

748-31

2/4/2014

FILE COPY

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

FEB - 4 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

David Sarvadi
Keller And Heckman LLP
1001 G Street, NW
Suite 500 West
Washington, DC 20001

Subject: Axiall Corporation
CHLORINE
EPA Registration No. 748-31
Application Dated: January 7, 2014
Receipt Dated: January 8, 2014

Dear Mr. Sarvadi:

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

Proposed Notification:

- Remove the words, "May be" from the statement of principal hazard wherever it appears on the label.
- Delete obsolete reference to Mine Safety and Health Administration.
- Correct the Chlorine Institutes city reference
- Replace "experienced personnel" with the statement that the product can only be used by personnel trained in accordance with the Chlorine Manual.

General Comments:

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable and has been made a part of the file for this product.

Should you have any questions or comments concerning this letter, please contact me at Henson.Wanda@epa.gov or call (703) 308-6345.

Sincerely,

A handwritten signature in black ink, appearing to read "Wanda Y. Henson".

Wanda Y. Henson
Environmental Protection Specialist
Regulatory Management Branch II
Antimicrobials Division (7510P)



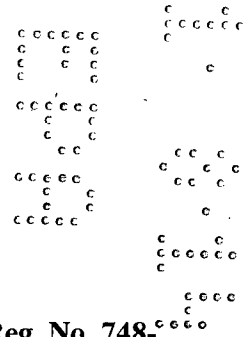
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
tel. 202.434.4100
fax 202.434.4646

Writer's Direct Access
David G. Sarvadi
(202) 434-4249
sarvadi@khlaw.com

January 7, 2014

Via Courier

Mr. Demson Fuller
U.S. Environmental Protection Agency (EPA)
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 7510P
Washington, DC 20460



Re: Axiall Corporation, Notification of Label Changes to EPA Reg. No. 748-31

Dear Mr. Fuller:

On behalf of our client, Axiall Corporation, we are submitting a notification of label changes to the chlorine pesticide product assigned EPA Registration Number 748-31. These changes were prompted by questions from California regarding certain provisions in the 1999 Registration Eligibility Decision for Chlorine Gas. We provided you an advance draft of these changes via electronic mail on January 6, 2013, which you discussed with the California Department of Pesticide Regulation (DPR) reviewer. In a telephone call on January 6, you indicated that both EPA and DPR found the changes acceptable. Accordingly, we request that EPA process this notification immediately so that the dependent state registration actions can proceed without further delay.

The changes proposed are as follows:

- Remove the words, "May be" from the statement of principal hazard in two places, on both the front and back of the tag;
- Delete the reference to the Mine Safety and Health Administration as obsolete, because the regulations regarding respirators were changed more than 10 years ago and MSHA no longer approves respirators;
- Correct the city reference for the Chlorine Institute to Arlington, Virginia; and
- Replace the words, "experienced personnel only" with the words, "only by personnel trained in accordance with the Chlorine Manual" in two places; in the directions for use for disinfection and algaecides and for manufacturing processes.

KELLER AND HECKMAN LLP

Mr. Demson Fuller

January 7, 2014

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As requested in the guidance on notifications for label changes, we are submitting two copies of the label, one clean copy and one with the changes clearly marked in redline-strikeout format.

We are copying the California DPR reviewer on this notice.

This notification is consistent with the provisions of Pesticide Registration (PR) Notice 98-10 and EPA regulations at 40 C.F.R. 152.46, and no other changes have been made to the labeling. I understand that it is a violation of 18 U.S.C. § 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 C.F.R. 152.46, this product may be in violation of the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Respectfully submitted,



David G. Sarvadi

Enclosures

cc: Natalie Gaydos, Axiall Corporation
Tulio Macedo, California DPR

CHLORINE

UN1017 RQ
LIQUEFIED GAS UNDER PRESSURE, NON-FLAMMABLE

EXPOSURE	Remove patient from contaminated area. If breathing, place in a comfortable position, keep warm and at rest until physician arrives. If breathing is difficult, give oxygen. If breathing has stopped, give artificial respiration, preferably mouth-to-mouth. Call a physician as soon as possible. Keep patient at rest.
SPILL OR LEAK	Immediately evacuate area. Only trained personnel wearing NIOSH - approved, full-face, self-contained breathing apparatus and full protective clothing may enter area to locate leak. DO NOT PUT WATER ON LEAK. Use appropriate emergency capping kit.
FIRE	Cannot catch fire. Notify fire-fighting personnel chlorine containers are in area. Otherwise, keep containers cool with water spray. Chlorine will support combustion. Reacts readily with hydrocarbons, alcohols, ethers, ammonia, hydrogen, and some metals, sometimes with explosive violence. Will react with (burn) steel containers at temperatures above 450°F.
EMERGENCY	Transportation Incident: Contact CHEMTREC at 1-800-424-9300. In all other emergencies, contact Axiall, LLC at 304-455-6882.

DANGER! **POISON**

- **FATAL IF INHALED**
- **CORROSIVE - CAUSES SEVERE BURNS**

DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with the labeling. Have available full-face, self-contained breathing apparatus approved by the U.S. National Institute for Occupational Safety and Health. Handle and use only in accordance with practice recommended in the Chlorine Manual published by Chlorine Institute, Inc. Arlington, Virginia. Use only in well-ventilated areas. Only specifically designed dispensing equipment should be used and only in accordance with manufacturer's instructions and according to state regulatory agency recommendations for dosages or residual chlorine levels which should be maintained for each specific site of application.

For specific information refer to the Chlorine Institute Pamphlet 66, "Chlorine Tank Car Loading, Unloading, Air Padding, Hydrostatic Testing."

Cars must be monitored during the unloading operation. When not in use or when car is left unattended, valves must be closed and unloading lines disconnected.

ALWAYS BE PREPARED FOR AN EMERGENCY! See Chlorine Institute Pamphlet 64, Emergency Control Planning Checklist.

STORAGE AND DISPOSAL

Chlorine tank cars and tank trailers are designed for reuse and must be returned to the supplier. The tank cars or tank trailers to be returned should be identified with DOT tag or label and shipping in accordance with supplier's instructions. Bulk storage containers must not be left unlabeled and accessible to the general public. All storage containers must have a weather resistant label attached near outlet valve.



Axiall, LLC 115
Perimeter Center
Place Suite 460
Atlanta, GA 30346

EPA REG. No. 748-31
EPA EST. No. 748-LA-1

Net Weight _____ Tons

CL2-TG-US LKC-0513A-DV

SEE REVERSE SIDE FOR PRECAUTIONS AND FIRST AID

NOTE: READ TAG BEFORE UNLOADING

CHLORINE

UN1017 RQ
LIQUEFIED GAS UNDER PRESSURE, NON-FLAMMABLE

FOR USE AS A DISINFECTANT AND/OR ALGICIDE, by only by personnel trained in accordance with the Chlorine Manual, in the treatment of municipal water supplies, sewage and waste management plants, in accordance with all applicable federal, state, and local laws and regulations.

FOR USE IN MANUFACTURING PROCESSES, by only by personnel trained in accordance with the Chlorine Manual, in the production of bleach, plastics, chlorinated solvents, refrigerants, and intermediates for products containing no chlorine. Proper training in safety and use of protective equipment are essential. Well designed and maintained handling and processing facilities are required.

FOR USE BY REPACKAGERS FOR THE ABOVE USES, in accordance with all applicable federal, state, and local laws and regulations.

Active Ingredient: Chlorine 99.5%
Other Ingredients: 0.5%

KEEP OUT OF REACH OF CHILDREN

DANGER!  **POISON** 

- FATAL IF INHALED
- CORROSIVE - CAUSES SEVERE BURNS

+ FIRST AID +

If inhaled: After properly protecting yourself, move person to fresh air. Contact a poison control center, emergency room or physician as soon as possible as further treatment will be necessary. If person is not breathing, call 911 or an ambulance, then give artificial respiration immediately. Trained personnel should administer humidified oxygen.

If on Skin or Clothing (contact with liquid chlorine): Use an emergency shower immediately for at least 15 minutes. Remove contaminated clothing under the shower. Call a Poison Control Center or doctor for treatment advice.

If on Skin (contact with gaseous chlorine): Immediately change contaminated clothing and wash exposed area with soap and water. Refer to a physician if irritation persists or if the skin is blistered or broken.

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. If contact lenses are present, remove the lenses after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.

Contact 304-455-6882 or your Poison Control Center for 24-hour emergency medical treatment information. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN: Symptoms may become more severe up to 36 hours after exposure including pulmonary edema.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

- ☐ **DANGER.** Fatal if inhaled or absorbed through the skin. Corrosive. Causes irreversible eye damage and skin burns. Do not breathe vapors or get in eyes, on skin or clothing. Wear goggles, protective clothing and rubber gloves as discussed below. Wash hands thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash clothing before reuse. Prolonged frequently repeated skin contact may cause allergic reactions in some individuals.
- ☐ **PERSONAL PROTECTIVE EQUIPMENT.** Applicators and other handlers must wear long-sleeved shirts, long pants, shoes, and socks



Axial, LLC 115
Perimeter Center
Place Suite 460
Atlanta, GA 30346

CL2-TG-US LKC-0513A-DV

SEE REVERSE SIDE FOR HANDLING AND STORAGE

NOTE: READ TAG BEFORE UNLOADING