



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 21, 2018

Subject: Precautionary Language Updates for Hypochlorite Products

Dear Registrant:

You are receiving this letter because you hold a registration(s) with one or more of the active ingredients listed below. The Agency seeks to ensure that all products are up to date with the most recent labeling guidance regarding these ingredients.

Please see the full list of active ingredients to which this letter pertains are shown in Table 1 :

Table 1- List of Affected Hypochlorite Active Ingredients

| Active Ingredient | PC Code |
|----------------------|---------|
| Calcium Hypochlorite | 014701 |
| Lithium Hypochlorite | 014702 |
| Sodium Hypochlorite | 014703 |

The agency requests that you update the Precautionary Statements (which include Signal Word, Child Hazard Warning, Hazards to Humans and Domestic Animals, First Aid, Personal Protective Equipment, Physical or Chemical, and Environmental Hazards warnings) which are outdated for many of the hypochlorite products. Advancements in scientific knowledge and standards have led to updates in regulations and guidance (e.g., PR Notices 2001-1 and 2007-4). It is important that affected products are accurately labeled in a manner that will prevent unreasonable adverse effects.

Registrants must ensure that their products' labeling language is in accordance with the 40 CFR PART 156—LABELING REQUIREMENTS FOR PESTICIDES AND DEVICES. Guidance based on the 40 CFR for these labeling requirements can be in the agency's Label Review Manual (<https://www.epa.gov/pesticide-registration/label-review-manual>). For a list of references and citations, please see Table 2.

Table 2 – List of Citations

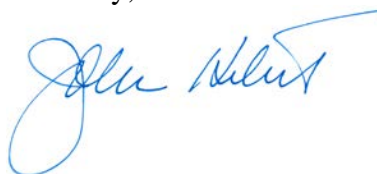
| 40 CFR Citation | Title | EPA's Label Review Manual |
|--|---|----------------------------------|
| §156.62 | Toxicity Category | Chapter 7 |
| §156.64 | Signal Word | Chapters 7 and 10 |
| §156.66 | Child Hazard Warning | Chapter 7 |
| §156.68 | First Aid Statement | Chapter 7 |
| §156.70 | Precautionary Statements for Human Hazards | Chapter 7 |
| §156.78 | Precautionary Statements for Physical or Chemical Hazards | Chapter 9 |
| §156.80 §156.10(i)(2)(ix) §156.140-159 | Environmental Hazards | Chapter 8 |
| §156.212 | Personal Protective Equipment Statements | Chapter 7 |
| §156.10 | Storage and Disposal | Chapter 13 |

To further assist registrants in making the requested changes, we have provided sample language for two categories of changes. Appendices 1 and 2 include sample precautionary language for hypochlorite products.

The agency requests that you submit to Product Manager (PM) 32, for each of your affected products, label amendments addressing the requested changes within 60 days of the date of your receipt of this letter. If your product is also subject to the required label amendments for the registration review of the hypochlorites, then please submit all agency requested label amendments to the Antimicrobials Division Reevaluation Team (PM 36) according to their directions. The Interim Decision document is available publicly for more information.¹ If you have any questions, you may contact either Wanda Henson at (703) 308-6345 or via email at henson.wanda@epa.gov, or Melanie Bolden at (703) 347-0165 or via email at bolden.melanie@epa.gov.

¹ The Interim Decision for the registration review of sodium, calcium, and potassium hypochlorites is posted at www.regulations.gov in dockets EPA-HQ-OPP-2012-0004 and EPA-HQ-OPP-2014-0157 (Published May 1, 2018).

Sincerely,



John Hebert, Chief
Regulatory Management Branch 1
Antimicrobials Division (7510P)
Office of Pesticide Programs

Appendix 1

Sample precautionary language for liquid products containing 5.25%-12.5% Sodium Hypochlorite as an active ingredient:

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Harmful if absorbed through skin. Do not get in eyes, on skin, or on clothing. Wear (specify appropriate protective clothing and gloves). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

Appendix 2

Sample precautionary language for powdered products containing 65%-70% Calcium Hypochlorite as an active ingredient:

DANGER: Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Avoid breathing dust. Wear (specify appropriate protective clothing and gloves). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.