

August 5, 2003

Cristina Griffin
Delta Analytical Corp.
7910 Woodmont Avenue
Suite 1000
Bethesda, MD 20814

Subject: STERLING PULP CHEMICALS LTD.
Sodium Chlorite Solution 25
EPA Registration No. 53345-10
Submission Dated : June 4, 2003
Receipt Date: June 16, 2003

Dear Ms. Griffin:

The amendment submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions below.

- revisions Per PR Notice 2001-1
- update Environmental Hazard language

Conditions

1. The "Hazard to Humans and Domestic Animals" section of this label states that this product "May be fatal if swallowed or **inhaled**." Therefore, you must revise the "First Aid" statement to include Inhalation.
2. We have removed the "Sterilizing" claim from the label. This product has not been shown to act as a sterilant.
3. Revise the first sentence under the Environmental Hazards statement to read:

This product is toxic to fish and aquatic organisms.

| CONCURRENCES | | | | | | | |
|--------------|----------|--|--|--|--|--|--|
| SYMBOL | 7510C | | | | | | |
| SURNAME | Mitchell | | | | | | |
| DATE | 8-5-03 | | | | | | |

4. Revise the "Hazards to Humans and Domestic Animals" to read:

DANGER: Corrosive. Causes eye and skin damage. Do not get in eyes on skin or on clothing. Wear goggles or face shield, and use only Neoprene gloves when handling. May be fatal if swallowed or inhaled. Irritating to nose and throat. Do not breathe dust, vapors or spray mist. Combustible material contaminated with Sodium Chlorite Solution 25 may burn rapidly. Keep handling areas and equipment clean and free of oils, greases, combustibles and dust. Do not contaminate product with garbage, dirt, vinegar, beverages, oils, pine oils, dirty rags or other foreign matter.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

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

Sincerely,



*Robert S. Brennis
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)*

Sodium Chlorite Solution 25

Chlorine Dioxide
Precursor
FOR MANUFACTURING USE ONLY

FOR USE IN GENERATING CHLORINE DIOXIDE TO CONTROL MICRO-ORGANISMS
IN WATER AND WASTE WATER.

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE PRECAUTIONARY STATEMENTS AND FIRST AID INFORMATION

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, causes eye and skin damage. Do not get in eye, on skin, or on clothing. Wear goggles, or face shield, and use only Neoprene gloves, when handling. May be fatal if swallowed or inhaled. Irritating to nose and throat. Do not breathe dust, vapors or spray mist. Combustible material contaminated with Sodium Chlorite Solution 25 may burn rapidly if ignited. Remove and wash contaminated clothing immediately. Avoid hot surfaces, sparks or open flames. Contact with acids may release toxic gas. Use only clean dry utensils when handling.

PHYSICAL OR CHEMICAL HAZARDS

Strong oxidizing agent. Mix or dilute with water only. Mixing with acids, or alcohol, or other chemicals may cause evolution of chlorine and chlorine dioxide gas mixture which is toxic and may be explosive. Combustible materials contaminated with Sodium Chlorite Solution 25 may burn rapidly. Keep handling areas and equipment clean and free of oils, greases, combustibles and dust. Do not contaminate product with garbage, dirt, organic matter, paint products, solvents, acids, vinegar, beverages, oils, pine oils, dirty rags or other foreign matter.

Do not expose to hot surfaces, sparks or open flame.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product directly 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.

FIRST AID

If in Eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes, then continue rinsing eye.
- 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.

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 also contact the Poison Center at 1-800-222-1222 for emergency medical treatment information.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

ACTIVE INGREDIENT:

Sodium Chlorite 25.0 %
OTHER INGREDIENTS: 75.0 %
TOTAL: 100.0 %

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Intended for use only in manufacturing, formulating, mixing, or repacking of products used to generate chlorine dioxide for use as a sterilizing, sanitizing and disinfecting agent, microorganism control and as a chemical oxidant. Sterling Pulp Chemicals can provide information on product composition, toxicity, methods of use, restrictions, limitations and effectiveness. Each manufacturer, formulator, mixer or repacker is responsible for obtaining EPA registration for their specific product(s).

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL

Storage: Avoid exposure to high temperatures during storage. Store remote from other chemicals and combustible materials. Do not skid or slide drums.

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: Triple rinse (or equivalent) all containers and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved of by state and local authorities.

EPA Reg. No.: 53345-10
EPA Est. No.: 53345-CN-004
53345-JTA-001

ACCEPTED
with COMMENTS
EPA Letter Dated: _____
NET CONTENTS _____

AUG - 5 2003

STERLING PULP CHEMICALS, LTD., TORONTO, ONTARIO, CANADA