UNITED STATES ENVIRONMENTAL PROTECTION ACTION



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

EPA Registration No. 72315-15

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

- Clarification to Precautionary Statements
- 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.

CONCURRENCES

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)

MBOL 75/0P 7570P

Form Apr~ Please read instructions on reverse before comple in form. wed. OMB No. 2070-0060. **OPP Identifier Number** United States □ Registration **EPA Environmental Protection Agency** ☐ Amendment Washington, DC 20460 NOTIF X Other Application for Pesticide - Section I 2. EPA Product Manager 3. Proposed Classification 1. Company/Product Number 72315-15 **Emily Mitchell** ☐ None ☐ Restricted 4. Company/Product (Name) Olin Corporation/ High Strength PM# 32 Sodium Hypochlorite 5. Name and Address of Applicant (Include ZIP Code) 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my Olin Corporation product is similar or identical in composition and labeling to: c/o Delta Analytical Corp. EPA Reg. No. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 Product Name ☐ Check if this is a new address Section - II ☐ Final printed labels in response to Agency letter dated ☐ Amendment - Explain below ☐ Resubmission in response to Agency letter dated ☐ "Me Too" Application. ☐ Other - explain below. X Notification - Explain below. 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 Water Soluble Packaging 2. Type of Container Unit Packaging ☐ Yes* ☐ Yes □ Yes ☐ Metal □ No □ No □ No □ Plastic □ Glass □ Paper If "Yes," If "Yes," ☐ Other (Specify) * Certification must Unit Package wgt. Unit Package wgt. No. per container No. per container be submitted. 5. Location of Label Direction 3. Location of Net Contents Information 4. Size(s) of Retail Container ☐ On Label ☐ On Labeling accompanying product □Label □ Container 6. Manner In Which Label Is Affixed to Product Other _ □ Lithograph □ Paper glued ☐ Stenciled () Section - IV 600 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.); 🐪 🐍 Telephone Nos (include Area Code) 301-680-7971 Cristina Griffin Agent for Olin Corporation , (6. Date Application Certification Recaived 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. (Stamped) Agent for Olin Corporation 4. Typed Name

September 29, 2008

Cristina Griffin

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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:

32

Notification of minor label changes

High Strength Sodium Hypochlorite, EPA Reg. No.: 72315-15

Olin Corporation

Dear Ms. Mitchell:

On behalf of Olin Corporation, I am submitting a notification for the product referenced above. This notification is for the same non-pesticidal explanatory language, and California DPR-requested corrections to precautionary statements and to spa/hot tub directions 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 is a minor label change also consistent with the EPA approved Reg. No. 72315-6; all changes on the label are highlighted.

Enclosures

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

If you have any questions regarding this submission, please contact me at 301-680-79 to cgriffin@delta-ac.com.

Sincerely

Cristina Griffin

Agent for Olin

Enclosures

cc: Vickie Ray, Olin Corporation

Cristina Griffin

From: Sent:

Hardy.Michael@epamail.epa.gov Monday, July 28, 2008 9:46 AM

To:

cgriffin@delta-ac.com

Cc:

Hartman.Mark@epamail.epa.gov; Mitchell.Emily@epamail.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

HIGH ST ENGTH SODIUM HYP CHLORITE

KEEP OUT OF REACH OF CHILDREN DANGER

SEE PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT:	EPA Reg. #72315-15	
Sodium Hypochlorite15.5%	EPA Est. #'s 72315-AL-001	61667-CA-001 61667-WA-001
OTHER INGREDIENTS	72315-GA-001	61667-CA-002 61667-WA-002
TOTAL 100.0%	72315-NY-001	61667-LA-001 71207-CAN-002
	72315-TN-001	61667-NV-001

See Bill of Lading for specific establishment number.

		FIRST AID
- ****	•	Move person to fresh air.
If ·	•	If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-
inhaled		mouth, if possible.
	•	Call a poison control center or doctor for further treatment advice.
Tr. 1.		Take off contaminated clothing.
If on skin or clothing	•	Rinse skin immediately with plenty of water for 15-20 minutes.
	•	Call a poison control center or doctor for treatment advice.
If in eyes	•	Hold eye open and rinse slowly and gently with water for 15-20 minutes.
	•	Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
	• '	Call a poison control center or doctor for treatment advice.
	•	Call a poison control center or doctor immediately for treatment advice.
If swallowed	•	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.
Have t	he p	roduct container or label with you when calling a poison control center or doctor, or going for treatment.
	NO	OTE TO PHYSICIAN – Probable mucosal damage may contraindicate the use of gastric lavage.

EXPIRATION DATE: Use within 3 days of manufacture, or within minimum assay of 15.5% sodium hypochlorite. If the product is not within minimum assay, return to manufacturer.

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. Do not get in eyes, on skin or on clothing. Wear safety glasses, goggles or face shield and rubber gloves when handling this product. Wash after handling. Avoid breathing vapors. Vacate poorly ventilated areas as soon as possible. Do not return until strong odors have dissipated.

PHYSICAL OR CHEMICAL HAZARDS: Strong oxidizing agent. Mix only with water according to clubel directions. Mixing this product with chemicals (e.g. ammonia, acids, detergents, etc.) or organic matter (e.g. urine, feces, etc.) will release chlorine gas which is irritating to eyes, lungs and mucous membranes.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans or other 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 discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

READ THE PRECAUTIONARY STATEMENTS BEFORE USE.

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

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.

MANUFACTURING USE ONLY: For manufacturing use only in the formulation of 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 disinfectants of human drinking water (emergency/public/individual), swimming pool water, Hubbard/immersion tank water, spas/hot tubs, hydrotherapy pools, human drinking water systems (e.g. water mains, wells, reservoirs, filters); or disinfectants of nonporous hard surfaces (e.g. tile, glass, stainless steel, fiberglass). Also agents to help control microorganisms in sewage, wastewater, industrial and pulp and paper process water system; or algaecides/slimicides in cooling towers or evaporative condensers; or sanitizers of dialysis machines; or sanitizers of toilet bowls. Also agents to help control algae and bacteria in fish and lobster ponds/tanks and condition 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; or agents to wash fruits and vegetables.

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

STORAGE AND DISPOSAL: Keep this product in a cool, dry, area away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not reuse empty container but place in trash collection. Do not contaminate water, food or feed by storage, disposal or cleaning of equipment.

OLIN CHLOR ALKALI PRODUCTS, 490 STUART ROAD N.E., CLEVELAND, TN 37312

Net Wt: [See Bill of Lading]