

49620-4

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 1, 2010

Diana Graham, Agent for **Eka Chemicals, Inc.**
c/o Keller and Heckman
3 Embarcadero Center, Suite 450
San Francisco, CA. 94111

Subject: Purate
EPA Registration Number 49620-4
Application Date: April 29, 2010
Application Received: May 5, 2010

Dear Ms. Graham:

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

Proposed Notification

Update Storage and Disposal instructions on your labeling in accordance with the guidance provided under PR 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,

for A handwritten signature in cursive script, appearing to read "Wanda Y. Henson".

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

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 49620-4	2. EPA Product Manager Wanda Henson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <i>EKA/Purate</i>	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Eka Chemicals, Inc. 1775 West Oak Commons Court Marietta, GA 30062 <input type="checkbox"/> 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

<input type="checkbox"/> Amendment - Explain Below	<input type="checkbox"/> Final printed labels in response to Agency Letter dated _____
<input type="checkbox"/> Resubmission in response to Agency Letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - explain below.

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

Revised Storage and Disposal Statements. Please address correspondence to:

Diana Graham email: graham@khlaw.com phone: 415-948-2805 fax: 415-948-2808
3 Embarcadero Center Suite 450
San Francisco, CA 94111

Section III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
	If "yes," Unit Package wgt.	No. per container	If "Yes," Package wgt.	<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container 300 gal. totes; ISO containers or bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input checked="" type="checkbox"/> Other (accompanying other paper)		

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Diana Graham	Title Staff Scientist	Telephone No. (Include Area Code) 415-948-2805

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 Staff Scientist, Keller and Heckman LLP, Agent
4. Typed Name Diana Graham	5. Date April 29, 2010

Purate®

Alternate Brand Name Eka Purate®

A Precursor Chemical Solution for Use Only in the SVP-Pure® Chlorine Dioxide Generator

This chemical solution is for the use only in the SVP-Pure® Chlorine Dioxide Generator, a pesticide device that produces CHLORINE DIOXIDE absorbed into water. In addition to this precursor, the SVP-Pure® Chlorine Dioxide Generator usually requires a feedstock of 78% sulfuric acid. Please refer to the SVP-Pure® Maintenance and Operations Manual to ensure proper activation.

**-FOR INDUSTRIAL USE ONLY
KEEP OUT OF REACH OF CHILDREN
DANGER/PELIGRO**

FIRST AID	
IF IN EYES	Hold eye open and flush with a directed stream of water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center or doctor for treatment advice.
IF 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 immediately 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF INHALED	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage	
In case of exposure emergency, call Eka Chemicals at (800) 227-5301	

ACTIVE INGREDIENT:

Sodium Chlorate (NaClO3)	40.0%
OTHER INGREDIENTS:	60.0%
TOTAL	100.0%

-FOR INDUSTRIAL USE ONLY- • KEEP OUT OF REACH OF CHILDREN

EKA CHEMICALS, INC. 1775 West Oak Commons Court Marietta, GA 30062-2254 (770) 578-0858	EPA Reg. No. 49620-4 EPA Est. No. 49620-MS-1 _____ EPA Est. No. 62215-CO-1 _____
Net Contents _____ Gallons	

**PRECAUTIONARY STATEMENTS • HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER/PELIGRO**

Purate is corrosive. Causes irreversible eye damage. Causes skin burns. Do not get in eyes or skin or clothing. Wear protective eye wear (goggles or face shield). Wear protective clothing and neoprene gloves. Wash thoroughly with soap and water after handling. May be fatal if inhaled. Remove contaminated clothing and wash before reuse.

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 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

Purate is a strong oxidizing agent. Do not contaminate with dirt, oils or organic matter of any sort. Contamination may cause violent chemical reactions, fire and explosion. Clean up all chemical spills immediately. Allowing spills to dry or concentrate may cause spontaneous combustion. In case of chemical spills, avoid bodily contact and wear appropriate protective equipment.

DIRECTIONS FOR USE

General Directions:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Only for formulation as an antimicrobial for the following uses:

Purate is for use only in the SVP-Pure® Chlorine Dioxide Generator, a pesticide device installed to generate chlorine dioxide for the registered uses listed below. Feed rates for *Purate* are determined by the operator to achieve the desired production rate for chlorine dioxide. As described below, the appropriate production rate will depend on the severity of contamination, the degree of control desired, the size of the system and residual necessary for effective control. For all uses, the point of feed of chlorine dioxide should be below the water

level to prevent volatilization of the chlorine dioxide. Chlorine dioxide must be added to the water stream at a point where adequate mixing and uniform distribution can occur.

Drinking Water Treatment

This product is approved for use in water treatment facilities that produce potable drinking water in compliance with the Safe Drinking Water Act. A typical dosage of chlorine dioxide for water systems is between 0.5 and 5 ppm on a continuous basis. Purate[®] has been approved by the National Sanitation Foundation for use in drinking water systems.

INDUSTRIAL PROCESS WATER USES:

This product is approved for the control of microbial, algal and mollusk populations in industrial process or waste water at the sites listed below. The dosage of chlorine dioxide required is dependent on the specific use; see specific directions below. Purate[®] may be used to treat the following aquatic sites:

Recirculating and non-recirculating cooling water:

To control microbial and algal slime in cooling water systems, an intermittent or continuous application may be used. If using a continuous feed, maintain residual chlorine dioxide concentrations between 0.1 - 1.0 ppm. If using intermittent feed, maintain a residual concentration of 0.1 - 5.0 ppm. In recirculating systems, chlorine dioxide should be added to the drip pan, cold water well, or other points where adequate mixing and uniform distribution can occur. To remove adult mollusks in once-through cooling water systems, an intermittent dose of 0.2 - 25 ppm is necessary; the exact dose is dependent on the infestation present. If a continuous dose is preferred, apply chlorine dioxide at rates that maintain 0.25 - 2 ppm in the cooling water. To prevent settling and attachment of the free swimming larvae of mollusks (veligers), apply a continuous feed to achieve a residual of 0.1 - 0.5 ppm.

Fuel and industrial ethanol fermenters:

To prevent or reduce bacterial contamination and to prevent and control the formation of by products of bacterial contamination. Chlorine dioxide should be added by batch method to achieve an initial dose in the fermenter of 0.1 ppm to 5.0 ppm. Repeat weekly or as signs of bacterial contamination appear. The exact dose of chlorine dioxide will need to be adjusted for levels of contamination, pH and type of contamination.

Textile processing water and pulp and paper process water:

To control microorganisms that form slime in paper process water and that cause blockages of paper mill equipment, and to oxidize slime buildup already present, chlorine dioxide may be applied in an intermittent or continuous dose. Either method of application should maintain a residual concentration of 0.1 - 5.0 ppm of chlorine dioxide in the paper process water. If the system is badly fouled, it must be cleaned prior to treatment with chlorine dioxide. This product can be used as a slimecide for process water used in the manufacture of food-contact paper and paperboard.

Pasteurizer, cannery and retort water systems:

To control odor and reduce bacterial slime in cooling and warming waters such as canning, retort, and pasteurizer process water, chlorine dioxide may be added intermittently to achieve a dose of 0.4 ppm.

Impounded lake, pond and reservoir water, including industrial waste water:

To control microorganisms and algae that cause unacceptable odors and slime, these aquatic sites may be treated with chlorine dioxide on an intermittent basis. Sufficient chlorine dioxide must be added to reach a residual concentration of 5 ppm, in order to achieve adequate control of odor and slime caused by algae and microorganisms.

Sewage and wastewater systems:

For (disinfection/sanitization) of sewage and wastewater, add chlorine dioxide to achieve a residual of up to 5 ppm. To control odors caused by sulfides associated with sewage and wastewater, a minimum of 5.2 ppm chlorine dioxide must be applied to oxidize 1 ppm sulfide (measured as sulfide ion) if the pH is between 5-9. A minimum of 1.5 ppm chlorine dioxide will oxidize 1 ppm phenol if the pH is less than 8; if the pH is greater than 10, a minimum of 3.5 ppm chlorine dioxide is required.

Gas and oil recovery injection water; fracturing system fluids:

To control sulfate reducing bacteria that form colloidal sulfur or iron sulfides, and to oxidize sulfides, a continuous or intermittent application of chlorine dioxide may be used. If using a continuous feed of chlorine dioxide, apply it at rates slightly higher than the sulfide oxidative demand, as determined by a sulfide demand study. If using an intermittent feed, apply a shock dose of 200-3000 ppm chlorine dioxide. Please be certain that this product is not discharged into lakes, streams, ponds, oceans or other waters.

Ultrasonic tank water; photo processing wash water; and leather processing solutions

To control slime caused by microbial populations in these liquid systems, a residual chlorine dioxide concentration between 0.25 to 5.0 ppm is necessary. Chlorine dioxide may be added intermittently, or on a continuous basis to achieve the desired residual; the concentration maintained is dependent on individual systems.

Agricultural Water Uses (Non-Food Contact):

Purate[®] is approved for use in the control of microbial populations in water for the following agricultural non-food contact uses: Drinking water treatment for animals not meant for human consumption (e.g., show and research animals, animals raised for fur to wool; horses, mules or donkeys). Treatment of drinking water tanks for livestock not meant for human consumption can be achieved by intermittent or continuous application of chlorine dioxide. Either method should be monitored, to achieve a residual concentration between 1.0 - 2.0 ppm chlorine dioxide.

This product also may be used to generate chlorine dioxide for non-pesticidal uses such as:	
Oxidizing nutrients	Reducing sludge
Eliminating odors	Clarifying/precipitating organic and inorganic particles
Controlling scale & deposits	Reducing TOC (Total Organic Carbon)
Controlling iron & manganese	Reducing color
Controlling corrosion	Destruction of odors caused by phenolics simple cyanides and sulfides by chemical oxidation

Storage and Disposal Statement for non-refillable containers:

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage and disposal

STORAGE
Store in the original container. Store at ambient temperatures from 40°F to 100°F. Store separately from sulfuric acid precursor and all other acids. Store in fire-resistant area separate from incompatible materials such as acids, powdered metals, organic chemicals, combustible materials and dirt. Clean up spills immediately.

DISPOSAL OF WASTES
Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the 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 HANDLING
Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying.
Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ 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. Turn the container over onto its other 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. Alternatively, 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. Then offer for recycling or reconditioning. If recycling is unavailable, puncture and dispose of container in a sanitary landfill, or by incineration.

Storage and Disposal Statement for refillable containers

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage and disposal

PESTICIDE STORAGE: Store separately from sulfuric acid precursor and all other acids. Store in fire-resistant area separate from incompatible materials such as acids, powdered metals, organic chemicals, combustible materials and dirt. Clean up spills immediately.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the 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 HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

WARRANTY

EKA CHEMICALS, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for purposes stated on such label when used in the SVP-Pure Chlorine Dioxide Generator.

Rev. 8th April 2010

