



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND  
TOXIC SUBSTANCES

September 25, 2000

NOTE TO PM 03 Ann Sibold

SUBJECT: Self Certification to Compliance with Child-Resistant Packaging  
Regulations Per PR Notice 96-2 For Clorox

Please note that EPA FILE NO: 64240-32 CRP certifications regarding child-resistant packaging (CRP) based on studies 99-12 and 13 have been reviewed **and are acceptable** regarding compliance with the standards of 40 CFR 157.32. The 8/11/2000 CRP certifications are acceptable but only for a product life of 3 months or less. The product label is for a 12 month time period. Therefore a new CRP certification citing 99-14 along with studies 99-12 and 99-13 is required for the 12 month product life to be a pass of the child test according to the sequential test chart in 16 CFR 1700.20. However, based on the way studies 99-12 and 99-13 were conducted a discussion of self-certification with the registrant is possible. Please arrange an intragency discussion of this issue followed by one with the registrant.

Please place a copy of this note and the CRP certifications in the registration jacket for the above named product. Additionally please advise the registrant that these CRP certifications are acceptable. If you have any questions please contact me at (703)-308-7368.

*Rosalind L. Gross*  
Rosalind L. Gross

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