



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FILE COPY

September 15, 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Clint M. Kayser
Vice President
Miami Products & Chemicals Co.
520 Lonoke Street
Dayton, OH 45403

Subject: Sanygen Industrial Clor
EPA Reg.#: 278-64
Notification Date: August 20, 2010
Receipt Date: September 1, 2010

Dear Mr. Kayser:

This acknowledges the receipt of your notification, submitted under the provision of PR Notice 98-10 and FIFRA section 3(c)9.

Proposed Notification:

Add refillable container instructions in the Storage and Disposal Label Statement in compliance with PR Notice 2007-4 for Sanygen Industrial Clor (EPA Reg.#: 278-64).

General Comment:

Based on the review of the material submitted, the notification application is acceptable, and the following comments apply:

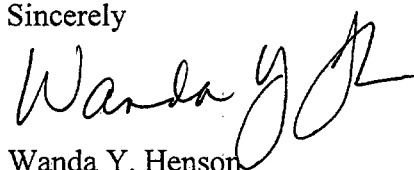
1. [Under Subheading] **Container Handling** insert "**Sanygen Industrial Clor** before Sodium Hypochlorite
2. Insert [Subheading] "**Container Disposal**"
When the container has been cleaned and completely empty then offer for recycling, if available or dispose of in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay of smoke

This notification and a copy of this letter have been inserted in your file for future reference.”

If you have any questions on this letter, please contact David Liem at 703-305-1284 or by email at liem.david@epa.gov

Sincerely



Wanda Y. Henson
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobial Division (7510P)

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Please read instructions on reverse before completing form.

Form Appr

OMB No. 2070-0060

Print Form



United States
Environmental Protection Agency
Washington, DC 20460

 Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 278-64	2. EPA Product Manager Tom Luminello	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Sanygen Industrial Clor	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Miami Products & Chemical Co., 520 Lonoke Street, Dayton, OH 45403 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 278-64 Product Name Sanygen Industrial Clor	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Addition of Storage and Disposal language to cover Refillable Containers and Container Cleaning, the original label was approved for Bulk Packaging only. Second, removal of the DOT "Corrosive" symbol.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted	If "Yes" Unit Packaging wgt. Varies	No. per container 1	If "Yes" Package wgt	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container Varies	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product			
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Clint M. Kayser	Title Vice President	Telephone No. (include Area Code) (937) 253-8927
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamp)
2. Signature	3. Title Vice President	
4. Typed Name Clint M. Kayser	5. Date August 20, 2010	



MIAMI PRODUCTS & CHEMICAL CO.

P.O. BOX 486 • DAYTON, OHIO 45401 • (937) 253-8927 • (800) 776-1313 • FAX (937) 253-1559

U.S. Environmental Protection Agency
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
1200 Pennsylvania Avenue, N.W.
Washington, DC
20460-0001

August 20, 2010

Re: Notification - 278-64, Sanygen Industrial Clor

Dear Sir/Madam:

Miami Products & Chemical Co. (MPC) is submitting this Notification in regard to our current label 278-64 which was approved by U.S. EPA on February 19, 2010. Our initial use of the label encompassed bulk packaging, however for future business purposes we recognize that we must include such statements as mandated in PRN 2007-4 regarding refilling and cleaning.

We are providing the Agency with a single "marked-up" copy of our label which identifies the additional language added to the label in compliance with PRN 2007-4.

Miami Products & Chemical Co. has made every effort to ensure that this Notification aligns with mandated requirements and as such states that:

"This notification is consistent with the provisions of PRN 2007-4 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make a false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 2007-4 and 40 CFR 152.46, this product may be in violation of FIFRA and may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Please note that we did not include Child-Resistant Certification due to the fact that the refillable containers will be used in a commercial and/or industrial setting where children would not be exposed to this product. These refillable containers will be various sized plastic drums and/or tote tanks. These closures, in accordance with the manufacturers guidelines, typically require special tools to be removed

Respectfully Submitted,

A handwritten signature in cursive script that reads "Clint Kayser".

Miami Products & Chemical Co.

Clint Kayser
Vice- President

