36736-2 2-23-99 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ARC Chemical Division Balchem Corporation P.O. Box 180 Slate Hill, NY 10973

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FEB 2 3 1999

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Subject: Ethylene Oxide - 100% EPA Registration No. 36736-2 Amendment Dated November 23, 1998

Attn: Diane Powers VP, Registration

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U.S. GOVERNMENT PRINTING OFFICE : 1997 515-124

The amendment referenced above, submitted in connection with registration under FIFRA, as amended, for a revised updated label is acceptable provided the following issues are addressed before you release the product for shipment.

1. According to the Label Review Manual (2nd Edition), Chapter 6, the ingredient statement should be revised to reflect the following:

Active Ingredient: Ethylene Oxide......100%

The CAS Registry number is not necessary.

2. Under the "Statement of Practical Treatment", the following sentence, "If breathing is difficult, give oxygen", should be added to the "If Inhaled" section, preferably after the second sentence.

A stamped copy of the label is enclosed for your records. Please submit one (1) copy of the final printed label prior to the release of the product for shipment.

If you have any questions regarding this letter, please contact Zenobia Jones at (703) 308-6198.

| CONCURRENCES | | | | | | | | |
|-------------------------|---------|--|---------------------------|---|--|---|--------------------|--|
| SYMBOL | 1510W | | | | | | | |
| SURNAME | | | | | | | | |
| DATE | 2-23-99 | | | } | |] | | |
| EPA Form 1320-1A (1/90) | | | Printed on Recycled Paper | | | | OFFICIAL FILE COPY | |

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Velmo Mole

Velma Noble Product Manager 31 Regulatory Management Branch 1

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER! CAUSES EYE AND SKIN BURNS. HARMFUL IF INHALED. MAY CAUSE NERVOUS SYSTEM DAMAGE.

DANGER! CANCER HAZARD AND REPRODUCTIVE HAZARD.

EFFECTS OF OVEREXPOSURE: May be fatal if inhaled in high concentrations. May cause irritation of the respiratory tract, chest tightness, headache, nausea, vomiting, diarrhea, tight-headed feeling, dizziness, weakness, drowsiness, cyanosis, loss of coordination, convulsions, coma, delayed lung injury (fluid in the lungs), immediate or delayed skin irritation or blisters, allergic skin reaction.

OTHER POSSIBLE DELAYED HEALTH EFFECTS: May cause nervous system injury, cataracts, adverse reproductive effects, chromosomal and mutagenic changes, and cancer.

 PEL:
 1 PPM TWA (as per the Ethylene Oxide Standard 29CFR1910.1047).

 EL:
 5 PPM - excursion limit 15 minutes

 ODOR:
 Ether-like at high concentrations. Exposure to toxic levels may occur without warning to or detection by the user.

PRECAUTIONS - Do not breathe vapor. Do not swallow. Do not get in eyes, on skin, or on clothing. Store and use with adequate ventilation in accordance with the Ethylene Oxide Standard (29 CFR1910.1047).

PHYSICAL OR CHEMICAL HAZARDS:

DANGERI - HIGHLY FLAMMABLE LIQUID AND GAS UNDER PRESSURE.

Contents under pressure. Do not use near flame, sparks, hot surfaces, or allow sources of ignition near the sterilization/furnigation area. Ethylene Oxide is extremely flammable and reactive. Ground all equipment (including this container) to prevent sparks.

LEAK - In case of leak evacuate area and keep personnel upwind. Shut off all sources of ignition. Use self-contained breathing apparatus and protective clothing, and shut off leak if without risk.

FIRE - In case of fire move container away from fire if without risk. Use water spray or tog nozzle to keep container cool.

ENVIRONMENTAL HAZARDS:

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 Effluent 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.

ETHYLENE OXIDE

STERILANT/FUMIGANT

ACTIVE INGREDIENT ETHYLENE OXIDE 100% BY WEIGHT

CAS REGISTRY NUMBER 75-21-8

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO

PRECAUTION AL USARIO: Si usted no lee Ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Users must follow requirements of the OSHA Occupational Exposure Standard for ethylene oxide (29CFR1910.1047).

STATEMENT OF PRACTICAL TREATMENT

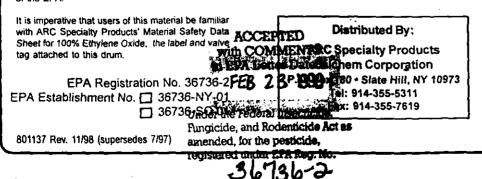
IN ALL CASES OF OVEREXPOSURE GET MEDICAL ATTENTION IMMEDIATELY. TAKE PERSON TO A DOCTOR OR EMERGENCY TREATMENT FACILITY AT ONCE.

IF INHALED - Remove exposed person to fresh air. Keep warm. If breathing has stopped, administer artificial respiration or oxygen. Do not give anything by mouth to an unconscious person. Call a physician even if no symptoms are present. Keep under medical observation. Symptoms may be delayed.

IF ON SKIN - Immediately remove contaminated clothing and shoes. Wash contaminated area thoroughly with soap and water. Call a physician. Aerate, wash or clean contaminated clothing and discard leather goods. IF SWALLOWED - Give at least two glasses of water. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Call a physician.

IF IN EYES - Hold eyelid open and flush with a steady, gentle stream of water for at least 15 minutes. Call a physician.

NOTE TO PHYSICIAN - Skin exposure to Ethylene Oxide will commonly result in skin irritation with extensive blister formation. At high concentrations, severe conjunctivitis can occur. Irritation of the respiratory tract may occur, but without acute lung edema. Symptoms of systemic intoxication are headache, nausea, vomiting, incoordination, and cardiac irregularities. Treatment is symptomatic. Refer to ARC Specialty Products' Ethylene Oxide MSDS. If unable to locate MSDS for this product, please call ARC Specialty Products at the telephone number below and request that one be sent immediately.



Net Contents:

| 400 | lb. | |
|-----|-----|--|
| 175 | lb. | |
| 20 | lb. | |

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DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. It is the employer's responsibility to follow the requirements of the Ethylene Oxide Standard (29CFR1910.1047). This product may be used only in facilities that meet the requirements of the Ethylene Oxide Standard (29 CFR 1910.1047). This product may be used only in non-portable (commercial) vacuum or gas-tight chambers designed for use with 100% ethylene oxide. This product may be used only by persons who have been trained in accordance with the Ethylene Oxide Standard (29 CFR 1910.1047). When used to stenlize health care items, this product must be used in non-portable (commercial) ethylene oxide gas sterilizers that have FDA clearance.

1. AS A STERILANT AND FUMIGANT GAS:

A. For complete use directions (including type of surfaces, objects, or items/products recommended for treatment, pre-cleaning instructions, concentration of gas per unit volume of closed space to be treated, exposure time/temperature, relative humidity, ventilation/aeration time, and method of monitoring to be used) refer to the ethylene oxide gas sterilizer manufacturers' Operators Manuals.

This product may be used only to sterilize medical or laboratory items, pharmaceuticals, and aseptic packaging (see 21 CFR 201.1(4d)) or to reduce microbial load on cosmetics, whole and ground spices or other seasoning materials (see 40CFR 180.151 and 40CFR 185.2950), and artifacts, archival material or library objects.

B. Sterilization/fumigation with Ethylene Oxide must be performed only in vacuum or gas tight chambers designed for use with Ethylene Oxide.

C. Ethylene Oxide cycle parameters depend on several sterilizing/fumigating variable factors: preconditioning (if any); exposure time; chamber air pressure; gas concentration; types and quantities of items to be sterilized/fumigated; packaging; load configuration in the chamber; microbial challenge method; desired degree of disinfection; and the desired performance of the sterilized/fumigated product and package.

D. The sterilization/fumigation cycle parameters should be those prescribed by the equipment manufacturer. If other cycle parameters are used, the safety and efficacy of the alternate cycle parameters must be validated and are the responsibility of the user. NEVER USE PARAMETERS WHICH ALLOW FLAMMABLE MIXTURES OF ETHYLENE OXIDE AND AIR TO ENTER THE CHAMBER.

2. INSTALLATION AND OPERATION OF THE CONTAINER -Follow the directions on the valve tag attached to this container.

STORAGE & DISPOSAL

Use in accordance with tag attached to valve. Store in cool, well ventilated area. Avoid exposure to heat or direct sunlight as may cause polymerization. When empty, return to supplier only. Before returning container to supplier:

tainer to supplier: 1. Pressurize container with hitrogen to 50 psig total pressure at 70 degrees F.

Replace valve plugs lightly in valve outlets.
 Check container valve and plugs for leaks prior to

