UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

- SEP 28 2000

Mr. Karl Moll Pioneer Americas, Inc. 2185 North California Boulevard Walnut Creek, Ca 94596

Dear Mr. Moll:

Subject: Bacti-Chlor

EPA Registration Number 37982-38 Your Amendment Dated June 30, 2000

This is in response to your amendment of revised label to update first aid language 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 with the following comment.

On page 3 of the master label, delete the sentence "This product is a broad-based sanitizer which has many uses. For a copy of the complete usage instructions, contact Pioneer or your Pioneer distributor or dealer." Resubmit a revised 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 (7510C)

CONCURRENCES								
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BACTI-CHLOR

ACTIVE INGREDIENT – Sodium Hypochlorite 11.0% INERT INGREDIENTS 89.0% TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN DANGER

	FIRST AID
If in eyes	 Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
lf on skin or clothing	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes. Call a poison control center or doctor for treatment advice.
If swallowed	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
	HOT LINE NUMBER
Have the product container going for treatment.	or label with you when you call a poison control center or doctor, or when
	NOTE TO PHYSICIAN
Probable mucosal damage m	ay contraindicate the use of gastric lavage.

See other precautions on this label.

Pioneer Americas, Inc. Houston, Texas 77002

EPA REG. NO. 37982-38 EPA EST NO. 61667-CA-1, 61667-CA-2, 61667-LA-1, 61667-NV-1 61667-WA-2, 72423-CA-1,56088-NV-1, 962-CA-1, 11138-CA-1 ,70271-CA-1, 10897-CA-1, CA-2, 550-WA-2

NET CONTIENTS - XXX GALLONS

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

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 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 discharges. 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: Use only according to label directions. Mixing this product with gross filth, such as feces, urine, etc. or with ammonia, acids, detergents, or other chemicals will release hazardous gases which are irritating to eyes, lungs and mucous membranes.

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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.

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

This product is a broad-based sanitizer, which has many uses. For a copy of the complete usage instructions, contact Pioneer or your Pioneer distributor or dealer.

SANITIZATION OF NONPOROUS FOOD CONTACT SURFACES

RINSE METHOD - A solution of 100 ppm available chlorine may be used in the sanitizing solution if a chlorine test kit is available. Solutions containing an initial concentration of 100 ppm available chlorine must be tested and adjusted periodically to insure that the available chlorine does not drop below 50 ppm. Prepare a 100 ppm sanitizing solution by thoroughly mixing 1 oz. of this product with 8 gallons of water. If no test kit is available, prepare a sanitizing solution by thoroughly mixing 2.5 oz. of this product with 8 gallons of water to provide approximately 200 ppm available chlorine by weight.

Clean equipment surfaces in the normal manner. Prior to use, rinse all surfaces thoroughly with the sanitizing solution, maintaining contact with the sanitizer for at least 2 minutes. If solution contains less than 50 ppm available chlorine, as determined by a suitable test kit, either discard the solution or add sufficient product to reestablish a 200 ppm residual. Do not rinse equipment with water after treatment and do not soak equipment overnight.

Sanitizers used in automated systems may be used for general cleaning but may not be re-used for sanitizing purposes.

IMMERSION METHOD - A solution of 100 ppm available chlorine may be used in the sanitizing solution if a chlorine test kit is available. Solutions containing an initial concentration of 100 ppm available chlorine must be tested and adjusted periodically to insure that the available chlorine does not drop below 50 ppm. Prepare a 100 ppm sanitizing solution by thoroughly mixing 1 oz. of this product with 8 gallons of water. If no test kit is available, prepare a sanitizing solution by thoroughly mixing 2.5 oz. of this product with 10 gallons of water to provide approximately 200 ppm available chloring by weight.

Clean equipment in the normal manner. Prior to use, immerse equipment in the sanitizing solution for at least 2 minutes and allow the sanitizer to drain. If solution in EPA Letter Dated:

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contains less than 50 ppm available chlorine, as determined by a suitable test kit, either discard the solution or add sufficient product to reestablish a 200 ppm residual. Do not rinse equipment with water after treatment.

Sanitizers used in automated systems may be used for general cleaning but may not be re-used for sanitizing purposes.

FLOW/PRESSURE METHOD - Disassemble equipment and thoroughly clean after use. Assemble equipment in operating position prior to use. Prepare a volume of 200 ppm available chlorine sanitizing solution equal to 110% of volume capacity of the equipment by mixing the product in a ratio of 2 oz. of product with 8 gallons of water. Pump solution through the system until full flow is obtained at all extremities, the system is completely filled with the sanitizer and all air is removed from the system. Close drain valves and hold under pressure for at least 2 minutes to insure contact will all internal surfaces. Remove some cleaning solution from drain valve and test with a chlorine test kit. Repeat entire cleaning/sanitizing process if effluent contains less than 50 ppm available chlorine.

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CLEAN-IN-PLACE METHOD -Thoroughly clean equipment after use. Prepare a volume of a 200 ppm available chlorine sanitizing solution equal to 110% of volume capacity of the equipment by mixing the product in a ratio of 2 oz. of product with 8 gallons of water. Pump solution through the system until full flow is obtained at all extremities, the system is completely filled with the sanitizer and all air is removed from the system. Close drain valves and hold under pressure for at least 10 minutes to insure contact with all internal surfaces. Remove some cleaning solution from drain valve and test with a chlorine test kit. Repeat entire cleaning/sanitizing process if effluent contains less than 50 ppm available chlorine.

SPRAY FOG METHOD - Pre-clean all surfaces after use. Use a 200 ppm available chlorine solution to control bacteria, mold or fungi and a 600 ppm solution to control bacteriophage. Prepare a 200 ppm sanitizing solution of sufficient size by thoroughly mixing the product in a ratio of 2 oz. product with 8 gallons of water. Prepare a 600 ppm solution by thoroughly mixing the product in the ratio of 3 oz. product with 4 gallons of water. Use spray or fogging equipment which can resist hypochlorite solutions. Always empty and rinse spray/fog equipment with potable water after use. Thoroughly spray or fog all surfaces until wet, allowing excess sanitizer to drain. Vacate area for at least 2 hours. Prior to using equipment, rinse all surfaces treated with a 600 ppm solution with a 200 ppm solution.

AGRICULTURAL USES

DRIP IRRIGATION – The plugging of drip irrigation emitters is a universal problem that 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 crip irrigation system. Bacti-Chlor is an additive that controls both algae and bacterial growth resulting in a uniform addition of water. The amount of Bacti-Chlor required for in EPA Letter?

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injection into the irrigation water to supply a desired dosage in ppm can be calculated by the following equation:

I = (0.006) (ppm desired) (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 ppm and 2.0 ppm with a water pH of 7.2 - 7.6.

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STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spills, flood areas with large quantities of water. If container required a deposit, return it to Pioneer or its distributor for a refund. If container is a "no deposit" container, then triple rinse and discard. Product or rinsate, which can not be used, should be diluted with water and discarded in a sanitary sewer. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

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