

53345-14

06/26/2007

1/7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

June 26, 2007

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Ana Rodriguez-Koster  
Agent for Erco Worldwide  
c/o Lewis & Harrison  
122 C St., NW Suite 740  
Washington, DC 20001

Subject: ERCOPURE 25  
EPA Registration No. 53345-14  
Application Date: June 18, 2007  
Receipt Date: June 19, 2007

Dear Ms. Rodriguez-Koster:

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

**Proposed Notification**

addition of establishment numbers

**General Comments**

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

The notification application 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 Y. Henson  
Product Reviewer (32)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL	7510P	7510P					
JRNAME	E. Berg	Henson					
DATE	6.26.07	6-26-07					

217

# LEWIS & HARRISON

122 C Street, N.W., Suite 740  
Washington, D.C. 20001  
telephone 202.393.3903  
fax 202.393.3906

Consultants in Government Affairs

June 18, 2007

**VIA FEDERAL EXPRESS**

Document Processing Desk [NOTIF]  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

**ATTENTION: Emily Mitchell  
Product Manager (32)**

**SUBJECT: ERCO Worldwide  
ERCOPURE 25 (EPA Reg. No. 53345-14)  
Notification per PR Notice 98-10 to Add Various Package Sizes**

Dear Ms. Mitchell:

As agent for ERCO Worldwide, I am submitting a Notification pursuant to PR Notice 98-10 for their product, **ERCOPURE 25 (EPA Reg. No. 53345-14)** to add various package sizes to this product's registration.

ERCO is also taking this opportunity to incorporate two (2) alternate Establishment Numbers into the product's label. Please note that, in compliance with the Label Review Manual, the final printed label will have the appropriate establishment number either circled or marked with an "x".

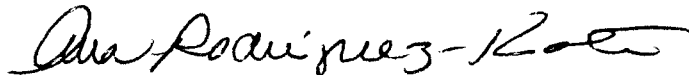
Please note that neither of these revisions changes how the product is used. Furthermore, the revisions do not substitute for or conflict with label text, and are not false or misleading.

Enclosed please find the following documents in support of this Notification:

1. Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
2. One (1) copy of the proposed label with changes highlighted; and,
3. One (1) clean copy of the label.

Thank you for your assistance with this Notification. If you have any questions please call me at 202-393-3903 ext. 17 or e-mail me at [alkoster@lewisharrison.com](mailto:alkoster@lewisharrison.com).


Sincerely,



Ana Rodriguez-Koster  
Agent for,  
ERCO Worldwide

cc: Laurie Kelly, ERCO Worldwide

3/7

 <b>EPA</b> United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input checked="" type="checkbox"/> <b>Other: NOTIFICATION</b>	OPP Identifier Number <h2 style="margin:0;">265394</h2>
---	---	--

**Application for Pesticide - Section I**

1. Company/Product Number <b>53345-14</b>	2. EPA Product Manager <b>Emily Mitchell</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>ERCOPURE 25</b>	PM# <b>Team 32</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>ERCO Worldwide</b> <b>302 The East Mall, Suite 200</b> <b>Toronto, Ontario M9B 6C7 CANADA</b> <b><u>PLEASE SEND ALL CORRESPONDENCE TO</u></b> <b><u>"CONTACT POINT" LISTED BELOW</u></b> <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.)

**NOTIFICATION TO ADD VARIOUS PACKAGE SIZES**

**Notification to ADD VARIOUS PACKAGE SIZES in Accordance With PR Notice 98-10**

*This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.*

Signature: Ana Rodriguez-Koster Date: 6/18/2007

**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 <input checked="" type="checkbox"/> Plastic <input checked="" type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify)
*Certification must be submitted		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt.    No. per container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container - 55 U.S. gals (210 liters) drums; - 250 or 330 U.S. gals (946.4 liters) totes; or, - Bulk (truck or railcar).		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled					

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name <b>Ana Rodriguez-Koster, Lewis &amp; Harrison, LLC</b> <b>122 C St. NW, #740, Washington DC 20001</b>	Title <b>Agent for ERCO Worldwide</b>	Telephone No. (Include Area Code) <b>(202) 393-3903 x.17</b>
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 <b>(Stamped)</b>
2. Signature <u>Ana Rodriguez-Koster</u>		
3. Title <b>Agent for ERCO Worldwide</b>		
4. Typed Name <b>Ana Rodriguez-Koster</b>		5. Date <b>6/18/2007</b>

417



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number  
**265394**

**Application for Pesticide - Section I**

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name)	PM#	
5. Name and Address of Applicant (Include ZIP Code)  <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 type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

**NOTIFICATIONS**

**Section - III**

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.      No. per container	If "Yes" Package wgt      No. per container

3. Location of Net Contents Information  
 Label       Container

4. Size(s) Retail Container

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product  
 Lithograph  
 Paper glued  
 Stenciled       Other \_\_\_\_\_

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

Name	Title	Telephone No. (Include Area Code)
------	-------	-----------------------------------

**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.

2. Signature	3. Title	6. Date Application Received (Stamped)
4. Typed Name	5. Date	

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**DANGER.** Corrosive. Causes eye and skin damage. Do not get in eyes, on skin or 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 breath dust, vapors or spray mist. Remove and wash contaminated clothing immediately.

**Environmental Hazards**

This product is toxic to fish and aquatic organisms. 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.

**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 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.

**ERCOPURE 25**

Sodium Chlorite Solution

For Use in Generating Chlorine Dioxide to Control Microorganisms in Potable Water, Wastewater, Food Processing Plant Water, Once-Through Cooling Systems, General Industrial Process Water and Food-Contact Surfaces

Active Ingredient

Sodium Chlorite..... 25.0%

Other Ingredients.....75.0%

TOTAL: 100.0%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

See Side Panels for Additional Precautionary Statements

<b>FIRST AID</b>	
<b>If in Eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first five minutes, then continue rinsing eye.</li> <li>• Call a <u>poison control center</u> or doctor for treatment advice.</li> </ul>
<b>If on Skin or Clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a <u>poison control center</u> or doctor for treatment advice.</li> </ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a <u>poison control center</u> or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a <u>poison control center</u> or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If Inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a <u>poison control center</u> or doctor for further treatment advice.</li> </ul>
Have the product container or label with you when calling a <u>poison control center</u> or doctor, or going for treatment.	
<b>Note to Physician:</b> Probable mucosal damage may contraindicate the use of gastric lavage.	

**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 directions, 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.

ERCO Worldwide  
302 The East Mall, Suite 200  
Toronto, Ontario M9B 6C7  
CANADA

EPA Reg. No. 53345-14  
EPA Est. No. \_\_\_\_\_ 53345-CN-01  
\_\_\_\_\_ 53345-CAN-004  
\_\_\_\_\_ 070124-LA-001

**Net Contents:**

55 U.S. gals (210 liters) or 250 U.S. gals (946.4 liters),  
or 330 U.S. gals (1249 liters), or bulk (truck or railcar)

517

## DIRECTIONS FOR USE

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

### CHLORINE DIOXIDE GENERATION

ERCOPURE 25 is a precursor for the generation of chlorine dioxide. DO NOT ADD ERCOPURE 25 directly to the system being treated. Chlorine dioxide solutions can be generated from ERCOPURE 25 by several common methods including:

1. The chlorine method which utilizes a ERCOPURE 25 and chlorine gas, or
2. The hypochlorite method which utilizes ERCOPURE 25, a hypochlorite solution and an acid or,
3. The Acid-Chlorite method which utilizes ERCOPURE 25 and an acid, or
4. The electrolytic method which utilizes ERCOPURE 25, with sodium chloride as needed

Add the generated chlorine dioxide solution to a point in the system which ensures uniform mixing. Your ERCO Worldwide representative can guide you in the selection, installation and operation for feed systems.

### APPLICATIONS

**POTABLE WATER AND WASTEWATER DISINFECTION:** For most municipal systems, a chlorine dioxide residual concentration up to 2.0 ppm is sufficient to provide adequate disinfection. The concentration of total residue oxidants (chlorine dioxide, chlorite and chlorate) should be monitored such that it does not exceed 1.0 ppm in the distribution system. For wastewater and sewage applications, residual chlorine dioxide concentrations up to 5.0 ppm are generally adequate.

**FOOD PROCESSING PLANTS, DAIRIES, BOTTLING PLANTS AND BREWERIES AND FOOD PLANT PROCESS WATER:** For microbial control in typical food processing water systems, such as flume transport, chill water systems, hydrocoolers and retort cooling water, apply ERCOPURE 25 through a chlorine dioxide generation system to achieve a chlorine dioxide residual concentration ranging from 0.25 to 5.0 ppm.

Chlorine dioxide generated from ERCOPURE 25 may also be used as a water sanitizer for fruit and vegetable washing and cut and peeled potatoes products without a subsequent potable water rinse requirement, provided that the concentration of total residual oxidants meet the residual limitations of  $\leq 1.0$  ppm.

Residual concentrations up to 5.0 ppm chlorine dioxide in process water may be used for washing whole uncut and unpeeled fruits and vegetables although a final potable water rinse is required if the residual exceeds 1 ppm.

Potatoes, including those which have been peeled or cut, may be treated with sufficient chlorine dioxide to produce a residual concentration of up to 5.0 ppm provided this is followed by a potable water rinse.

**POULTRY PROCESSING WATER:** Use ERCOPURE 25 to generate chlorine dioxide for use as an antimicrobial agent in water used in poultry processing in an amount not to exceed 3 ppm residual chlorine dioxide as determined by an appropriate method.

**SANITIZATION OF FOOD-CONTACT SURFACES IN FOOD-PROCESSING PLANTS, DAIRIES, BOTTLING PLANTS AND BREWERIES:**

**Note: Only the chlorine and hypochlorite methods described above can be used to generate chlorine dioxide for sanitization of food-contact surfaces.**

Use ERCOPURE 25 to generate chlorine dioxide for use as a terminal no-rinse sanitizer for food-contact surfaces, food-processing equipment and utensils. Prior to application, remove gross food particles and soil by a pre-flush, or pre-scrape, and when necessary, pre-soak treatment. Then thoroughly wash all equipment, surfaces and utensils with a suitable detergent or cleaner, followed by a potable water rinse. Dilute the chlorine dioxide solution generated from the chlorine dioxide generator with potable water to achieve a use-solution of at least 100 ppm but not more than 200 ppm available chlorine dioxide. A contact time of at least one minute is required for sanitization. Allow the sanitizing solution to thoroughly drain and dry from all equipment and surfaces prior to recontact of the sanitized surface with food or feed items.

**GENERAL INDUSTRIAL PROCESS WATER TREATMENT (OILFIELD INJECTION WATER, WHITE WATER PAPER MILL SYSTEMS, AND RECIRCULATING COOLING TOWERS):** Use ERCOPURE 25 to generate chlorine dioxide for the control of microbial slime in the above water systems. In order to achieve adequate control, the chlorine dioxide residual concentration should be between 0.25 and 5.0 ppm.

**ONCE-THROUGH COOLING WATER SYSTEMS:** Control of mollusks can be effectively accomplished using ERCOPURE 25 as directed in commercial and industrial once-through cooling water systems. ERCOPURE 25 may be fed on a continuous or slug basis depending on the degree of system fouling.

**SLUG DOSE:** Add 42 to 210 lbs. of chlorine dioxide per million gallons of water (5 to 25 ppm).

**CONTINUOUS DOSE:** Add 2 to 16 lbs. of chlorine dioxide per million gallons of water (0.25 to 2 ppm)