

37982-20007

10/17/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Washington, D.C. 20460

October 17, 2008

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Cristina Griffin
Agent for Olin Corporation
c/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: Sodium Hypochlorite 12.5%
EPA Registration No. 37982-20007
Application Date: September 29, 2008
Receipt Date: October 1, 2008

Dear Ms. Griffin:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- Addition of Note To Physician to First Aid Statement
Addition of toll free number to First Aid Statement
Addition of address to label
Addition of statement clarifying that product is not a pesticide MUP

General Comments

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.


Sincerely,

Wanda Y. Henson
Product Reviewer (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Table with columns for BOL and NAME, containing handwritten initials and names like 'EK Berg' and 'Henson'.

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060.

 EPA	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number NOTIF
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Application for Pesticide - Section I

1. Company/Product Number 37982-20007	2. EPA Product Manager Emily Mitchell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Olin Corporation/ Sodium Hypochlorite 12.5%	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Olin Corporation c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - explain below.
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to add non pesticidal language

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material this Product will be Packaged in:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted.		If "Yes," Unit Package wgt. No. per container	If "Yes," Unit Package wgt. No. per container

3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container	5. Location of Label Direction <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner In Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		

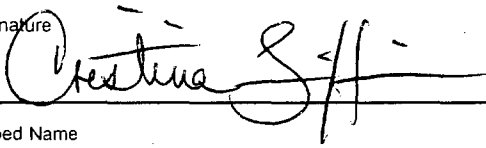
Section - IV

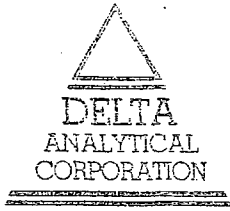
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Cristina Griffin	Title Agent for Olin Corporation	Telephone No. (Include Area Code) 301-680-7971
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Certification

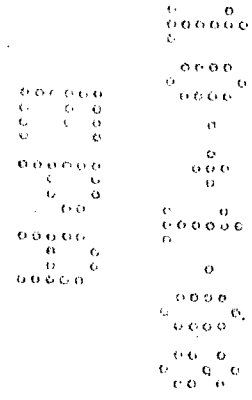
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Agent for Olin Corporation	6. Date Application Received (Stamped)
4. Typed Name Cristina Griffin	5. Date September 29, 2008	



August 1, 2008

Document Processing Desk (NOTIF)
 Office of Pesticide Programs (7504P)
 Environmental Protection Agency
 One Potomac Yard
 2777 S. Crystal Drive, Room S-4900
 Arlington VA 22202



Attn: Emily Mitchell, PM 32/ Wanda Henson

RE: Notification to add non pesticidal language and correct errors identified by California DPR
Product: Sodium Hypochlorite -12.5
Company: Olin Corporation, EPA Reg. No.: 72315-6

Dear Ms. Mitchell:

On behalf of Olin Corporation, I am submitting a notification. Each label change is discussed below:

1) We are changing a non-FIFRA element of the Directions for Use for Olin's sodium hypochlorite label. The non pesticidal language was provided by EPA's Michael Hardy and is shown highlighted on page 2 of the label. We are enclosing the email from Mr. Hardy.

Changes requested by California DPR:

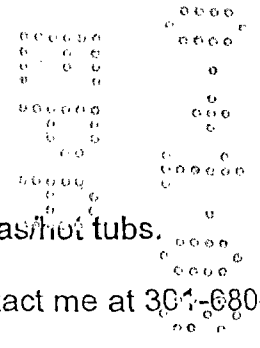
2) Correct error: We are correcting an inadvertent omission of language by adding the sentence: "Do not get in eyes, skin, or clothing." California DPR pointed out the omission and stated that since the wording is required on this type of label based on the RED, a notification to EPA is appropriate. (See Page 1 of the label, change is highlighted.)

3) Correct error: EPA's letter of 4/26/07 (enclosed) instructed Olin to revise the spa/hot tub language to say that "Re-entry into treated spas/hot tubs is prohibited at levels above 5 ppm due to risk of bodily harm." The language was changed in one paragraph, but the following sentence was not changed: "Do not enter spa until chlorine residual is 1-3 ppm" so the instructions were inconsistent. We have corrected the error by deleting the "1-3 ppm" sentence and inserting the 5 ppm language. (See page 1 of the booklet, old sentence is deleted with strikeout and new sentence is highlighted. New sentence matches the last sentence on the same page)


4) We have added "(Not Approved for Use in California)" for two uses, as directed by California DPR.

Enclosures

- EPA form 8570-1
- 1 copy of revised label with change highlighted
- Michael Hardy email dated 7/28/08
- Copy of EPA letter of 4/26/07 showing ppm change for spas/hot tubs.



If you have any questions regarding this submission, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely, -

 Cristina Griffin
 Agent for Olin

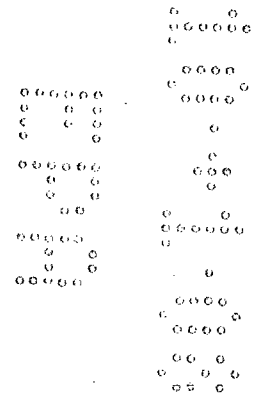
Enclosures

cc: Vickie Ray, Olin Corporation



September 29, 2008

Document Processing Desk (NOTIF)
 Office of Pesticide Programs (7504P)
 Environmental Protection Agency
 One Potomac Yard
 2777 S. Crystal Drive, Room S-4900
 Arlington VA 22202



Attn: Emily Mitchell, PM 32

RE: Notification of minor label changes
Sodium Hypochlorite 12.5%
EPA Reg. No. 37982-20007

Company: Pioneer Americas, LLC, D/B/A Olin Chlor Alkali Products

Dear Ms. Mitchell:

On behalf of Pioneer Americas, LLC, D/B/A Olin Chlor Alkali Products, I am submitting a notification for Sodium Hypochlorite 12.5% EPA REG. NO.: 37982-20007. This notification is for the same non-pesticidal explanatory language which EPA approved for Olin's EPA Reg. No. 72315-6. For your convenience, I have enclosed a copy of the notification approval letter/explanation of changes for 72315-6 and the e-mail from Michael Hardy providing the non-pesticidal language. In addition, there are a couple of other minor label changes also consistent with the EPA approved Reg. No. 72315-6; all changes on the label are highlighted.

In addition, we have reformatted the label slightly to fit it onto fewer pages to resemble other Olin labels and have made a couple of other minor label changes also consistent with the EPA approved Reg. No. 72315-6; all changes on the label are highlighted.

Please note: EPA's public label database should reflect the Company name change.

Enclosures

- EPA form 8570-1
- 1 copy of revised label with all changes highlighted
- Michael Hardy-email dated 7/28/08
- EPA approval letter of 8/19/08 and notification explanation for EPA Reg. No. 72315-6
- Copy of EPA approval letter for Company Name Change

If you have any questions regarding this submission, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,


Cristina Griffin
 Agent for Pioneer Americas, LLC, D/B/A Olin Chlor Alkali Products

Enclosures

cc: Vickie Ray, Olin Corporation

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SODIUM HYPOCHLORITE 12.5% FOR MANUFACTURING USE

ACTIVE INGREDIENT – Sodium Hypochlorite	12.5%
OTHER INGREDIENTS	87.5%
TOTAL	100.0%

EPA REG. NO 37982-20007

EPA Est. Nos. : 72315-AL-001, 72315-GA-001, 72315-NY-001, 72315-TN-001, 71207-CAN-002, 61667-CA-001, 61667-CA-002, 61667-LA-001, 61667-NV-001

See Bill of Lading for specific establishment number

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
Call a poison control center or doctor immediately for treatment advice. Have the product container or label with you when you call a poison control center or doctor, or when going for treatment.	
If in eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye.
If on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes.
If swallowed	<ul style="list-style-type: none"> Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	
OCEAN® NETWORK EMERGENCY PHONE 1-888-289-1911	
Pioneer Americas, LLC D/B/A Olin Chlor Alkali Products 490 Stuart Road, NE Cleveland, TN 37312 [phone number]	

See other precautions on this label.

NET CONTENTS - [See Bill of Lading]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, may cause severe skin and eye irritation or chemical burns to broken skin. Causes eye damage. May be fatal if swallowed. Avoid breathing vapors. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling this product. Wash after handling. Vacate poorly ventilated areas as soon as possible. Do not return until odors have dissipated.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharges. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT: Use only according to label directions. Mixing this product with gross filth, such as feces, urine, etc. or with ammonia, acids, detergents, or other chemicals will release hazardous gases which are irritating to eyes, lungs and mucous membranes.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

FOR MANUFACTURING USE ONLY

Reformulators and Repackagers of this product must obtain their own pesticide registrations from the Environmental Protection Agency.

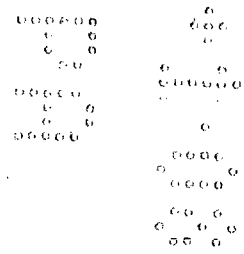
For manufacturing use only in the formulation of pesticidal end-use products intended as:

- Sanitizers of surfaces (e.g. wooden butcher blocks, stainless steel tops, concrete floors, tile walls); or
- Sanitizers of commercial and household laundry; or
- Agents to wash or assist in lye peeling of fruits and vegetables; or
- Agents to help control microorganisms on eggs for human consumption; or
- Disinfectants of poultry drinking water; or
- Disinfectants of human drinking water (emergency / public / individual), swimming pool water, Hubbard / immersion tank water, spas / hot tub, hydrotherapy pools, human drinking water systems (e.g. water mains); or
- Disinfectants of nonporous hard surfaces (e.g. tile, glass, stainless steel, fiberglass); or
- Agents to help control microorganisms in sewage, wastewater, industrial pulp and paper process water systems; or
- Algicide / slimicides in cooling towers or evaporative condensers; or
- Sanitizers of dialysis machines; or
- Sanitizers of toilet bowls; or
- Agents to help control algae and bacteria in fish and lobster ponds / tanks and conditioning oysters; or
- Agents to help control slime on boat bottoms; or
- Agents to sanitize and deodorize artificial sand beaches; or
- Agents to kill scavenger fish in fish hatchery ponds.

CLEANING FORMULATIONS, BLEACHING, & NON-PESTICIDE CHEMICAL MANUFACTURING: This product may be used for cleaning formulations, bleaching and non-pesticide chemical manufacturing. Only specifically designed handling and dispensing equipment should be used in accordance with manufacturer's instructions and according to operating instructions or product formulations defined by the use facility.

STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spills, flood areas with large quantities of water. If container required a deposit, return it to Pioneer or its distributor for a refund. If container is a "no deposit" container, then triple rinse and discard. Product or rinsate, which can not be used, should be diluted with water and discarded in a sanitary sewer. Do not contaminate food or feed by storage, disposal or cleaning of equipment.



Cristina Griffin

F Y I

From: Hardy.Michael@epamail.epa.gov
Sent: Monday, July 28, 2008 9:46 AM
To: cgriffin@delta-ac.com
Cc: Hartman.Mark@epamail.epa.gov; Mitchell.Emily@epa.gov; Henson.Wanda@epamail.epa.gov

Cristina,

Olin can add the following statement on their bleach product (72315-6) to avoid being confused as a pesticide MUP:

CLEANING FORMULATIONS, BLEACHING, & NON-PESTICIDE CHEMICAL MANUFACTURING: This product may be used for cleaning formulations, bleaching and non-pesticide chemical manufacturing. Only specifically designed handling and dispensing equipment should be used in accordance with manufacturer's instructions and according to operating instructions or product formulations defined by the use facility.

Michael Hardy
Ombudsman and Enforcement Team Leader
Antimicrobials Division
703-308-6432