

To: Jennifer McLain
Lance Wormell
Rose Kyprianou
Joel Wolf

From: Erik Olson, Mae Wu of Natural Resources Defense Council
Tom Neltner of Environmental Defense Fund
Maricel Maffini, Independent Consultant

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More than two years ago, the Natural Resources Defense Council (NRDC) submitted the attached letter to Environmental Protection Agency (EPA) regarding the registration review for sodium and calcium hypochlorite (Docket No. EPA-HQ-OPP-2012-0004). On March 3, 2015, in response to Tom Neltner's follow-up request to Lance Wormell, Joel Wolf responded that EPA was "currently working on a response to the letter and I anticipate that we should have a response for you in April." In the intervening 17 months, we have not seen any activity. Our letter has not even made it into the docket. We write to request that EPA take action immediately to respond to our letter by completing the registration review for sodium and calcium hypochlorite, giving full consideration to the perchlorate creation and exposure issue.

Perchlorate exposure is a serious health concern, especially for pregnant women and infants who do not get sufficient iodine. While there are many sources of perchlorate in the diet, hypochlorite is certainly a significant contributor to the ongoing burden, especially in food where it is commonly used to disinfect processing and packaging equipment. Reducing the concentration at which hypochlorite is stored is likely to be an effective technique in reducing dietary perchlorate exposure, especially if coupled with reduced storage times and storage at lower temperatures.

We hereby reiterate our request that EPA immediately complete its registration review for hypochlorite. We request that in so doing, the agency must take all appropriate measures to ensure that there is a reasonable certainty of no harm to the health of infants, children, and pregnant women from cumulative exposure to hypochlorite and perchlorate from the degradation of hypochlorite's use as a pesticide, in accordance with the mandates of the Food Quality Protection Act (FQPA).