UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

53345-13

9/4/2003

Dage 184

September 4, 2003

Cristina Griffin Agent for Sterling Pulp Chemicals LTD. c/o Delta Analytical Corp. 7910 Woodmont Ave. Suite 1000 Bethesda, MD 20814

Subject: ERCOPURE EPA Registration No. 53345-13 Application Date: June 4, 2003 Receipt Date: June 13, 2003, 2003

Dear Ms. Griffin :

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with the conditions listed below :

Proposed Amendment

- Amend First Aid Statements in accordance with PR Notice 2001-1
- Amena First Aid Statement in Ingredient Statement
 Change "Inert" to "Other" in Ingredient Statement
- Update Environmental Hazards Statement

Conditions

1. Add the following to the First Aid Statement: "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 advice."

2. Revise the Precautionary Statements to read, "DANGER: Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed, inhaled, or absorbed through skin. Do not get in eyes, on skin, or on clothing. Do not breathe dust. Wear protective clothing, goggles or face shield, and use only Neoprene gloves when handling. Wash thoroughly with soap and water after handling and

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before eating, drinking, or using tobacco. Remove contaminated clothing immediately and wash before reuse."

3. Revise "Mix dilute with water only." to read "Only mix or dilute with water or non-oxidizable materials."

4. Move the text, "Contact with acids may release toxic gas. Use only clean, dry utensils when handling." from Hazards To Human and Domestic Animals to Physical or Chemical Hazards.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one (1) copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions concerning this letter, please contact me at (703) 308-6264.

Sincerely

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

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ERCOPURE

Sodium Chlorite

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 ACTIVE INGREDIENT:
 80.0 %

 OTHER INGREDIENTS
 20.0 %

 TOTAL
 100.0 %

FOR USE IN GENERATING CHLORINE DIOXIDE TO CONTROL MICROORGANISMS IN WATER AND WASTE WATER

KEEP OUT OF REACH OF CHILDREN **DANGER**

SEE PRECAUTIONARY STATEMENTS AND FIRST AID INFORMATION

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS & DOMESTIC ANIMALS

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, irritating to nose and throat. Do not breathe dust, vapors or spray mist. Combustible material contaminated with ERCOPURE 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.

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 ,ontaining 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.

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 ERCOPURE 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.

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ACCEPTED with COMMENTS EPA Letter Dated:

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 53345-13

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.



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

APPLICATIONS:

ERCOPURE is used to generate chlorine dioxide for use as a sterilizing, sanitizing, disinfecting agent and microorganisms control in water and waste water. Examples of applicatins of chlorine dioxide generated from ERCOPURE include:

- potable water disinfection
- waste water & sewerage disinfection
- · algae and bacterial slime control in industrial cooling systems
- microorganisms control on hard surfaces

bacterial slime control in pulp and paper white water systems.

DOSAGE RATE, FREQUENCY AND CONCENTRATION

The required dosage rate, frequency and concentration of chlorine dioxide may vary for each individual user, depending on severity of contamination, temperature and pH. Typical concentrations of chlorine dioxide are between 0.5 and 5 ppm on a continuous basis or between 5 ppm and 100 ppm on an intermittent shock dose basis. Your Sterling Pulp Chemicals, Ltd. representative can guide you in specific applications.

METHOD OF APPLICATION

Chlorine dioxide generation must take place only under controlled conditions in a chlorine dioxide generator. These generators react Aqueous ERCOPURE solutions with either chlorine or a chlorine solution and hydrochloric acid producing an aqueous solution of chlorine dioxide. This solution is then added at a point in the system to be treated which ensures uniform mixing. ERCOPURE is prepared for use in a chlorine dioxide generator by dissolving it in room temperature water. Such solutions are typically 15% or 25% by weight sodium chlorite. A 15% solution requires 192.6 pounds of ERCOPURE per 100 US gallons of water. A 25% solution requires 379.3 pounds of ERCOPURE per 100 US gallons of water. Do not apply ERCOPURE directly to the system being treated. Your Sterling Pulp Chemicals, Ltd. representative can guide you in the method of application. Follow all instructions in the chlorine dioxide generator manual carefully.

STORAGE AND DISPOSAL

JO 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.

Sterling Pulp Chemicals Ltd., Toronto, Ontario, Canada

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