

PM 32 37982-38 5/28/98

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. William Landman
All Pure Chemical Company
13280 Amar Road
Industry, CA 91746

MAY 28 1998

Dear Mr. Landman:

Subject: Bacti-Chlor
EPA Registration No. 37982-38
Your Amendment Dated April 7, 1998

This is in response to your amendment of revised labeling to add an additional use directions for the subject product.

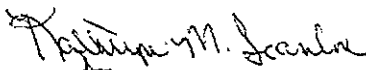
The labeling referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable subject to the following comment.

Revise the "Environmental Hazards" statement to read: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, estuaries, oceans or public 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

A stamped copy is enclosed for your records. Submit one copy of the final printed label.

If you have any questions, please call Marianne Clark at (703) 308-6381.

Sincerely yours,



Robert S. Brennis
Product Manager (32)
Regulatory Management Branch II
Antimicrobial Division (7504C)

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

ALL PURE BACTI-CHLOR

ACTIVE INGREDIENT: SODIUM HYPOCHLORITE11.0%
INERT INGREDIENTS:87.5%

DANGER

KEEP OUT OF REACH OF CHILDREN

FIRST AID: If on skin, wash with plenty of soap and water. If in eyes, flush with water for at least 15 minutes. Get medical attention. If swallowed, drink large amounts of water. DO NOT induce vomiting. Call a physician or poison control center immediately.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

PHYSICAL AND CHEMICAL HAZARDS: Strong Oxidizing Agent: Mix only with water according to label directions. Mixing this product with gross filth such as feces, urine, ect. or with ammonia, acids, detergents or other chemicals may release hazardous gases irritating to eyes, lungs and mucous membranes.

ENVIRONMENTAL HAZARDS: This pesticide 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. 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.

STORAGE AND DISPOSAL: 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 reuse empty container but place in trash collection. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

EPA Reg. No. 37982-38

EPA Est No 37982-CA-1

Manufactured by: All Pure Chemical Co. Tracy, CA 95376
with COMMENTS
in EPA Letter Dated:

MAY 28 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 37982-38

DIRECTIONS FOR USE:

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

The plugging of drip irrigation emitters is a universal problem which will cause a lack of water application uniformity. One of the primary causes of emitter plugging is the proliferation of bacteria and algae within the lines and emitters of a drip irrigation system. Bacti-Chlor is an additive which controls both algae and bacterial growth resulting in a uniform distribution of water. The amount of Bacti-Chlor required for injection into the irrigation water to supply a desired dosage in ppm can be calculated by the following equation: $I = \text{gallons of Bacti-Chlor injected/hour}$.

$$I = (0.006) (\text{ppm desired}) (\text{system flow rate in gallons per minute}) / 0.11$$

With a D.P.D chlorine test kit determine the residual chlorine at the emitter farthest from the injection pump. The residual chlorine should be between 1.0 - 2.0 ppm with a water pH of 7.2 - 7.6.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 29 1998

Under the Federal Insecticide,
Fungicide and Rodenticide Act
amended, for the pesticide
registered under EPA Reg. No. 37982-38