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CODING FORMS FOR SRC INDEXING

Microfiche No.		OTS0574082	
New Doc ID	89010000036	Old Doc ID	8EHQ-100C-14802
Date Produced	10/18/00	Date Received	10/30/00
		TSCA Section	8E
Submitting Organization		CHURCH & DWIGHT CO INC	
Contractor			
Document Title		SUPPORT: LETTER FR CHURCH & DWIGHT CO INC TO USEPA ACKNOWLEDGING DEATH ASSOCD W/MIXT PARSONS'S LEMON SCENTED AMMONIA ALL PURPOSE CLEANER W/LIQ PLUMR DRAIN OPENER, DATED 10/18/00	
Chemical Category		AMMONIA; SODIUM HYPOCHLORITE, SODIUM HYDROXIDE, SODIUM CHLO*	

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8EHQ-1000-14802

40690

CHURCH & DWIGHT CO., INC.

CONSUMER PRODUCTS • SPECIALTY PRODUCTS



**ACKNOWLEDGEMENT OF SUBMITTED REPORT:
DO NOT COUNT AS A SECOND TSCA 8(E) REPORT**

October 18, 2000

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

RECEIVED
OPPT/CBIC
2000 OCT 30 AM 7:01

RE: Acknowledgement of TSCA 8(e) Report (attached)
Original Submitter: The Clorox Services Company, Pleasanton, CA
Date: October 12, 2000

Nature of Incident: Death possibly resulting from exposure to chloramine gas.

Products Involved: Professional Strength Liquid Plumr Drain Opener (Manufactured by The Clorox Company)

Parson's Lemon Scented Ammonia All Purpose Cleaner
(Distributed since 1998 by Church & Dwight Co., Inc.)

Liquid Plunge (Samples found at the scene represented product produced in 1969 by the Drackett Company, Cincinnati, OH)

RECEIVED
OPPT/CBIC
2000 NOV -9 PM 12:36

Summary:

On October 10, 2000 Church & Dwight (C&D) received a call from The Clorox Company (Clorox) informing us of an unexpected adverse effect (death), possibly related to the mixing of their sodium hypochlorite product (Liquid Plumr Drain Opener) and our ammonia product (Parson's Ammonia), with the possible involvement of a third product that contained lye (Liquid Plunge). Clorox advised C&D that it was going to file a TSCA 8(e) report on the incident. On October 13, 2000 C&D received a copy of the TSCA 8(e) report from Clorox.

C&D is submitting to EPA this acknowledgement of the reported incident. C&D to date has not been contacted by any other sources regarding the incident. It is possible, since C&D only purchased the product from The Dial Corporation in August 1997, that the label on the Parson's Ammonia product may not have indicated C&D as the distributor.



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C&D, like Clorox, is aware of the potential for chloramine gas formation when incompatible products are mixed. Furthermore, C&D, as with other product marketers, warns of the dangers of mixing household products on applicable product labels. We also are not aware of any previous exposures to chloramine gas resulting in death, and concur that the reported incident is atypical since the anticipated and familiar effects of exposure to chloramine gas as a result of product misuse usually resolve quickly.

If you have any questions or if you require further information on our Parscol's Ammonia product, please contact me.

Sincerely,



Bob Coleman
Senior Manager
Professional & Regulatory Services

Phone: (609) 497-7130

Fax: (609) 497-7428

Email: colemro@churchdwight.com

cc: Dr. Reza S Rahaman (Clorox), Mr. David W. Worrell (Church & Dwight)

A.05



October 12, 2000

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 Plumb 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

Transmittal Date: October 12, 2000

Product Name:

1. Professional Strength Liquid Plumb 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.

P.O. Box 493
Pleasanton, California
94566-0803
(510) 847-6100
FAX (510) 463-1187

Post-it® Fax Note	7671	Date	10/13/00	# of pages	3
To	Robert Coleman	From	Janet Martinez		
Co./Dept	Church & Dwight	Co.	Clorox		
Phone #		Phone #	925-847-6704		
Fax #	609-497-7428	Fax #	925-847-2496		

Please see attached. [redacted] 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

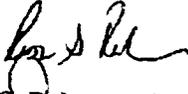
It is well documented in both literature and product labeling that mixing of sodium hypochlorite and ammonia may result in chloramine gas formation. Although there is a range of responses to chloramine gas, the majority of those exposed experience rapid resolution of symptoms [Mrvos R, Dean BS, Krenzelok 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 [redacted] is unusual.

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

Sincerely,



Reza S. Rahaman, PhD
Manager of Product Safety, Environment & Regulatory Compliance

Enc (1)

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

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 Plumb 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

..... 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 Plumb 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 Plumb 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 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 the 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

CERTIFICATE OF AUTHENTICITY

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