

April 13, 2005

Roger E. Etherington
Vulcan Chemicals
P.O. Box 385015
Birmingham, AL 35238-5015

Subject: Technical Sodium Chlorite
EPA Registration No. 5382-42
Submission Date: January 5, 2005
Receipt Date: January 13, 2005

Dear Mr. Etherington:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the condition listed below:

- Revised label to change oral toxicity precautionary statement from Category III to Category II.

Condition

References are made under the Mollusk Control directions for use to dilute down to 3% active aqueous solution for use in chlorine generators. Data has not submitted to support the effectiveness of this product at that rate. Therefore, the 3% has been eliminated from the proposed label, until such time as data is provided and accepted by the Agency.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

CONCURRENCES

SYMBOL	M57UC						
SURNAME	Mitchell						
DATE	4-13-05						

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Should you have any questions or comments concerning this letter, please contact Wanda Mitchell at (703) 308-6345.

Sincerely,

Emily H. Mitchell
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

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TECHNICAL SODIUM CHLORITE

ACTIVE INGREDIENT: Sodium Chlorite80%
OTHER INGREDIENTS:.....20%
AVAILABLE CHLORINE.....125%

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

- If in eyes:**
 - Hold eye open and rinse slowly and gently with water for 15-20 minutes.
 - Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
 - Call a poison control center or doctor immediately for treatment advice.
- If on skin or clothing:**
 - Brush off excess chemical.
 - Take off contaminated clothing.
 - Rinse skin immediately with plenty of water for 15-20 minutes.
 - Call a poison control center or doctor for treatment advice if burning or irritation of the skin persists.
- If swallowed:**
 - Have person drink a glass of water immediately if able to swallow.
 - Call a poison control center or doctor immediately for treatment advice.
 - Do not induce vomiting unless told to do so by the poison control center or doctor.
- If inhaled:**
 - Do not give anything by mouth to an unconscious person.
 - Move person to fresh air and monitor for respiratory distress.
 - If cough or difficulty in breathing develops, consult a physician immediately.
 - If person is not breathing, call 911 or an ambulance, then give artificial respiration.
 - Call a poison control center or doctor for further treatment advice.

For emergency information call: 800-835-2030 (24 Hours)

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No. 5382-42

EPA Est. 5382-KS-1

100 Lbs.Net

ACCEPTED
with COMMENTS

EPA Letter Dated:

VMC-6100 (1/05)

APR 13 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 5382-42

PRECAUTIONARY STATEMENTS

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HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed. Irritating to nose and throat. Do not get in eyes, on skin or clothing. Wear protective eyewear (goggles or safety glasses). Wear protective clothing and rubber gloves when handling this product. Avoid breathing dust and fumes. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse to avoid fire.

ENVIRONMENTAL HAZARDS

This product 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 the 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.

CHEMICAL HAZARDS

Danger: strong oxidizing agent. Mix only into water. Contamination may start a chemical reaction with generation of heat, liberation of hazardous gases (chlorine dioxide a poisonous, explosive gas), and possible fire and explosion. Do not contaminate with moisture, garbage, dirt, organic matter, household products, chemicals, soap products, paint products, solvents, acids, vinegar, beverages, oils, pine oil, dirty rags, or any other foreign matter. Do not use moist or damp utensils.

DIRECTIONS FOR USE

It is a violation of Federal law to use the product in a manner inconsistent with its labeling.

Directions for Controlling the Growth of Algae in Recirculating Cooling Water Towers

1. Clean badly fouled systems before starting treatment. 2. When algae are visible, add an initial dosage of 5.3 fl. oz. (3.4 oz. by wt.) of Sodium Chlorite per 1,000 gals. of water in the system. Repeat if necessary until control is evident. 3. Where algae control is evident, use a subsequent dose of 2.6 fl. oz. (1.7 oz. by wt.) of Sodium Chlorite solution per 1,000 gals. of water in the system twice a week or as needed to maintain control. 4. Add Sodium Chlorite directly to the cooling tower drip pan (cold water basin) near the inlet to the recirculating pump.

Directions for Use in the Mechanical or Electrolytic Generation of Chlorine Dioxide as a Disinfectant, or for Microorganism or Mollusk Control and as a Chemical Oxidant in Aquatic Systems.

Feed requirements: Feed rates of Technical Sodium Chlorite will depend on the severity of contamination and the degree of control desired. The exact dosage will depend on the size of the system and residual necessary for effective control. Depending on the generator type, Technical Sodium Chlorite Solution is typically diluted at the point of use to prepare a ~~30%~~ 25% active aqueous solution for use in chlorine dioxide generators.

Some examples of industrial applications of chlorine dioxide include:

- Potable water disinfection and removal of sulfide.
- Control of bacterial slime and algae and mollusks in industrial recirculating and one-pass cooling systems.
- Biocontrol in food processing flumes, water-using equipment, cooling water, and recycled waters.
- Disinfection of sewage and plant wastes.

- 5 7 6
- Destruction of phenolics, simple cyanides and sulfides by chemical oxidation.
 - Bacterial slime control in white water paper mill systems.
 - Bacterial control in oil well and petroleum systems.

See product bulletins (or Technical Data Sheets) for specific application instructions. Your Vulcan representative can guide you in the application techniques.

Method of feed: Large amounts of chlorine dioxide can be generated by two common methods, including:

1. The chlorine method which utilizes a Sodium Chlorite solution and chlorine gas, or
2. The hypochlorite method which utilizes a Sodium Chlorite solution, a hypochlorite solution, and an acid.

Your Vulcan representative can guide you in the selection, installation and operation for feed systems. Consult product bulletin and also the instructions on the chlorine dioxide generation system before using Technical Sodium Chlorite .

User is responsible for compliance with applicable Federal, state and local laws regarding proper use and disposal of the chlorine dioxide generated.

Potable Water Treatment

Chlorine dioxide (ClO₂) is used as both an oxidant and a disinfectant in drinking water treatment. The required dosages will vary with source water conditions and the degree of contamination present. For most municipal and public potable water systems, a chlorine dioxide residual concentration of up to 2 ppm is sufficient to provide adequate disinfection. Residual disinfectant and disinfection byproducts must be monitored as required by the National Primary Drinking Water Regulations (40 CFR Part 141) and state drinking water standards.

Industrial Cooling Water Treatment

For control of bacterial slime and algae in industrial recirculating and one-pass cooling systems, the required dosages will vary depending on the exact application and the degree of contamination present. The required chlorine dioxide residual concentrations range between 0.1 and 5.0 ppm. Chlorine dioxide may be applied either continuously or intermittently. The typical chlorine dioxide residual concentration range is 0.1 - 1.0 ppm for continuous doses, and 0.1 - 5.0 ppm for intermittent doses. The minimum acceptable residual concentration of chlorine dioxide is 0.1 ppm for a minimum one minute contact time.

Mollusk Control in Water Systems

Chlorine dioxide generated from sodium chlorite may be used for mollusk control in commercial and industrial recirculating and one-pass cooling water systems. The required dosages will vary with the system type, system conditions, the degree of water contamination present and the desired level of control. Depending on the extent of the infestation, sodium chlorite may be applied either continuously or intermittently through a chlorine dioxide generating system to achieve the necessary chlorine dioxide residual concentration.

Veliger Control: Maintain a continuous chlorine dioxide residual of 0.1 - 0.5 ppm.

Intermittent Dose: Apply chlorine dioxide to obtain a chlorine dioxide residual concentration of 0.2 - 25 ppm. Repeat as necessary to maintain control.

Continuous Dose: Maintain a chlorine dioxide residual concentration of up to 2 ppm

Food Plant Process Water Treatment

Chlorine dioxide generated from sodium chlorite is effective for use in controlling microbiological growth in flume water and other food processing water systems such as chill water systems and hydrocoolers. The required dosages will vary with process conditions and the degree of contamination present. Depending on the requirements of the specific water system, sodium chlorite should be applied continuously or intermittently through a chlorine dioxide generating system to achieve a chlorine dioxide residual concentration between 0.25 and 5.0 ppm.

Water, containing up to 3 ppm residual chlorine dioxide may be used for washing fruits and vegetables that are not raw agricultural commodities in accordance with 21CFR§173.300. Treatment of the fruits and vegetables with chlorine dioxide must be followed by a potable water rinse, or by blanching, cooking or canning.

Wastewater Treatment

Chlorine dioxide (ClO₂) is effective as both a disinfectant and an oxidant in wastewater treatment. The required dosages will vary with water conditions and the degree of contamination present. For most municipal and other wastewater systems, a chlorine dioxide residual concentration of up to 5 ppm is sufficient to provide adequate disinfection.

For sulfide odor control, between pH 5-9, a minimum of 5.2 ppm (wt) of chlorine dioxide should be applied to oxidize 1 ppm of sulfide (measured as sulfide ion). For phenol destruction, at pH less than 8, 1.5 ppm chlorine dioxide will oxidize 1 ppm phenol; at pH greater than 10, 3.3 ppm chlorine dioxide will oxidize 1 ppm phenol.

Bacterial Slime Control in Paper Mills

Chlorine dioxide generated from sodium chlorite is effective for use in controlling microbiological growth in white water paper mill systems. The required dosages will vary with the degree of microbiological and process contamination present. Depending on the specific requirements of the system, sodium chlorite should be applied continuously or intermittently through a chlorine dioxide generating system to achieve a chlorine dioxide residual concentration between 0.1 and 5.0 ppm. Intermittent treatments should be repeated as often as necessary to maintain control.

Bacterial Control In Oil Wells And Petroleum Systems

Chlorine dioxide is effective in the remediation of bacterial and sulfide contamination commonly found in oilfield production, injection and disposal fluids. The required dosages will vary with process conditions. Sodium chlorite may be applied either continuously or intermittently through a chlorine dioxide generating system to oil well production water as it is separated from the oil, and before it is re-injected into the well.

For continuous feeds, chlorine dioxide may be applied at dosages slightly higher than sulfide's oxidative demand as determined by a demand study. For intermittent treatment, chlorine dioxide should be applied at a shock dosage of 200 - 3000 ppm.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal. Keep product in tightly closed container when not in use. Don't drop, roll or skid drum. Keep upright. Always replace cover. Store in a cool, dry well-ventilated area away from heat or open flame.

EMERGENCY HANDLING: In case of contamination or decomposition, do not reseal container. If possible, isolate container in open and well ventilated area. Flood with large volumes of water. If fire occurs, extinguish fire by applying large quantities of water. Any unopened drums near the fire should be cooled by spraying with water.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse container. 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 out of smoke