

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 30 1994

Lee R. Zimmerli
Great Western Chemical Co.
808 SW 15th Avenue
Portland, OR 97205

Subject: G.W. Sani-Clean
EPA Registration No. 33003-1
Your Amendment Dated September 13, 1993

Dear Mr. Zimmerli:

This is in response to your labeling with revised directions for use.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy is enclosed for your records. Five copies of the finished labeling must be submitted before the product is released for shipment bearing the amended labeling.

1. Expand the first sentence after the ENVIRONMENTAL HAZARDS heading to read, "This pesticide is toxic to fish and aquatic organisms."

2. Align the headings ACTIVE INGREDIENTS and INERT INGREDIENTS to the same margin.

3. The Statement of Practical Treatment (First Aid) must appear on the front panel (the panel with the ingredients statement and product name). It is not clear from the draft whether it actually does.

4. In the "If Swallowed" instructions in the Statement of Practical Treatment, delete the reference to "milk".

CONCURRENCES

| SYMBOL | | | | | | | | |
|---------|--|--|--|--|--|--|--|--|
| SURNAME | | | | | | | | |
| DATE | | | | | | | | |

If you have any questions about these comments, please call Wallace Powell at 703-305-6938.

Sincerely,



Ruth G. Douglas
Product Manager 32
Antimicrobial Program Branch
Registration Division (7505C)

Enclosure

G.W. SANI-CLEAN

For Swimming Pool Chlorination and Sanitizing

ACTIVE INGREDIENT

| | |
|------------------------------|--------|
| SODIUM HYPOCHLORITE. | 12.5% |
| INERT INGREDIENTS. | 87.5% |
| TOTAL | 100.0% |

ACCEPTED
with COMMENTS
in EPA Letter Dated

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the Pesticide
registered under EPA Reg. No.
33003-1

KEEP OUT OF REACH OF CHILDREN

DANGER

See other precautions on side panel

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: Corrosive, causes eye damage. May cause severe skin irritation or chemical burns to broken skin. Do not get in eyes, on skin or on clothing. Wear chemical goggles and rubber gloves when handling this product. Wash thoroughly after handling. Do not breathe vapors. Vacate poorly ventilated areas as soon as possible. Do not return until odors have dissipated.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically indentified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS: STRONG OXIDIZING AGENT. Mix G.W. Sani-Clean only with water according to the label directions. Do not mix this product with chemicals (e.g. ammonia, acids, detergents, etc.) or organic matter (e.g. urine, feces, etc.) which will release chlorine and other hazardous gases which are irritating to eyes, lungs and mucous membranes.

STATEMENT OF PRACTICAL TREATMENT (FIRST AID): If in eyes, flush eyes with plenty of clean water for at least 15 minutes lifting the upper and lower lids occasionally. Call a physician immediately. If on skin, flush with plenty of clean water and wash with soap and water. If irritation occurs, get medical attention. If swallowed, do NOT induce vomiting. Immediately give a large quantity of milk or water to drink. Never give anything by mouth to an unconscious person. Call a physician or poison control center immediately.

DIRECTIONS FOR USE

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

BEST AVAILABLE COPY

DIRECTIONS FOR SWIMMING POOL CHLORINATION

For a new pool or spring start-up, superchlorinate with 52 to 104 oz. of product for each 10,000 gallons of water to yield 5 to 10 ppm available chlorine by weight. Check the level of available chlorine with a test kit. Adjust and maintain pool water pH to between 7.2 to 7.6. Adjust and maintain the alkalinity of the pool to between 50 and 100 ppm.

To maintain the pool, add manually or by a feeder device 10 oz. of G.W. Sani-Clean for each 10,000 gallons of water to yield an available chlorine residual between 0.6 to 1.0 ppm by weight. Stabilized pools should maintain a residual of 1.0 to 1.5 ppm available chlorine. Test the pH, available chlorine residual and alkalinity of water frequently with appropriate test kits. Frequency of water treatment will depend upon temperature and number of swimmers.

Every seven days, or as necessary, superchlorinate the pool with 52 to 104 oz. of G.W. Sani-Clean for each 10,000 gallons of water to yield 5 to 10 ppm available chlorine by weight. Check the level of available chlorine with a test kit. Do not reenter pool until the chlorine residual is between 1.0 to 3.0 ppm.

At the end of the swimming pool season or when water is to be drained from the pool, chlorine must be allowed to dissipate from treated pool water before discharge. Do not chlorinate the pool within 24 hours prior to discharge.

DISINFECTION OF DRINKING WATER

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Mix a ratio of 1 oz. of this product to 100 gallons of water. Begin feeding this solution with a hypochlorinator until a free available chlorine residual of at least 0.2 ppm and no more than 0.6 ppm is attained throughout the distribution system. Check water frequently with a chlorine test kit. Bacteriological sampling must be conducted at a frequency no less than that prescribed by the National Interim Primary Drinking Water Regulations. Contact your local Health Department for details.

Accepted with Comments in EPA Letter Dated

SEP 30 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide registered under EPA Reg. No. 33003-1

PULP AND PAPER MILL PROCESS WATER SYSTEMS

SLUG FEED METHOD

Initial Dose: When system is noticeably fouled, apply 52 to 104 oz. of this product per 10,000 gallons of water in the system to obtain from 5 to 10 ppm available chlorine. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 11 oz. of this product per 10,000 gallons of water in the system daily, or as needed to maintain control and keep the chlorine residual at 1 ppm. Badly fouled systems must be cleaned before treatment is begun.

INTERMITTENT FEED METHOD

Initial Dose: When system is noticeably fouled, apply 52 to 104 oz. of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine. Apply half (or 1/3, 1/4, or 1/5) of this initial dose when half (or 1/3, 1/4, or 1/5) of the water in the system has been lost by blowdown.

Subsequent Dose: When microbial control is evident, add 11 oz. of this product per 10,000 gallons of water in the system to obtain a 1 ppm residual. Apply half (or 1/3, 1/4, or 1/5) of this initial dose when half (1/3, 1/4, or 1/5) of the water in the system has been lost by blowdown. Badly fouled systems must be cleaned before treatment is begun.

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CONTINUOUS FEED METHOD

Initial Dose: When system is noticeably fouled, apply 52 to 104 oz. of this product per 10,000 gallons available chlorine. *Under Federal Insecticide, Fungicide, and Rodenticide Act as amended for Pesticide registered under Reg. No. 23300-1*

Subsequent Dose: Maintain this treatment level by starting a continuous feed of 1 oz. of this product per 1,000 gallons of water lost by blowdown to maintain a 1 ppm residual. Badly fouled systems must be cleaned before treatment is begun.

DIRECTIONS FOR SANITIZING NONPOROUS SURFACES ON FOOD PROCESSING OR DAIRY EQUIPMENT

Prepare a sanitizing solution by thoroughly mixing 2 oz. of G.W. Sani-Clean per each 10 gallons of water to provide a sanitizing solution containing approximately 200 ppm available chlorine. Clean all equipment surfaces thoroughly in the normal matter and follow with a potable water rinse. Just prior to use, rinse or immerse all surfaces thoroughly with the sanitizing solution, maintaining surface contact with the sanitizing solution for at least two minutes. Allow to drain thoroughly before using the equipment. Do not rinse equipment with water after sanitizing treatment and do not soak equipment overnight. Fresh solution should be prepared at least daily or more often if the solution becomes diluted or soiled.

DIRECTIONS FOR SANITIZING POTABLE WATER IN FOOD PROCESSING PLANTS

G.W. Sani-Clean may be used to sanitize the process water of meat and poultry food processing plants by adding a maximum of one ounce of G.W. Sani-Clean per each 200 gallons of water (provides 5 ppm available chlorine maximum). The G.W. Sani-Clean must be dispensed at a constant and uniform level. The method or system of dispensing must be such that a controlled rate is maintained.

FOOD EGG SANITIZATION. Thoroughly clean all eggs. Thoroughly mix 2 oz. of this product with 10 gallons of warm water to produce a 200 ppm available chlorine solution. The sanitizer temperature should not exceed 130°F. Spray the warm sanitizer so that the eggs are thoroughly wetted. Allow the eggs to thoroughly dry before casing or breaking. Do not apply a potable water rinse. The solution should not be re-used to sanitize eggs.

Authorized by USDA for use in Federally inspected meat, rabbit, shell egg grading, egg products and poultry plants.

OTHER NON-SANITIZING USES

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CLEANING ADDITIVE: G.W. Sani-Clean can be added to alkaline cleaners or their cleaning solutions to enhance that products' cleaning action, especially for the removal of proteinaceous soils. G.W. Sani-Clean should be added in amounts sufficient to accomplish the intended purpose. After the cleaning operation is finished, rinse all surfaces thoroughly with potable water.

WASHING AND PEELING OF FRUITS AND VEGETABLES: G.W. Sani-Clean may be used to wash or to assist in the lye peeling of fruits and vegetables not to exceed 0.2% active ingredient in accordance with the regulations found in 21 CFR 173.315. Mix no more than 2 fluid oz. of G.W. Sani-Clean per gallon of water. Rinse food with potable water.

NOTE: This product degrades with age. Use a chlorine test kit and increase dosage, as necessary, to obtain the required level of available chlorine.

STORAGE AND DISPOSAL

STORAGE: Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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). Then offer for recycling or reconditioning, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

NET CONTENTS: 5, 15, 55 gallons

DOT SHIPPING NAME: Hypochlorite solution containing more than 7% available chlorine by weight. UN-1791

Great Western Chemical Company, 808 SW 15th Avenue, Portland, Oregon 97205

EPA Reg. No. 33003-1 EPA Est. No. 168-UT-1

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