

52564-1

08/01/2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

August 1, 2006

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC
SUBSTANCES

Don O'Shaughnessy, Ph.D., DABT
D.O.C. Inc.
21 Birch Parkway
Sparta, NJ 07871

Subject: E. Aragonesas
Saf-T-Chlor
EPA Registration No. 52564-1
Submission Dated: July 12, 2006
Receipt Date: July 17, 2006

Dear Mr. O'Shaughnessy:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA Section 3(c)9.

Proposed Notification

· addition of an alternate brand name: "Saf-T-Chlor Granular"

General Comments

Based on a review of the material submitted, the following comments apply:

The alternate brand name notification is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Henson
Product Reviewer - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

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July 13, 2006

Ms. Emily Mitchell (PM 32)
US EPA, Antimicrobials Division (7503P)
Rm. S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

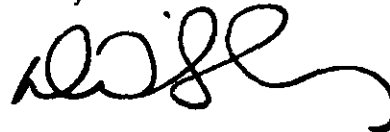
Dear Ms. Mitchell,
RE: NOTIFICATION: Alternate formulation and trade name for Technical Sodium Chlorite 80 Pct, 52564-1

Enclosed is a notification to add an alternate trade name and alternate CSF for the subject product. As shown in the attached copy of a letter from Wanda Henson (EPA) to R. Conlon (E. Aragonesas) dated July 11, 2005, Technical Sodium Chlorite 80 Pct. already has the alternate trade name "Saf-T-Chlor. In this action, we are adding "Saf-T-Chlor Granular" as an alternate trade name.

The formulation is altered only to the extent that the powder is granulated for packaging in dedicated cartridges used in the CDG Technology "Gas : Solid System" chlorine dioxide gas generator. The granulation process adds a small additional amount of residual moisture, and the labeling and alternate CSF have been modified to reflect this. In any case, the product remains 80% sodium chlorite on a dry weight basis. (This use of a "dry weight basis" is not without precedent - for example I have in the past registered a technical glyphosate acid "wet cake" formulation which has variable residual moisture, and the labeling reflects this.) There is no possibility of any confusion by users since this package is not sold as a stand-alone product. Rather it is exclusively for use in the CDG system, and packaged exclusively in sealed cartridges meant for that equipment. The product is used only as directed by the equipment manufacturer, in exactly the same manner as the powder would be used in the same cartridge. I enclose a description of how the product is granulated.

If you have any questions regarding this, please feel free to contact me via telephone or email.

Sincerely



D. O'Shaughnessy
Agent for E. Aragonesas and CDG
Research

Page 1 of 2

DOC

D. O. Shepphessy Consulting, Inc.

List of Enclosures:

- Application form
- Revised labeling (5 copies)
- Alternate CSF (2 copies)
- Copy of original CSF
- Copy of letter from E. Aragonesas to EPA authorizing DOC Inc. to act on their behalf
- Copy of letter from CDG Research to EPA authorizing DOC Inc. to act on their behalf
- Copy of W. Henson letter of July 2005
- Description of the granulation process
- Waiver of PRIA fee information



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|--|--|--|
| 1. Company/Product Number 52564 - 1 | 2. EPA Product Manager E Mitchell | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Energia Aragonesas / Saf-T-Chlor Granular | PM# PM 32 | |
| 5. Name and Address of Applicant (Include ZIP Code) Energia Aragonesas S.A., Paseo de Recoletos 27 Madrid, Spain <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 checked="" 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.)

Alternate brand name and alternate formulation.

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 | |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package wgt | No. per container |
| | | | | <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) Retail Container 30 gal, 55 gal sealed cartridge | | 5. Location of Label Directions <input type="checkbox"/> | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input type="checkbox"/> Other _____ | | | |

Section - IV

| | | |
|--|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | |
| Name Don O'Shaughnessy, Ph.D., DABT | Title Agent / President, D.O.C. Inc. | Telephone No. (include Area Code) 973-726-4533 |
| 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 Agent/ President, D.O.C. Inc. | |
| 4. Typed Name Don O'Shaughnessy | 5. Date July 12, 2006 | |



Aragonesas Industrias y Energía, S.A.
Av. Diagonal, 595
08014 Barcelona, ESPAÑA
ercros@ercros.es

30th June, 2006

Dr. Frank Saunders, Director (ph 703-308-6411)
US EPA, Antimicrobials Division (7510P)
Rm. S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Re: Authorization of Designated Agent

Dear Dr. Saunders:

As a duly authorized officer (OR AGENT) of Aragonesas Industrias y Energía, S.A., I hereby designate D. O'Shaughnessy Consulting, Inc. ("DOC Inc.") to act on behalf of Aragonesas on matters of regulation and registration of its antimicrobial pesticide products in the USA.

Specific contacts are:
Don O'Shaughnesy, Ph.D., DABT, President, DOC Inc., phone 973-726-4533, fax 973-726-4155, email doconst@earthlink.net
Colette O'Shaughnessy, Vice President, DOC Inc. phone 973-726-4532 email jcanucks@earthlink.net

If you should have any questions or need further confirmation of this assignment, please do not hesitate to contact me.

Very sincerely yours,

original signed by JL Amott

Cc: Dr. Don O'Shaughnessy

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SAF-T-CHLOR GRANULAR

ACTIVE INGREDIENT:
 sodium chlorite (dry weight)*80.0%
 OTHER INGREDIENTS*: 20.0%
 Total:.....100.0%

* Residual moisture may vary from 7% to 10%, active ingredient may vary from 71% to 75.4% on a wet-weight basis

KEEP OUT OF REACH OF CHILDREN

DANGER

[Skull and Crossbones]

POISON

| FIRST AID | |
|--|--|
| If on Skin or Clothing | <ul style="list-style-type: none"> • 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 in Eyes | <ul style="list-style-type: none"> • 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 Swallowed | <ul style="list-style-type: none"> • 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. |
| If Inhaled | <ul style="list-style-type: none"> • 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 immediately for treatment advice. |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. | |

EPA Reg. No.: 52564-1

EPA Est. No.: 75757-PA-1

Net Contents:

Manufactured by:
 CDG Research,
 140 Webster St.
 Bethlehem, PA 18015

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER: Highly corrosive. Causes irreversible eye damage and skin burns. Fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Wear protective clothing, goggles or face shield and use neoprene gloves. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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 / PHYSICAL HAZARDS

Strong oxidizing agent. Mix only into water or non-oxidizable materials. Contamination may start a chemical reaction with generation of heat, liberation of chlorine dioxide (a poisonous and explosive gas), and possible fire and explosion. Avoid any contact with flame or burning material, such as a lighted cigarette. Do not contaminate with moisture, 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. Do not use moist or damp utensils.

DIRECTIONS FOR USE

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

For use as a precursor in the generation of chlorine dioxide as a disinfectant, sanitizer, and to control microorganisms.

STORAGE AND DISPOSAL

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

Storage: Keep product in original container. Do not open cartridge except as described for use in the CDG Technology "Gas : Solid System" gas generator. Do not drop, roll or skid cartridge. Always keep cartridge upright. Store in a cool, dry, well-ventilated area away from heat or open flame. Do not store on side. Avoid creasing or impacting of side walls.

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: Return spent cartridges to CDG Technology for re-use.

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.