



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

July 11, 2011.

DP BARCODE: 391192.  
MRID: N/A  
SUBJECT: **Puma.**  
REG. NO. OR FILE SYMBOL: 5813-100  
DOCUMENT TYPE: Product Chemistry Review  
Manufacturing-use  OR End-use Product   
INGREDIENTS (PC Codes) Sodium Hypochlorite Solution. (014 703)



CAS Number (7681-52-9)  
TEST LAB: The Clorox Technical Center.  
SUBMITTER: The Clorox Company.  
GUIDELINE: NA.  
COMMODITIES: Formulation.  
REVIEWER: Salvador Rodríguez  
ORGANIZATION: AD  
APPROVER: Karen P. Hicks  
APPROVED DATE: 07/13/11.



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OFFICE OF  
PREVENTION,  
PESTICIDES AND  
TOXIC SUBSTANCES

July 11, 2011.

**MEMORANDUM**

**Subject:** Product Chemistry Review for EPA Reg. # 5813-100.

**From:** Salvador Rodríguez, Chemist  
Product Science Branch, CT Team  
Antimicrobials Division (7510P)

**Thru:** Karen P. Hicks, CT Team Leader  
Product Science Branch  
Antimicrobials Division (7510P)

*Juan Negro*  
*for*  
*Karen P. Hicks*  
*7/13/11*

**To:** Wanda Henson / Thomas Luminello  
PM Team 32  
Antimicrobials Division (7510P)

**APPLICANT:** The Clorox Company.

**Action code:** 362.

**Due Date:** 09/13/11.

**Due date:**  
**Product Formulation**  
**Active Ingredient(s)**

**% by wt.**

Sodium Hypochlorite.....8.25

## **BACKGROUND:**

The Clorox Company, has submitted this amendment to support the registration for the fungicide, bacteriocide, and virucide non-integrated end-use product **Puma**. The registrant is updating the suppliers and adding two producers. In addition they are changing the formulation for the anti-yellowing and adding an additional ingredient. The Product Chemistry Reviewer has received the following documents:

- Application for pesticide amendment, dated 06/10/11.
- Letter of justification, dated 01/12/11, for the use of wider certified limits.
- Confidential Statements of Formula (CSFs), dated 06/13//11, for the basic and alternative #s (A01, A02, A03, & A04) formulations.
- Study title: "Clorox Formula F2009.0092 – Preliminary Analysis" MRID # 484292-01

## **FINDINGS:**

1. The CSFs dated, 06/13/11, for the basic and alternates #s (A01, A02, A03, & A04) are revised.
2. The CSFs and the label have the same nominal
3. The certified limits listed in 40 CFR do not meet the EPA standard certified limits. The registrant has indicated that a higher upper and lower limit has been requested to ensure that the active ingredient (AI) concentration remains above the lower certified limit over the shelf of the product. This wider certified limits have been accepted on 05/25/10.
4. The registrant strongly believes that the wider certified limits under this formulation do not compromise the product in any way and do not pose any threat to the public health,

## **CONCLUSIONS:**

The Confidential Statements of Formula (CSFs), dated 06/13/11, for the basic and alternates #s (A01, A02, A03, & A04) formulations are acceptable. The letter of justification for the use of wider limits meets the EPA Standards.