ADVISORY OPINION

MAR 01 1974

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Mr. Sam Fox
[redacted], Inc.
[redacted]
[redacted] Illinois [redacted]

Dear Mr. Fox:

On November 28, 1973, you submitted a copy of a Consumer Product Safety Commission sample analysis report on sample 026-662G showing that the sample of [redacted] tested contains approximately 1.5 percent sodium hydroxide. You stated in your accompanying letter that assuming the product was properly labeled, it appeared that the product could be marketed without the use of special packaging.

Since different production units of the product may differ insofar as the quantity of sodium hydroxide present, we are unable to state categorically that the product, [redacted] is not required to be in special packaging. However, any unit of the product represented by the report of analysis, showing less than 2 percent by weight sodium hydroxide, is not subject to the child protection packaging standards for sodium and/or potassium hydroxide.

Sincerely,

D. Stephen Lemberg
Attorney
Office of the General Counsel

DSLemberg:clb:3/1/74

cc: Executive Director
Secretary
Edward Finch, BCM
S. Lemberg
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