

September 9, 2003

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

Subject: Ercocide CP
 EPA Registration No. 53345-17
 Application Date: June 4, 2003
 Receipt Date: June 16, 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 following comments :

Proposed Amendment

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

Conditions

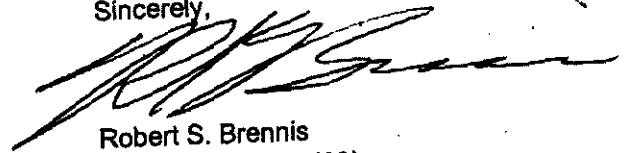
1. Revise the Precautionary Statements to read, "Harmful if swallowed. Avoid breathing dust. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse."

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)

CONCURRENCES

SYMBOL	7510 C	7510C					
URNAME	E. Berg	Mitchel					
DATE	9-9-03	9/9/03					

ERCOCIDE CP

Sodium Chlorate

ACTIVE INGREDIENT:	
Sodium Chlorate	99.5%
OTHER INGREDIENTS:	0.5%
TOTAL	100.0%

FOR USE IN GENERATING CHLORINE DIOXIDE TO CONTROL BACTERIAL SLIME IN PULP AND PAPER WHITE WATER SYSTEMS

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed or inhaled. Avoid breathing dust. Avoid contact with skin, eyes or clothing. In case of contact, immediately flush eyes or skin with plenty of water.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans or public 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. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Strong oxidizing agent, avoid contaminating with combustible materials such as clothing, wood, or leather as a serious fire hazard will result. Contact with strong acids may cause evolution of poisonous and possible explosive mixtures of chlorine dioxide and chlorine gases. Decomposes above 500°F.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Ercocide CP is used to generate chlorine dioxide to control bacterial slime in pulp and paper water systems.

DOSAGE RATE, FREQUENCY AND CONCENTRATION

The required dosage rate, frequency and concentration of Chlorine Dioxide may vary for each individual user. Typical concentrations of Chlorine Dioxide are between 1000-2000 ppm on a continuous basis, or between 1000-4000 ppm on an intermittent shock dose basis. Your Sterling Pulp Chemicals representative can guide you in the method of application.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
<i>If swallowed:</i>	<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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.
<i>If in Eyes:</i>	<ul style="list-style-type: none"> 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.
<i>If on Skin or Clothing:</i>	<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.
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.	

METHOD OF APPLICATION

Chlorine Dioxide generation must take place only under controlled conditions in a Chlorine Dioxide Generator. Dissolve Ercocide CP in water, then within the Chlorine Dioxide Generator, react with Sulfuric Acid and Methanol or 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. Do not apply Ercocide CP directly to the system being treated. Your Sterling Pulp Chemicals representative can guide you in the method of application. Follow all instructions in the Chlorine Dioxide Generator Manual carefully.

STORAGE & 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: Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

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. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Sterling Pulp Chemicals Ltd.
Toronto, Ontario, Canada

NET CONTENTS _____

ACCEPTED

with COMMENTS

EPA Letter Dated:

EPA Reg. No. 53345-17

EPA Est. No. 53345-CN-001

53345-CN-002

53345-CN-003

53345-ITA-001

SEP 9 2003

MADE IN _____

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 53345-17