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FEB 23 1999

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

Subject: Sterilizing Gas 6
EPA Registration No. 36736-6
Your Amendment Dated: 11/23/98

Attention: Ms. Diane Powers,
VP of Registration

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	12.0 %
Inert Ingredient:	Chlorodiflouromethane	88.0%
Total:	100.0%

The CAS Registry number is not necessary.

2. Under the "Statements 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 Jacqueline Campbell at

(703) 308-6416.

CONCURRENCES

SYMBOL	7570C						
SURNAME	Campbell						
DATE	2/23/99						

EPA Form 1320-1A (1/90)

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Sincerely,



Velma Noble
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510C)

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, light-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: DANGER! - 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/fumigation area. Sterilizing Gas 6 is extremely flammable and reactive. Ground all equipment (including this container) to prevent sparks.

WARNING - Contains dichlorodifluoromethane, a substance which harms public health and the environment by destroying ozone in the upper atmosphere.

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 fog 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 sewerage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

It is imperative that users of this material be familiar with ARC Specialty Products' Material Safety Data Sheet for Sterilizing Gas 6, the label and valve tag attached to this drum.

EPA Registration No. 36736-6
EPA Establishment No. 36736-NY-01
36736-SC-02

801467 Rev. 11/98 (supersedes 7197)

STERILIZING GAS 6

STERILANT/FUMIGANT

ACTIVE INGREDIENTS:

ETHYLENE OXIDE 12% BY WEIGHT (CAS REGISTRY NUMBER 75-21-8)

CHLORODIFLOUROMETHANE: 88% BY WEIGHT (CAS REGISTRY NUMBER 75-71-8)

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 OVER EXPOSURE GET MEDICAL ATTENTION IMMEDIATELY. TAKE PERSON TO A DOCTOR OR EMERGENCY TREATMENT FACILITY AT ONCE.

IN CASE OF CONTACT - immediately flush eyes or skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Call a physician. Aerate, wash or clean contaminated clothing and discard leather goods.

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 Sterilizing Gas 6 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' Sterilizing Gas 6 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: _____ lbs.

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 12% ethylene oxide, 88% chlorodifluoromethane. 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 sterilize 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 185.2850), and artifacts, archival material or library objects.

B. Sterilization/fumigation with Sterilizing Gas 6 must be performed only in vacuum or gas tight chambers designed for use with Sterilizing Gas 6.

C. Sterilizing Gas 6 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:

- 1. Pressurize container with nitrogen to 50 psig total pressure at 70 degrees F.
2. Replace valve plugs tightly in valve outlets.
3. Check container valve and plugs for leaks prior to shipment.

USE THIS PRODUCT WITHIN 120 DAYS OF ITS PURCHASE.

Distributed By: ARC Specialty Products, Balchem Corporation, P.O. Box 180 - State Hill, NY 14878. Tel: 914-355-5311 Fax: 914-355-7619

with COMMENTS in EPA Letter Dated: 2/23/99. Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the reasons set forth in the registration decision of the EPA Administrator, this product is registered under FIFRA Section 24(b) as a Restricted Use Pesticide. EPA REGISTRATION NO. 36736-6

DO NOT REMOVE THIS LABEL.