UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 14, 2005

Robin Eddy Bolte Allied Universal Corporation 3901 MW 115th Avenue Miami, FL 33178-1859

Subject:

Compressed Chlorine Gas

EPA Registration No. 33458-1

Submission Date: October 15, 2004 Receipt Date: October 20, 2004

Dear Ms. Bolte:

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 per PR Notices (2000-3 and 2001-1)
- Revisions per August 28, 2003, Agency letter

Condition

Revise the Ingredient statement as follows:

ACTIVE INGREDIENT:

OTHER INGREDIENTS: 0.5%

Total 100.0%

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 75/UC | | | | |
| SURNAME MITCHE! | | | | |
| DATE 1-14-05 | | | | |
| OFFICIAL FILE CODY | | | | |

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

Emily H. Mitchell
Product Manager - Team 32

Regulatory Management Branch II Antimicrobials Division (7510C)

INSERT: [DOT HAZARD WARNING LABEL PER 49 CFR §172.416(a)]

COMPRESSED CHLORINE GAS (CHLORINE LIQUEFIED GAS UNDER PRESSURE)

Chlorine, Hazard Class 2.3 (8), UN1017, Poison-Inhalation Hazard Zone B, RQ

Allied Universal Corp.
3901 NW 115 Ave. Miami, FL 33178
(305) 888-2623
24 Hr. Chemical Spill Emergency Pager: (305) 483-7732

INSERT: [NSF MARK SYMBOL, ANSI/NSF Standard 60]

Net Contents: 150 lbs. , 2000 lbs.

DANGER: Empty Cylinders and Tons Contain Chlorine Residue. Always Return Empty Cylinders and Tons with Valve Protective Housing.

DO NOT REMOVE THIS TAG

FOR USE AS A DISINFECTANT, by experienced personnel only. In municipal water supplies, sewage and water management plants and industrial, residential and commercial swimming pools. Certified to ANSI/NSF Standard 60. Maximum use in potable water is 30 mg/L.

ACTIVE INGREDIENT: Chlorine 99.5% INERT: .5%

KEEP OUT OF REACH OF CHILDREN

DANGER POISON

(NOTE: THE SKULL & CROSS BONE WILL BE IN RED ON WHITE BACK GROUND IN THE FINAL LABEL)

ACCEPTED
with COMMENTS FATAL IF INHALED.

EFA Letter LIQUID CHLORINE CAUSES SEVERE BURNS.

JAN 1 4 2005

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PRECAUTIONARY STATEMENTS

| ROUTE OF EXPOSURE | FIRST AID |
|---|--|
| INHALATION | If inhaled, move person to fresh air and get medical attention immediately. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. If breathing is difficult, oxygen should be administered by qualified personnel. Call poison control center or medical physician for treatment advice. |
| SKIN IRRITATION (SKIN OR CLOTHING CONTACT WITH LIQUID CHLORINE) | In case of skin contact, immediately flush skin with plenty of water for at least 30 minutes while removing contaminated clothing and shoes. Get medical attention immediately. Wash clothing before reuse. Destroy contaminated shoes. |
| SKIN IRRIATION (CONTACT WITH GASEOUS CHLORINE) | In case of skin contact, immediately flush skin with plenty of water for at least 30 minutes while removing contaminated clothing and shoes. Get medical attention immediately. Wash clothing before reuse. Destroy contaminated shoes. |
| INGESTION | If swallowed, call poison control center or medical physician immediately for treatment advice. Have the product label with you when calling or going for medical treatment. Have exposed person sip a glass of water if able to swallow. DO NOT INDUCE VOMITING unless told to do so by a poison control center or medical physician. DO NOT give anything by mouth to an unconscious person. |
| EYE | In case of eye contact, immediately flush eyes with plenty of water for at least 30 minutes. Remove contact lenses, if present, after the first 5 minutes then continue rinsing eyes. Get medical attention immediately. |
| NOTE TO PHYSICIAN | Symptoms may become more severe up to 36 hours after exposure including pulmonary edema. Probable mucosal damage may contraindicate the use of gastric lavage. |
| | NER OR LABEL WITH YOU WHEN CALLING A POISON CAL PHYSICIAN, OR GOING FOR TREATMENT. |

HAZARDS TO HUMANS 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

Personal protective equipment requirements will vary depending on how the chlorine is being used. Refer to Chlorine Institute Pamphlet # 65 for specific recommendations. Applicators and other handlers must wear long-sleeved shirts, long pants, shoes and socks.

In Case of Spill or Leakage: Under normal use conditions, no protective eyewear, respirator, or gloves are required. However, in case of a leak, handlers must wear chemical-resistant gloves (such as any waterproof material) and a full-face canister-style (gas-mask) respirator with a canister approved for chlorine (MSHA/NIOSH approved number prefix TC-14G). Since there is always the possibility of a leak, gloves and a respirator of a type specified above must be available. Gloves and respirator are required for anyone entering into an affected area in the event of a leak.

ENVIRONMENTAL HAZARDS

This pesticide is toxic or highly toxic to fish and aquatic invertebrates. 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 AND CHEMICAL HAZARDS

Chlorine is a non-flammable gas stored and shipped as a liquefied gas under pressure. Do not drop or heat the container. Keep away from heat. Chlorine is corrosive to most metals in the presence of moisture.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Before working with this product, handlers must be trained how to appropriately handle and use chlorine. Use only in well ventilated areas.

Refer to the appropriate Chlorine Institute Pamphlet for instructions on the required product use and safety procedures. NEVER TAMPER WITH FUSIBLE PLUGS OR ATTEMPT TO ALTER OR REPAIR CYLINDERS, TONS OR VALVES. This product, including dispensing equipment, must be handled and used in accordance with the practices specified by all applicable product labeling and the appropriate Chlorine Institute Pamphlet. To contact the Chlorine Institute, call (703) 741-5760 or visit its website at www.CL2.com.

| Chlorine Manual | CI Pamphlet #1 |
|-------------------------------|------------------|
| Piping Systems | CI Pamphlet #6 |
| Chlorine Packaging Plants | CI Pamphlet #17 |
| Cargo Tank Handling | CI Pamphlet #49 |
| Emergency Response | CI Pamphlet #64 |
| Personal Protective Equipment | CI Pamphlet #65 |
| Railcar Handling | CI Pamphlet #66 |
| Cylinders at Swimming Pools | CI Pamphlet #82 |
| Swimming Pool Applicators | CI Pamphlet #97 |
| Potable Water Treatment | CI Pamphlet #155 |
| Wastewater Treatment | CI Pamphlet #155 |

Applications:

Only for formulation into an algaecide, slimicide, disinfectant or sanitizer and for the following uses(s):

As a disinfectant in potable and wastewater treatment,

As a disinfectant and algaecide in non-residential swimming pools,

As a disinfectant and algaecide in pulp and paper process water systems, and

For cooling tower water treatment,

As a sanitizer for wash water treatment of food handling premises and equipment,

For wash water for raw agricultural commodities and certain other food commodities,

For repackaging into smaller containers, or

For manufacture of sodium hypochlorite.

The registrant is solely responsible for the safety of the servicing equipment used with this pesticide, and for the repackaging of this gas from the larger containers into portable cylinders and ton containers. Each repackager must obtain its own EPA Registration Number for this pesticide for this use, and its own EPA Establishment Number from the EPA. Repackagers may only dispense this product to portable containers that are approved for chlorine and are appropriately labeled.

STORAGE AND DISPOSAL

STORAGE: Store cylinders and ton containers in a dry area away from sources of heat and protected from intense sunlight. Do not store in excessive heat. Segregate chlorine containers from other compressed gases and never store near hydrocarbons, finely divided metals such as filings or granules, turpentine, ether, anhydrous ammonia, or other flammable materials. All storage containers and cylinders must have a weather resistant label and must not be accessible to the general public. Do not drop container. If container is damaged or leaking, refer to procedures in the Chlorine Manual and the appropriate Chlorine Emergency Kit Manual and/or notify supplier immediately.

LEAK PROCEDURES: Make daily inspections for leaks. Stop a leak at once since it will become worse with time. In case of leak, follow your site's Emergency Response Plan. It is illegal to ship a leaking chlorine container.

DISPOSAL OF CONTAINER: Container is returnable and must be properly identified with return tag and returned as promptly as possible to supplier according to prescribed instructions and practices in CI Pamphlet # 76 for cylinders and ton containers, CI Pamphlet # 49 for chlorine cargo tanks and CI Pamphlet # 66 for tank cars. All valves must be closed tight and closures or caps secured. It is illegal to ship a leaking chlorine container. Follow U.S. DOT regulations for returning empty containers, including proper installation of valve protective housing for all storage and shipments.

THIS PACKAGE CONTAINS NEW SEALING GASKET

[TOTAL OF FIVE DRAWINGS DISPLAYED, ADAPTER AND YOKE, CYLINDER, TON CONTAINER, VALVE AND WRENCH]

EPA REG. No.: 33458-1 EPA EST. No: 33458-FL-1, FL-3, GA-1, GA-2, AR-1, MS-1, AZ-1