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Submitting Organization		
CLOROX SVCS CO		
Contractor		
Document Title		
INITIAL SUBMISSION: LETTER FROM CLOROX SVCS CO TO USEPA REPORTING DEATH ASSOCIATED WITH MIXTURE OF PROFESSIONAL STRENGTH LIQUID PLUMR DRAIN OPENER WITH AMMONIA, DATED 10/12/2000		
Chemical Category		
SODIUM HYPOCHLORITE, SODIUM HYDROXIDE, SODIUM CHLORIDE, AMM*		

ACI 03 Services Company

BEHQ 1000-14802

4036H



October 12, 2000

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2000 OCT 18 AM 7:10

Document Processing Center (TS-790)
Attn: Section 8(e) Coordinator
U.S. EPA Office of Toxic Substances
401 M Street NW
Washington, DC 20460

Subject: TSCA Section 8(e) Report
Professional Strength Liquid Plumr Drain Opener

The following information is being sent to the EPA pursuant to section 8(e) of TSCA, which requires the reporting of unexpected adverse effects.

Submitter:
The Clorox Services Company
7200 Johnson Dr
Pleasanton, CA 94588

By: Reza S. Rahaman, PhD
Manager of Product Safety, Environment & Regulatory Compliance
925-469-8336

Contain NO

Transmittal Date: October 12, 2000

Product Name:

1. Professional Strength Liquid Plumr Drain Opener (Manufactured by The Clorox Company)

(Contains Water, CAS No. 7732-18-5; Sodium hypochlorite, CAS No. 7681-52-9, Sodium hydroxide, CAS No. 1310-73-2; Sodium chloride, CAS No. 7647-14-5).

2. Parson's Ammonia (Current manufacturer - Church & Dwight)

3. Liquid Plunge (Formerly produced by Drackett. In 1969, the product contained 25% lye per conversation with former Drackett Company employee).

Summary:

This letter reports a death possibly resulting from exposure to chloramine gas that was formed subsequent to mixing sodium hypochlorite with ammonia. This is the first allegation of a death related to chloramines exposure that has come to the attention of Clorox.

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2000 OCT 27 AM 9:42
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On September 25, 2000, Clorox received a call from Chemtrec through the 1-800-UR-Clorox line concerning an accidental death resulting from the misuse of our Professional Strength Liquid Plumr product. The information in this report is compiled from conversations with the following sources:

Mr. Raymond Henry- Bethlehem, PA. Fire Department
Mr. David Krause, Deputy Coroner, Lehigh County, PA., 610.782.3426.
Mr. Thomas Flores, Chemtrec.

Details

Ms. Emma Erkiger, a 74 or 77 year old female, was found dead in her bathtub on Monday, September, 25. The actual time of death is estimated as sometime on Saturday, September, 23. She was not bathing. On Saturday, Ms. Erkiger mentioned to a neighbor that she had drain problems.

Quart bottles of Professional Strength Liquid Plumr and Parsons Lemon Scented Ammonia were in the bathtub. Two gallons of another drain opener, Liquid Plunge, were also found in the bathroom. According to Mr. Krause, the Plumr and Parsons bottles were found floating in the tub. The pH of the tub water was 13. Mr. Krause reported a strong bleach smell in the room while Mr. Henry did not.

The preliminary causes of death from the autopsy is "complications of chemical inhalation and contact" and "drowning". The coroner's hypothesis is that Ms. Erkiger accidentally mixed the cleaning products, was overcome by fumes, collapsed into the bathtub and drowned. In his opinion, it appeared that she had struggled to get out of the tub since the shower curtain was displaced from normal.

The autopsy found bathtub fluid in the lungs and sinus cavities. A sample of this fluid was retained. Pulmonary edema was also observed. Chemical burns to the skin were observed around the ankles and genitalia. Some of these were premortem based on their appearance. Mr. Krause indicated that his office will make a routine report of this incident to the Consumer Product Safety Commission.

According to Mr. Krause, there is limited information on the Plunge product. The label, which has a 1969 date, indicates that it contains lye and that it was produced in Cincinnati, Ohio. Chemtrec was unable to find information on this product in the Micromedex database. (Subsequent to this phone call, Clorox determined that Drackett was the producer of Plunge. Clorox contacted Brian Ruble, now working for Dial but a former Drackett employee, In 1969, the product contained 25% lye and was reformulated in 1970 or 1971 to 9.25% lye).

Reference:

Lehigh County Coroner
501 West Hamilton St.
Allentown, PA 18101-1501
Case # J2000-04888; Ms. Emma Erkiger

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Please see attached. [Name] was found dead in her bathtub on September 25, 2000. The preliminary autopsy indicates the cause of death as "complications of chemical inhalation and contact" and "drowning."

The 3 products listed above were found in the bathroom and were presumably mixed.

Chloramine Exposure Statistics

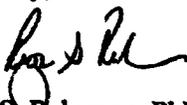
It is well documented in both literature and product labeling that mixing of sodium hypochlorite and ammonia may result in chloramine gas formation. Although there is a range of responses to chloramine gas, the majority of those exposed experience rapid resolution of symptoms [Mrvos R, Dean BS, Krenzelok EP. 1993. Home exposures to chlorine/chloramine gas: review of 216 cases. South Med. J. 86(6):654-657].

In 1999 none of the chloramine exposures reported to poison control centers resulted in death [Litovitz, T. et al. 1999 Annual Report of the American Association of Poison Control Centers Toxic Exposure Surveillance System. American Journal of Emergency Medicine, 18(5): 517-574].

In summary, Clorox contends that the case of [Name] is unusual.

If you have any questions regarding this report, please contact me at 925-469-8336.

Sincerely,



Reza S. Bahaman, PhD

Manager of Product Safety, Environment & Regulatory Compliance

Enc (1)

cc: Mr. Robert Coleman (Church & Dwight), Mr. Patrick Meehan (Clorox)

CERTIFICATE OF AUTHENTICITY

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