



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

June 27, 2011.

DP BARCODE: 389303.  
MRID: 484292-00, 484292-01.  
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: EPA OPPTS 830.1700 Group "A".  
COMMODITIES: Formulation.  
REVIEWER: Salvador Rodríguez  
ORGANIZATION: AD  
APPROVER: Karen P. Hicks  
APPROVED DATE: 06/28/11.



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OFFICE OF  
PREVENTION,  
PESTICIDES AND  
TOXIC SUBSTANCES

June 27, 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)

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

**APPLICANT:** The Clorox Company.

**Action code:** 307.

**Due Date:** 07/22/11.

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

**% by wt.**

Sodium Hypochlorite.....8.25

## **BACKGROUND:**

The Clorox Company, has submitted the study OPPTS Guideline 830.1700, "Preliminary Analysis" required to support the registration for the fungicide, bacteriocide, and virucide non-integrated end-use product **Puma**. The registrant is submitting the study clorox formula F2009.0092, "Preliminary Analysis" MRID # 484292-01. The Product Chemistry Reviewer has received the following documents:

- A transmittal letter, dated 03/23/11.
- Application for pesticide amendment, dated 03/23/11.
- Confidential Statement of Formula (CSF), dated 03/03/11, for the basic formulation.
- Study title: "Clorox Formula F2009.0092 – Preliminary Analysis" MRID # 484292-01

## **FINDINGS:**

1. The OPPTS Group A product chemistry guideline 830.1700 data requirements applicable to end-use products have been met. MRID # 484292-01.
2. The CSF and the label have the same nominal.
3. All certified limits meet the EPA Standard Certified Limits.
4. The Confidential Statement of Formula (CSF), dated 03/03/11, for the basic is used as reference.
5. A statement of Good Laboratory Practice (GLP) compliance was provided for the study assigned MRID # 484292-01. It is stated that the physical/ chemical characterizations were conducted in accordance with GLP standards (40 CFR Part 160).
6. The registrant indicated that five pilot-scale batches for the Puma product, were selected for performing the Preliminary Analysis Study. Using the Enforcement Analytical Method, samples were analyzed in duplicate and average of the two readings was used to express the weight % active ingredient (AI) in each sample. The results are the following:

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LOT	% Wt. Sodium Hypochlorite
09PUMA6	8.01
09PUMA7	8.06
09PUMA8	8.16
09PUMA9	8.11
09PUMA10	8.15

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**CONCLUSIONS:**

The OPPTS Series 830.1700 "Preliminary Analysis" required for end-use products has been met. The five batches preliminary Analysis Study is acceptable. The results of the five batch analysis study indicates that the concentration of the active ingredient (AI) is within the EPA Standard Certified Limits.