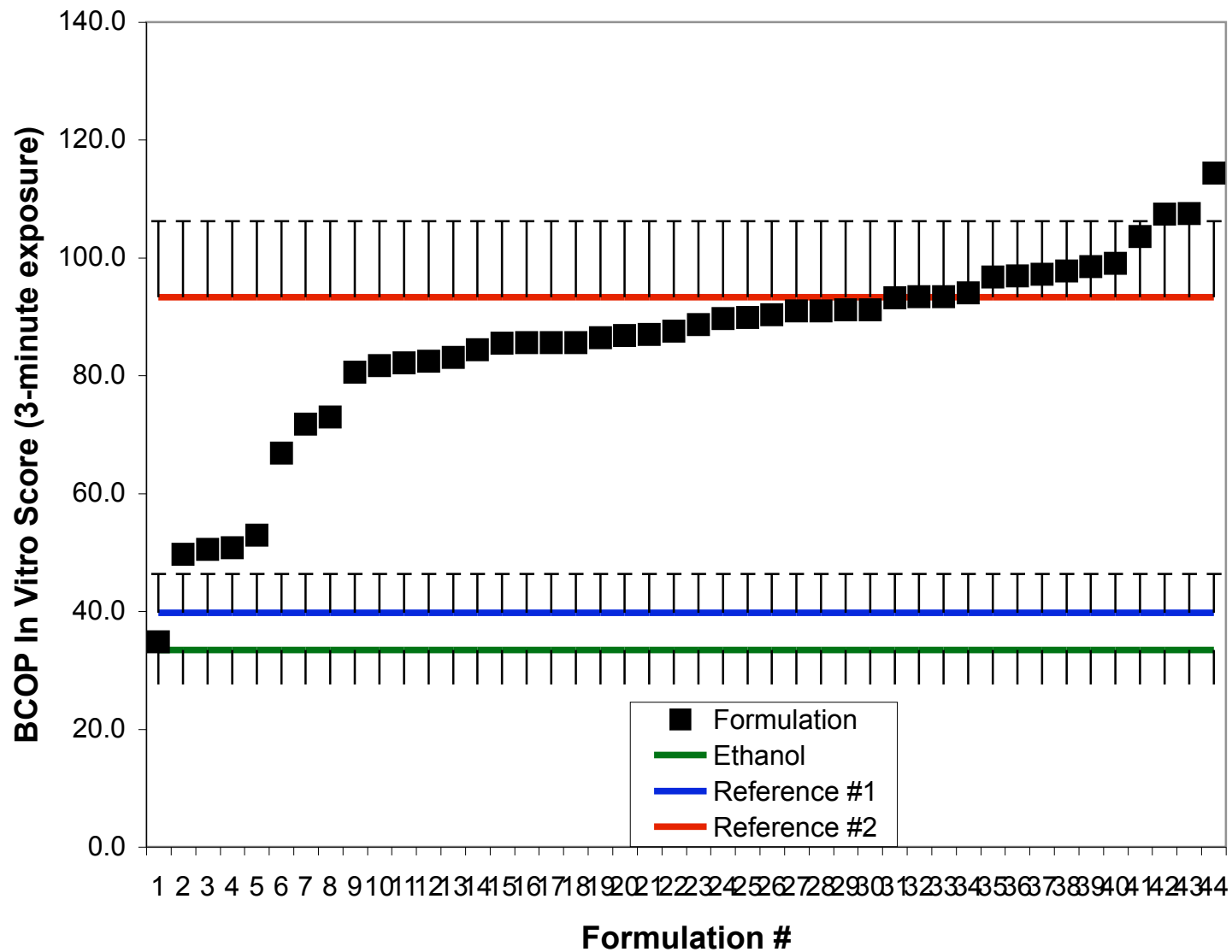
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Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO- CLEAR	
				OPACITY	AREA			CHEMOSIS	DISCHARGE			
0.1	F38952	#1	24	1	4	1	2	2	3	39	EPA	
			48	1	3	1	3	1	2	32	14	
			72	1	1	1	3	1	1	20	GHS	
			7 days	1	1	0	1	1	0	9	14	
			14 days	0	0	0	0	0	0	0		
			21 days							0		
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA	DIC GHS	
	F38952	#1	39	1	2.666667	1	2.6666667	1.333333333	2	14	14	
Redness	Chemosis	DIC EPA	DIC GHS									
2.3	1.3	14	14				Summary	1,2,3	2	14		
2	4	14	14				#1	1,2,4	2	14		
2.3	1.3	14	14					1,2,5	2	14		
2	4	14	14					1,2,6	2	14		
2.7	1.3	14	14					1,3,4	2	14		
2	4	14	14					1,3,5	2	14		
2.7	1.3	14	14					1,3,6	2	14		
2	4	14	14					1,4,5	2	14		
2.7	1.3	14	14					1,4,6	2	14		
2	4	14	14					1,5,6	2	14		
									2	14		
Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO- CLEAR	
				OPACITY	AREA			CHEMOSIS	DISCHARGE			
0.1	R2275	#2	24	0	0	0	1	0	0	2	EPA	
			48	0	0	0	1	0	0	2	0	
			72	0	0	0	0	0	0	0	0	GHS
			7 days								0	3
			14 days								0	
			21 days								0	
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA	DIC GHS	
	R2275	#2	2	0	0	0	0.6666667	0	0	0	3	
Redness	Chemosis	DIC EPA	DIC GHS									
0.7	0.2	0	3				Summary	1,2,3	4	3		
4	4	0	3				#2	1,2,4	4	3		
0.7	0.5	0	3					1,2,5	4	3		
4	4	0	3					1,2,6	4	3		
0.7	0.5	0	3					1,3,4	4	3		
4	4	0	3					1,3,5	4	3		
0.7	0.3	0	3					1,3,6	4	3		
4	4	0	3					1,4,5	4	3		
								1,4,6	4	3		
								1,5,6	4	3		

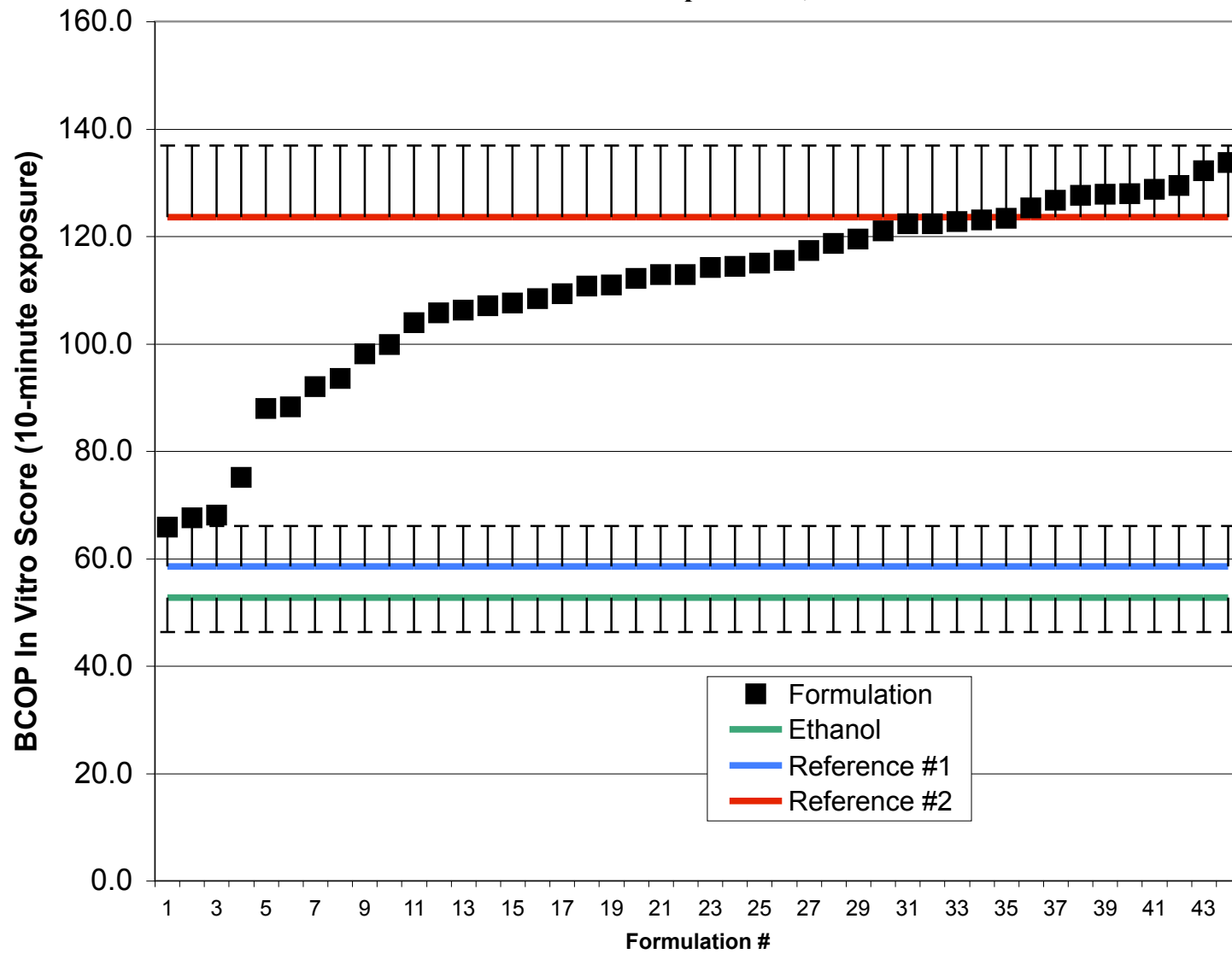
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Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR	
				OPACITY	AREA			CHEMOSIS	DISCHARGE			
0.1	F38953	#1	24	1	3	1	2	2	1	30	EPA	
			48	1	1	1	3	1	0	18	14	
			72	1	1	1	3	1	0	18	GHS	
			7 days	0	0	0	2	1	0	6	14	
			14 days	0	0	0	0	0	0	0	0	
			21 days						0			
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DtC EPA	DtC GHS	
	F38953	#1	30	1	1.666667	1	2.66666667	1.333333333	0.333333333	14	14	
14		2,3,4		2	14							
14		2,3,5		2	14							
14		2,3,6		2	14							
14		2,4,5		2	14							
14		2,4,6		2	14							
14		2,5,6		2	14							
14		3,4,5		2	14							
14		3,4,6		2	14							
14		3,5,6		2	14							
14		4,5,6		2	14							
	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR	
				OPACITY	AREA			CHEMOSIS	DISCHARGE			
0.1	R2267	#2	24	0	0	0	1	1	0	4	EPA	
			48	0	0	0	1	1	0	4	0	
			72	0	0	0	0	0	0	0	GHS	
			7 days								0	3
			14 days								0	
			21 days						0			
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DtC EPA	DtC GHS	
	R2267	#2	4	0	0	0	0.66666667	0.66666667	0	0	3	
0		2,3,4		4	3							
0		2,3,5		4	3							
0		2,3,6		4	3							
0		2,4,5		4	3							
0		2,4,6		4	3							
0		2,5,6		4	3							
0		3,4,5		4	3							
0		3,4,6		4	3							
0		3,5,6		4	3							
0		4,5,6		4	3							

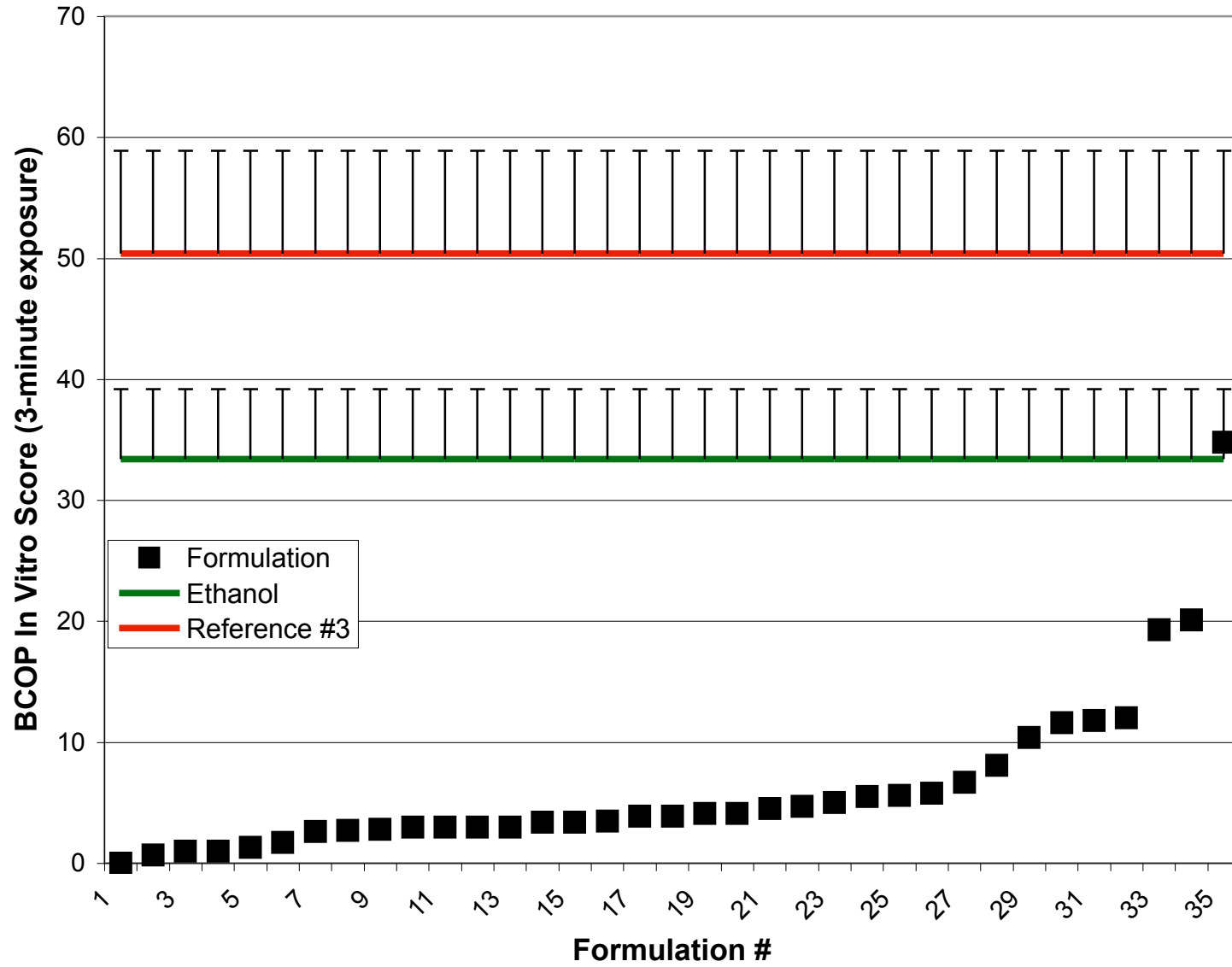
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SC Johnson Submission
Dated September 3, 2004



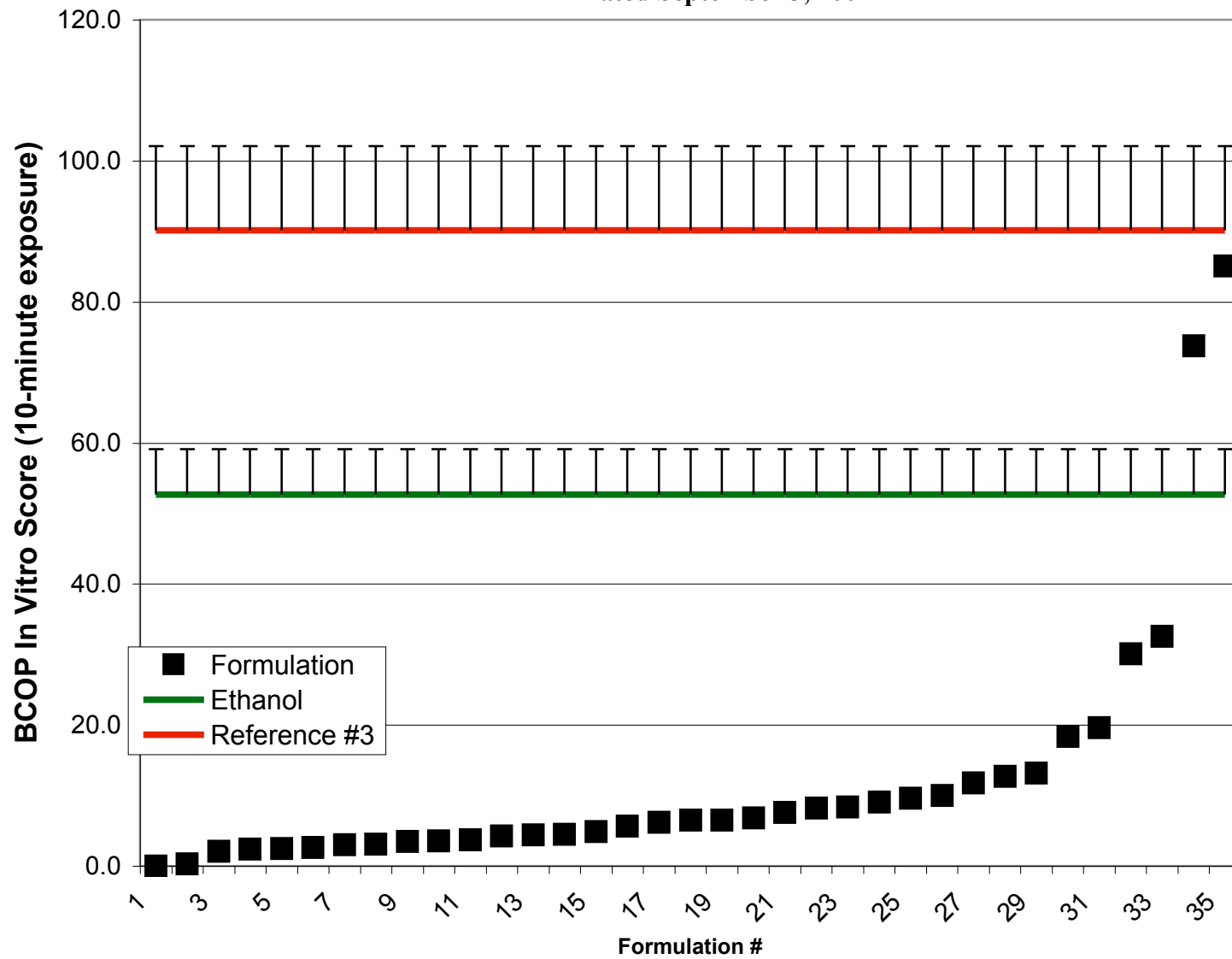
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**BCOP Data for SC Johnson Submission
Dated September 3, 2004**

Ethanol	3-minute exposure			
		Opacity	OD490	In Vitro Score
	Mean	21.1	0.820	33.4
	STD	2.9	0.238	5.8
	CV	13.7%	29.0%	17.5%
	n=7			
Ethanol	10-minute exposure (normal positive control)			
		Opacity	OD490	In Vitro Score
	Mean	31.2	1.422	52.7
	STD	4.8	0.345	6.4
	CV	15.3%	24.3%	12.1%
	n = 632			
	Oct 1997 to the present			
Reference #1	Alcohol-based benchmark		Used as the first benchmark formulation	
	3-minute exposure		for the aerosol formulations	
		Opacity	OD490	IV Score
	Mean	20.6	1.270	39.7
	STD	3.5	0.308	6.6
	CV	16.8%	24.2%	16.7%
	n=21			
	10-minute exposure			
		Opacity	OD490	IV Score
	Mean	28.6	2.001	58.5
	STD	4.1	0.415	7.6
	CV	14.3%	20.7%	13.0%
	n=43			
Reference #2	Ethanol Fragrance benchmark			
	3-minute exposure			
		Opacity	OD490	IV Score
	Mean	53.7	2.6	93.3
	STD	8.5	0.5	12.9
	CV	15.8%	20.0%	13.8%
	n=32			
	10-minute exposure			
		Opacity	OD490	IV Score
	Mean	81.5	2.805	123.6
	STD	11.9	0.520	13.3
	CV	14.6%	18.5%	10.8%
	n=32			
Reference #3	Fragrance benchmark (no ethanol)			
	3-minute exposure			
		Opacity	OD490	IV Score
	Mean	39.9	0.693	50.4
	STD	6.0	0.238	8.5
	CV	14.9%	34.3%	16.8%
	n=84			
	10-minute exposure			
		Opacity	OD490	IV Score
	Mean	61.0	1.941	90.1
	STD	7.9	0.459	12.0
	CV	12.9%	23.7%	13.3%
	n=90			

FORMULAS

Test Material #	Group	Raw Material	Percentage
1	Fragrance Benchmark (Reference #3)	Fragrance Thickener	95-100 0-5
2	Ethanol/ Fragrance Benchmark (Reference #2)	Ethanol Fragrance	70-75 25-30
3, 4	Alcohol-based Benchmark (Reference #1)	Alcohol Active Dimethicone	85-90 10-15 1-5
5	Ethanol	Fragrance Ethanol	< 1 100
Fragrance Formulas	Membrane Formula	Fragrance Thickener	95-100 0-5
Fragrance Formulas	Aerosol Formula-1 ¹	Alcohol Fragrance	70-75 25-30
Fragrance Formulas	Aerosol Formula-2	Alcohol Fragrance	80-85 15-20
Fragrance Formulas	Aerosol Formula-3	Alcohol Fragrance	90-95 5-10

¹Most aerosol formulas fall within this category