

49620-7

6/1/2010

10 of 4



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: EKA SC BC 100  
EPA Registration Number 49620-7  
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,  
  
Wanda Y. Henson  
Acting Product Manager 32  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

2010



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 49620-7	2. EPA Product Manager Wanda Henson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>EKA SC BC 100</b>	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. <b>Expedited Review.</b> 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 Container Handling 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. <b>Material This Product Will Be Packaged In:</b>				2. <b>Type of Container</b>	
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	<input checked="" type="checkbox"/> Plastic
	If "yes," Unit Package wgt.	No. per container	If "Yes," Package wgt.	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
* <b>Certification must be submitted.</b>					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container Big bags or cardboard drums		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 for misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Staff Scientist, Keller and Heckman LLP, Agent	6. Date Application Received  (Stamped)
4. Typed Name Diana Graham	5. Date April 29, 2010	

3066



3 Embarcadero Center  
Suite 450  
San Francisco, CA 94111  
Main: 415-948-2800  
Fax: 415-948-2808

April 29, 2010

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

Writer's Direct Access  
Diana Graham  
(415) 948-2805  
graham@khlaw.com

Re: Revised Container Handling Statement for EKA SC BC 100, EPA Registration No. 49620-7

Dear Ms. Henson:

On behalf of Eka Chemicals, Inc. we are submitting a label including a revised container handling statement for non-refillable containers. A revised label was submitted previously as part of the data call-in for sodium chlorate containing products, but Karen Jones of Registration Review was not certain that it would be approved by the required date. In order to meet the deadline, we are submitting the current approved label with the required container handling revisions as a notification. We have included one marked up version of the label to show the changes and five clean copies.

We believe that the language is consistent with the requirements of PR Notice 2007-4 as revised in 2008. If you have any questions, please contact me at 415-948-2805 or by email at [graham@khlaw.com](mailto:graham@khlaw.com).

Sincerely,

Diana Graham

# EKA SC BC 100

A PRECURSOR CHEMICAL FOR USE IN PREPARATION OF SOLUTIONS FOR CHLORINE DIOXIDE GENERATORS

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

## DANGER/PELIGRO

*EKA SC BC 100* is corrosive. Causes irreversible eye damage. Causes skin burns. Do not get in eyes or on skin or clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Chlorine dioxide gas may be fatal if inhaled. Remove contaminated clothing and wash before reuse.

### 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 5 minutes, then continue rinsing eye. 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 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.  
**Emergency Number: 1-800-Chem Trek??**

ACTIVE INGREDIENT:		
Sodium Chlorate (NaClO <sub>3</sub> ) .....	99.0%	
OTHER INGREDIENTS: .....	1.0%	
TOTAL .....	100.0%	

**EKA CHEMICALS, INC.**  
1775 West Oak Commons Court  
Marietta, GA 30062-2254

EPA Reg. No. 49620-7  
EPA Est. No. 49620-MS-1

Net Contents \_\_\_\_ Pounds

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

## DANGER

*EKA SC BC 100* is corrosive. Causes irreversible eye damage. Do not get in eyes or on skin or clothing. Wear protective eyewear (goggles or face shield). Wear protective clothing and neoprene gloves. Wash thoroughly with soap and water after handling. 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

*EKA SC BC 100* 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.

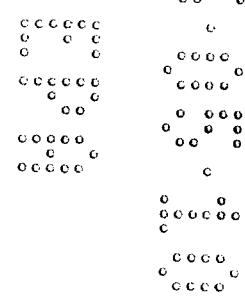
### DIRECTIONS FOR USE

#### 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:

*EKA SC BC 100* is for manufacturing use for preparation of solutions for use in chlorine dioxide generators. Solution concentrations and solution feed rates are determined by the generator based on input provided 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 chlorine dioxide 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.

**Pulp and paper process water for food-contact and nonfood-contact paper:** 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. Chlorine dioxide may also be used to pre-treat make-up water entering the paper process stream. The rate of application is dependent on the quality of the incoming water. 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. For food contact paper, application rates must not exceed 5 ppm in the process water.



### Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal.

**Pesticide Storage:** Store in a cool, dry and fireproof area away from heat sources including friction and impact. Store separate from all other materials, including organic substances, strong acids, phosphorous, sulfur, sulfides, powdered metals, ammonium salts, arsenic, copper, zinc, aluminum, manganese dioxide, potassium cyanide, thiocyanates, expanded plastics such as polystyrene and polyurethane. Drums: Store no more than two high. Store on gravel or crushed stone. Avoid storing on an asphalt-paved area. Bulk: Store in properly designed tank or original container.

**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 use according to the label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

**Container Handling: Nonrefillable container. Do not reuse or refill this container.** BAGS – Completely empty bags into formulation equipment. Offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration. FIBERDRUMS WITH LINERS – Completely empty liner by shaking and tapping sides and bottoms to loosen clinging particles. Empty residue into formulation equipment. Offer for recycling if available or dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

### WARRANTY

EKA CHEMICALS, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for purposes stated on the pesticide label.

April 2010

