Bradley N. Johnson, Ph.D.
Regulatory Affairs
The Proctor & Gamble Company
11530 Reed Hartman Highway
Cincinnati, OH 45241-2422

Dear Dr. Johnson:

Re: Registration of Tide with Bleach (EPA Reg. No. 3573-56) Containing Two
New Active Ingredients, Sodium Perborate and Sodium
Nonanoyloxybenzene-sulfonate

We have approved the application received November 20, 1998 to register the referenced product in New York State. The product contains two new active ingredients, sodium perborate and sodium nonanoyloxybenzenesulfonate (NOBS), and is labeled for sanitizing laundry.

Tide with Bleach with this exact formulation has been sold and used since 1984. However, only bleaching claims were made; not pesticidal claims. We have concluded that registration allowing pesticidal claims to be added to the label would present no significant increase in use of the product because the product is already in widespread use. Therefore, we believe there would not be an unacceptable risk to product users while additional studies are conducted and reviewed.

The registration is conditional upon the submission to the Department of all studies required as conditions of the United States Environmental Protection Agency (USEPA) registration. Submission must be concurrent with the submission to the USEPA on, or before, January 5, 2000. Required studies include:

On NOBS Test material:

1. Hydrolysis study;
2. Avian oral LD50 study (Bobwhite quail);
3. Mutagenicity (other genotoxic effects);
4. Acute neurotoxicity study;
5. 90-Day neurotoxicity study;
6. Immunotoxicity study;
7. Human exposure data; and
8. Acute toxicity studies for bluegill sunfish and Daphnia magna.

On sodium perborate:

1. EPA series 61, 62, and 63 product chemistry data.
On the formulated product:

1. One-year storage and stability study.

Enclosed are copies of the stamped accepted label for Tide with Bleach (EPA Reg. No. 3573-56) and the New York State Certificate of Pesticide Registration.

If you have any questions regarding this product, please contact Maureen Serafini, Chief of our Pesticide Product Registration Section, at (518) 457-7446.

Sincerely,

[Signature]

Stephen Hammond, P.E.
Director
Division of Solid & Hazardous Materials

Enclosures

cc: w/enc. - N. Kim/J. Leach
    G. Good/W. Smith