

May 21, 2003

Roger E. Etherington
Vulcan Performance Chemicals
1200 Urban Center Drive
Birmingham, AL 35242

Subject: Atka Klor 7.5
EPA Registration No. 21164-9
Submission Dated: March 13, 2003
Receipt Date: March 19, 2003

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 conditions listed below:

- revisions for If Swallowed section PR Notice 2001-1
- revisions per Agency letter dated September 13, 2002

Conditions

1. You must provide a Hotline Telephone number under the First Aid statement as per PR Notice 2001-1.
2. Delete the unsubstantiated claim which reads "Generally, for water treatment, the chlorine dioxide solution is applied to achieve residual concentration of 10 ppm or less" from "Feed Requirements" directions for use.

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	7510 C							
SURNAME	Mitchell							
DATE	5-21-03							

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

Sincerely,



*Robert S. Brennis
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)*

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AKTA KLOR 7.5

CHLORINE DIOXIDE PRECURSOR FOR MICROBIAL CONTROL IN WATER AND WASTEWATER AND ON HARD SURFACES

ACTIVE INGREDIENTS:	
Sodium Chlorite	7.5%
INERT INGREDIENTS.....	92.5%
TOTAL.....	100.0%

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:**
 - 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.
 - Do not give anything by mouth to an unconscious person.
- If inhaled:**
 - 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.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

ACCEPTED
with COMMENTS
 EPA Letter Dated:
 MAY 21 2003

MANUFACTURED BY:

Vulcan

Performance Chemicals

P. O. Box 385015, Birmingham, AL 35238-5015

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No. 21164-9

EPA Reg. No. 21164-9

EPA Est. No. 5382-KS-01
70547-IL-01

Net Contents: _____ gal (_____ liters)

4 7 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE. CAUSES EYE AND SKIN DAMAGE. Harmful if swallowed. Irritating to nose and throat. Avoid breathing vapor. Do not get in eyes, on skin or clothing. Wear goggles or face shield, rubber gloves and protective clothing when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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 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.

PHYSICAL OR CHEMICAL HAZARDS

DO NOT mix with acids or other chemicals except water. Mixing with acid or other chemicals may cause evolution of chlorine dioxide gas, which is poisonous and explosive.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

Storage: Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration. In case of spill, flood the area with large quantities of water.

Pesticide Wastes: 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 (or equivalent) all containers and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE IN THE SANITIZATION OF FOOD CONTACT SURFACES

Use AKTA KLOR 7.5 in combination with FOAM ADD 10 to generate chlorine dioxide containing foam solution for use as a terminal no-rinse sanitizer for food contact surfaces, food processing equipment and utensils. Prior to application of the sanitizing foam, remove gross food particles and soil by a pre-flush or pre-scrape, and when necessary, a pre-soak treatment. Then thoroughly wash all equipment, surfaces and utensils with a suitable detergent or cleaner, followed by a potable water rinse.

Application of the foam sanitizing solution can be accomplished by manually combining 15 oz. of FOAM ADD 10 with 2.5 oz. of AKTA KLOR 7.5, gently mixing for ten minutes and then immediately diluting with water to ten gallons. Alternatively, use the *Rio Linda Chemical Portable Foamer* or a centrally located installed system to mix the components, at the use levels noted above. Cover the entire area being treated with the foam sanitizer to a depth of 1/4-1". A contact time of at least one minute is required for sanitization. Allow the foam sanitizer to thoroughly drain and dry from all equipment and surfaces prior to recontact of the sanitized surface with food or feed items.

The efficacy of AKTA KLOR 7.5 was demonstrated to be equivalent to that of ≥ 200 ppm NaOCl when tested against *Salmonella typhi*.

DIRECTIONS FOR USE IN THE MECHANICAL OR ELECTROLYTIC GENERATION OF CHLORINE DIOXIDE AS A DISINFECTANT, OR FOR MICROORGANISM CONTROL IN WATER AND WASTEWATER SYSTEMS

AKTA KLOR 7.5 may be used in the mechanical generation of chlorine dioxide for use in controlling microorganisms in water and wastewater systems. AKTA KLOR 7.5 is fed to chlorine dioxide generation equipment, which produces an aqueous solution of chlorine dioxide by one of the following methods of generation:

- (1) The chlorine method, which uses AKTA KLOR 7.5 and chlorine gas;
- (2) The hypochlorite method, which uses AKTA KLOR 7.5 and a combination of a hypochlorite solution, and an acid,
- (3) The acid-chlorite method, which uses AKTA KLOR 7.5 and an acid as the activating agent; or,

(4) The electrolytic method which uses AKTA KLOR 7.5, with sodium chloride added as needed

Your Vulcan Performance Chemicals representative can guide you in the selection, installation and operation of generation systems. Consult the instructions on the chlorine dioxide generation system before using AKTA KLOR 7.5.

FEED REQUIREMENTS

Feed rates of AKTA KLOR 7.5 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, AKTA KLOR 7.5 may be diluted at the point of use to prepare a 3% to 7.5% active aqueous solution for use in chlorine dioxide generators.

In all cases, generated chlorine dioxide solution should be applied in such a manner to ensure adequate mixing and minimal volatilization. The water stream to be treated may either be passed directly through the chlorine dioxide generator or treated via side stream injection point. The generation system employed should be in good working order and capable of achieving chlorine dioxide solutions free from chlorine contamination.

Generally, for water treatment, the chlorine dioxide solution is applied to achieve residual concentrations of 10 ppm or less. Because of the variability of demand in water and process systems, the dosage of chlorine dioxide required to achieve the target residuals is normally lower for continuous feed systems than for slug or timed feed applications. The minimum acceptable residual for chlorine dioxide, as determined by a verified procedure, is 0.1 ppm for a minimum one minute contact time.

Residual determination procedures should be substantiated methods and should also be specific for chlorine dioxide or used in systems where no chlorine contamination is possible. Do not add AKTA KLOR 7.5 directly to process water.

APPLICATIONS

POTABLE WATER AND WASTEWATER DISINFECTION: For most municipal and public potable water systems a chlorine dioxide residual concentration up to 2.0 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. For wastewater and sewage applications, residual chlorine dioxide concentrations up to 5.0 ppm are generally adequate.

FOOD PROCESSING PLANTS, DAIRIES, BOTTLING PLANTS, AND BREWERIES: For microbial control in typical food processing water systems, such as flume transport, chill water systems, hydrocoolers, beverage and brewery pasteurizers and bottle rinsing, apply AKTA KLOR 7.5 through a chlorine dioxide generation system to achieve a chlorine dioxide residual concentration ranging from 0.25 to 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.

POULTRY PROCESSING WATER: Use AKTA KLOR 7.5 to generate chlorine dioxide for use as an antimicrobial agent in water used in poultry processing in an amount not to exceed 3 ppm residual chlorine dioxide as determined by an appropriate method in accordance with 21CFR § 173.300.

AQUEOUS DISINFECTION SYSTEMS FOR CIP CLEANING: If the concentration of chlorine dioxide generated from AKTA KLOR 7.5 exceeds 5.0 ppm, a potable water rinse should follow treatment. Care should be taken to ensure the biological and chemical quality of the potable water.

GENERAL INDUSTRIAL PROCESS WATER TREATMENT (OILFIELD INJECTION WATER, WHITE WATER PAPER MILL SYSTEMS, AND RECIRCULATING COOLING TOWERS): For control of microbial slime, these systems will require a chlorine dioxide residual concentration ranging between 0.25 and 5.0 ppm. The AKTA KLOR 7.5 dosage needed to achieve these levels will vary widely depending on the exact application.

Please consult your Vulcan Performance Chemicals representative for assistance in determining the correct dosage level.

