



43553-35 8-11-2010 1/6  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

AUG 11 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

CH2O Incorporated  
c/o Kimberly Graham, Regulatory Assistant  
8820 Old Hwy 99 SE  
Olympia, WA. 98501

Subject: Notification dated: June 28, 2010  
Clean Finish  
EPA Registration # 43553-35  
Decision 437346

Dear Ms. Graham:

This acknowledges receipt of your Notification submitted in accordance with the provisions of PR Notice 98-10 under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)9.

**Proposed Notification**

- Revise and Update Storage and Disposal instructions in accordance with Pesticide Registration Notice 2007-4

**General Comments**

- Based on a review of the material submitted, the notification is acceptable.

Should you have any questions or comments concerning this letter, please contact Tom Luminello at (703) 308-8075.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Luminello".

Handwritten initials "for" in cursive script.

Wanda Y. Henson  
Acting Product Manager 32  
Regulatory Management Branch II  
Antimicrobials Division (7510P)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number  
CH2O, Inc. / 43553-35

2. EPA Product Manager

3. Proposed Classification

4. Company/Product (Name)  
CLEAN FINISH

PM# 32

☒ None ☐ Restricted

5. Name and Address of Applicant (Include ZIP Code)

8820 Old Highway 99 SE  
Olympia, WA 98501

☐ Check if this is a new address

6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. \_\_\_\_\_

Product Name \_\_\_\_\_

## Section - II

☐ Amendment - Explain below.

☐ Resubmission in response to Agency letter dated \_\_\_\_\_

☒ Notification - Explain below.

☐ Final printed labels in response to  
Agency letter dated \_\_\_\_\_

☐ "Me Too" Application.

☐ Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146 and 156.156. -(The complete statement required by PR Notice 2007-4 is on the additional page. See attached.)

## Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging

☐ Yes\*  
☒ No

Unit Packaging

☐ Yes  
☒ No

Water Soluble Packaging

☐ Yes  
☒ No

2. Type of Container

☒ Metal  
☐ Plastic  
☐ Glass  
☐ Paper  
☐ Other (Specify) \_\_\_\_\_

\* Certification must  
be submitted

If "Yes"  
Unit Packaging wgt. No. per  
container

If "Yes"  
Package wgt No. per  
container

3. Location of Net Contents Information

☒ Label ☐ Container

4. Size(s) Retail Container

5,15,30,55,275G

5. Location of Label Directions

☒ On Label  
☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product

☒ Lithograph  
☐ Paper glued  
☐ Stenciled

☐ Other \_\_\_\_\_

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name  
Kimberly Graham

Title  
Regulatory Assistant

Telephone No. (Include Area Code)  
360-943-6063

## Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application  
Received  
(Stamped)

2. Signature

3. Title

Regulatory Assistant

4. Typed Name

Kimberly Graham

5. Date

Jun 29, 2010

06/29/2010

Below is the required notification statement from PR Notice 2007-4, which is accompanying the completed EPA form 8570-1 for the 06/29/2010 notification of amendment for the following label:

**CLEAN FINISH -EPA Reg. No.43553-35**

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.



8820 Old Hwy 99 SE, Olympia, WA 98501 TEL (360) 943-6063 FAX (360) 352-4813 www.ch2o.com

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June 28, 2010

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-0001

SUBJECT: Notification of label changes per PR Notice 2007-4

Dear Madam or Sir:

Enclosed is a pesticide registration amendment application for CH<sub>2</sub>O, Inc.'s **Clean Finish**. The registration is being amended by notification to bring it into compliance with the current regulatory requirements of "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment."


Enclosed you will find the following documents supporting this notification:

- Application for Pesticide Registration, EPA Form 8570-1, with an attachment
- One (1) copy of the new label (with changes highlighted)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Should you have any questions regarding this registration amendment application, please give me a call at the corporate office or you may e-mail me at [kgraham@ch2o.com](mailto:kgraham@ch2o.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberly Graham', written over a horizontal line.

Kimberly Graham  
Regulatory Assistant

Enclosures

# CLEAN FINISH

(15% Active Sodium Chlorite)

## ACTIVE INGREDIENT:

Sodium Chlorite*	15.0%
OTHER INGREDIENTS	85.0%
TOTAL:	100.0%

\*Available chlorine

Contains 1.55 lbs. of sodium chlorite per gallon at 70° C.

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

FIRST AID	
If in eyes:	<ul style="list-style-type: none"><li>•Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>•Call a poison control center or doctor for treatment advice.</li></ul>
If on skin or clothing:	<ul style="list-style-type: none"><li>•Take off contaminated clothing.</li><li>•Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>•Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed:	<ul style="list-style-type: none"><li>•Call a poison control center or doctor immediately for treatment advice.</li><li>•Have person sip a glass of water if able to swallow.</li><li>•Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>•Do not give anything by mouth to an unconscious person.</li></ul>
If inhaled:	<ul style="list-style-type: none"><li>•Move person to fresh air.</li><li>•If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>•Call a poison control center or doctor for further treatment advice.</li></ul>
NOT TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	
HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact 1-800-424-9300 24 hours a day for emergency medical treatment information.	

EPA REG No. 43553-35 / EPA EST. No. 43553-WA-1

Manufactured by:



**CH<sub>2</sub>O, Incorporated**

8820 Old Hwy. 99 SE / Olympia, WA 98501 / (360) 943-6063

NET CONTENTS: \_\_\_\_\_ G / \_\_\_\_\_ L

## PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS & DOMESTIC ANIMALS

**DANGER: Corrosive.** Causes eye and skin damage. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Avoid breathing mists or fumes. Wear protective eyewear (goggles, face shield or safety glasses), protective clothing and rubber gloves when handling this product. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove and wash contaminated clothing before reuse.

**ENVIRONMENTAL HAZARDS:** This product is toxic to fish, aquatic invertebrates, oysters, and shrimp. 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.

**CHEMICAL HAZARDS:** Dry sodium chlorite is a strong oxidizing agent. This product becomes a fire or explosive hazard if allowed to dry. Mix only into water. Contamination may start a chemical reaction with generation of heat, liberating hazardous gases (chlorine dioxide, a poisonous, explosive gas), and possible fire and explosion. Do not contaminate with garbage, dirt, organic matter, household products, chemicals, soap products, paint products, solvents, acids, vinegar, beverages, oils, pine oil, dirty rags, or any other foreign matter.

## DIRECTIONS FOR USE

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

CLEAN FINISH may be used alone or in chlorine dioxide generators. CLEAN FINISH controls the growth of microorganisms (algae, bacteria, slime and mollusks) found in aquatic environments such as food processing flumes, cooling water towers, potable water, irrigation line networks, wastewater treatment plants, poultry chill water, and other water-using equipment. CLEAN FINISH is also used to make sanitizing rinses in food processing plants.

CLEAN FINISH may be used to generate chlorine dioxide in mechanical or electrolytic generators which acts as a sanitizer or chemical oxidant in industrial applications such as

- Disinfection of and removal of sulfides in potable water.
- Bacterial slime, algae and mollusk control in industrial recirculating and one-pass cooling water systems, in food processing flumes, irrigation line networks, water-using equipment, cooling water, and recycled waters.
- Disinfection of plant and sewage wastes.
- Oxidative degradation of phenolics, simple cyanides and sulfides in treatment of wastewater.
- Control of bacterial slime in white water paper mill systems.

Follow the directions in the table below for how to use CLEAN FINISH in different systems. Also refer to the Technical Bulletins for the different uses of CLEAN FINISH.

## DIRECTIONS FOR USE OF CLEAN FINISH ALONE RECIRCULATING COOLING WATER TOWERS

### TARGET ORGANISMS: Algae

Before using CLEAN FINISH, clean all badly fouled systems. The CLEAN FINISH dose is to be added directly into the cooling tower cold water basin (tower drip pan) which is found near the inlet to the recirculating pump.

**Application when algae are first detected:** The initial dose is 14 fluid ounces of CLEAN FINISH per 1,000 gals. of water in the system. Make repeat applications if needed to ensure control.

**Application when algae are under control:** To maintain control, add 7 fluid ounces of CLEAN FINISH solution per 1,000 gals. of water to the system two times a week or as needed.

## DIRECTIONS FOR GENERATION OF CHLORINE DIOXIDE USING CLEAN FINISH AQUATIC SYSTEMS

### TARGET ORGANISMS: Microorganisms and Mollusks

CLEAN FINISH can be used in aquatic systems to generate chlorine dioxide (using mechanical or electrolytic generators) which acts as a chemical oxidant to control microorganisms and mollusks or as a disinfectant.

The rates of feed of CLEAN FINISH will vary depending on the degree of contamination and the extent of control desired. The dose rates of CLEAN FINISH will vary depending on the system size and the residual concentration needed to control the organisms.

**Chlorine dioxide generators:** A 3% to 15% active aqueous solution of CLEAN FINISH (depending on the type of generator employed) can be diluted at the point of use. Additional instructions on specific applications may be obtained from CH<sub>2</sub>O's Product Bulletin or from your CH<sub>2</sub>O representative.

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**Method of Feed:** The most common methods used to generate large amounts of chlorine dioxide include:

•The Chlorine Method: use CLEAN FINISH plus chlorine gas.

•The Hypochlorite Method: use CLEAN FINISH, a hypochlorite solution, plus an acid.

•The Acid-Chlorite Method: use CLEAN FINISH plus an acid as the activating agent.

Additional information on feed systems (selection, installation and operation), may be obtained from your CH<sub>2</sub>O representative. Read all instructions for the chlorine dioxide generator before using CLEAN FINISH. The user is responsible for compliance with applicable federal, state and local laws regarding proper use and disposal of the chlorine dioxide generated.

## DIRECTIONS FOR USING CLEAN FINISH

### POULTRY CHILL WATER

**TARGET ORGANISMS:** Microorganisms

Microorganisms are controlled in poultry chill water treated with chlorine dioxide generated from CLEAN FINISH.

**Application:** Add CLEAN FINISH to a chlorine dioxide generator as needed to maintain a residual concentration of up to 3 parts per million (ppm) chlorine dioxide in the chiller water.

**Restrictions:** Do not exceed 3 ppm residual concentration of chlorine dioxide. Water must be analyzed using an appropriate method in accordance with 21 CFR 173.300.

### FOOD PLANT PROCESS WATER TREATMENT (Flume

Water Systems, Chill Water Systems, Hydrocoolers)

**TARGET ORGANISMS:** Microorganisms

Microorganisms are controlled in flume water or other food processing water systems treated with chlorine dioxide generated from CLEAN FINISH. The CLEAN FINISH dose rate will depend on the process conditions, the degree of contamination present, and the requirements of the specific water system.

**Application:** Apply CLEAN FINISH continuously or intermittently through a chlorine dioxide generating system to achieve a chlorine dioxide residual concentration between 0.25 and 5.0 ppm.

**Washing of Fruits and Vegetables:** Fruits and vegetables which are defined as raw agricultural commodities (in accordance with 21 CFR 173.300) may be washed with water containing up to 3 ppm residual chlorine dioxide. After the chlorine dioxide wash, the fruits and vegetables must either be rinsed with potable water, or be blanched, cooked or canned before consumption or distribution in commerce.

### INDUSTRIAL COOLING WATER TREATMENT

(One-Pass or Recirculating)

**TARGET ORGANISMS:** Bacterial Slime and Algae

The CLEAN FINISH dose rate will depend on the exact application and the degree of contamination.

**Application:** For control of bacterial slime and algae, apply CLEAN FINISH through a chlorine dioxide generating system to achieve a chlorine dioxide residual concentration between 0.1 and 1.0 ppm for

continuous doses, or between 0.1 and 5.0 ppm for intermittent doses. A chlorine dioxide concentration of 0.1 ppm is the minimum acceptable residual concentration for a minimum one minute contact time.

### POTABLE WATER

**TARGET ORGANISMS:** Microorganisms

The dosages of CLEAN FINISH will vary with source water conditions and the degree of contamination.

**Application:** An adequate disinfection/oxidation of most municipal and public potable water systems is achieved from a chlorine dioxide concentration of up to 2 ppm. Residual disinfectant byproducts must be monitored as required by the National Primary Drinking Water Regulations (40 CFR 141) and state drinking water standards.

### WATER SYSTEMS

(including sprinkler, drip and other types of irrigation systems and commercial and industrial recirculating and one-pass cooling water systems)

**TARGET ORGANISMS:** Bacteria, Mollusks, and Slime

Use CLEAN FINISH to generate chlorine dioxide in water systems to control bacteria, mollusks, and slime. The dosage of CLEAN FINISH depends on several factors: the water system type, system conditions, the degree of water contamination, and the desired level of control.

**Application:** Apply CLEAN FINISH continuously or intermittently through a chlorine dioxide generating system to achieve a chlorine dioxide residual concentration as noted below:

**Veliger Control:** Target the chlorine dioxide concentration to between 0.1 and 0.5 ppm from continuous dosing.

**Intermittent Dose:** Target the residual chlorine dioxide concentration to between 0.2 and 25 ppm from intermittent dosing. Repeat applications as needed to maintain control.

**Continuous Dose:** Target the chlorine dioxide concentrations to up to 2 ppm from continuous dosing.

### WASTEWATER TREATMENT

**TARGET ORGANISMS:** Microorganisms

The CLEAN FINISH dose rates will vary with water conditions and the degree of contamination present. Adequate disinfection of most municipal and other wastewater systems is achieved from a chlorine dioxide concentration of up to 5 ppm.

**Odor control of sulfides:** For water with pH levels between 5 and 9, a minimum concentration of 5.2 ppm (by wt) of chlorine dioxide should be applied to oxidize 1 ppm of sulfide (measured as sulfide ion).

**For phenol destruction:** For water with pH levels less than 8, 1.5 ppm chlorine dioxide will oxidize 1 ppm phenol. For water with pH levels greater than 10, 3.3 ppm chlorine dioxide will oxidize 1 ppm phenol.

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. Keep product in tightly closed container when not in use. Do not drop, roll or skid drum. Keep upright. Always replace cover. Store in a cool, well ventilated area away from heat or open flame.

**EMERGENCY HANDLING:** In case of contamination or decomposition, do not reseal container. If possible, isolate container in open and well ventilated area. Flood with large volumes of water. If fire occurs, extinguish fire by applying large quantities of water. Any unopened drums near the fire should be cooled by spraying with water.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Non-refillable container. 5 Gallons or Less Do not reuse or refill this container. Offer for recycling if available. Offer for reconditioning if appropriate. Triple Rinse or Pressure Rinse container promptly after emptying.

Triple Rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure Rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds, after the flow begins to drip.

**CONTAINER DISPOSAL:** Non-refillable container. Larger Than 5 Gallons Do not reuse or refill this container. Offer for recycling if available. Offer for reconditioning if appropriate. Triple Rinse or Pressure Rinse container promptly after emptying.

Triple Rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure Rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds, after the flow begins to drip.

**WARRANTY:** As the use of this material is subject to conditions beyond the seller's control, seller makes no warranty express or implied as to this material or its use other than its chemical analysis when packed. To the extent consistent with applicable law, the total liability of seller shall be limited to the purchase price of the product. Any disputes will be settled via arbitration in accordance with purchase details on your invoice.