

**M e m o r a n d u m**

1-o : Registration Specialists  
Pesticide Registration Branch

Date : March 6, 1992

Place : Sacramento

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From : Department of Pesticide Regulation - Tobi Jones, Chief *Tobi Jones*  
Pesticide Registration Branch

Subject: Sodium Bicarbonate and Sodium Carbonate Toxicology Data Waiver

The Medical Toxicology Branch has determined that toxicity data requirements can be waived for California-only products consisting of 100% sodium bicarbonate or 100% sodium carbonate.

This determination applies to swimming pool products used to increase alkalinity and which bear the following labeling:

Sodium bicarbonate - Must have the signal word "Caution" and the statement "Keep out of reach of children".

Sodium carbonate - In accordance with the Hazardous Substance Labeling Guide of the Consumer Product Safety Commission (CPSC) must have the statement "Caution - Irritant - Harmful if swallowed". Public literature indicates that sodium carbonate is a moderate skin irritant and a Toxicity Category III oral toxicant.

Therefore, if all of the above criteria are met, there is no need to route these products to the Medical Toxicology Branch. A copy of this memorandum should be included in each package.

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