

53345-19

11/26/2003

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November 26, 2003

Ana Rodriguez-Koster  
Lewis & Harrison LLC  
122 C Street, NW  
Suite 740  
Washington, DC 20001

Subject: ERCO Worldwide  
Sodium Chlorite Solution 7.5  
EPA Registration No. 53345-19  
Application Date: November 18, 2003  
Receipt Date: November 19, 2003

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**

- Correction of Typographical Error

**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 Mitchell  
Product Reviewer - Team 32  
Regulatory Management Branch II  
Antimicrobials Division (7510C)

**CONCURRENCES**

SYMBOL	7510C						
SURNAME	Mitchell						
DATE	11-26-03						

### Application for Pesticide - Section I

1. Company/Product Number 53345-19	2. EPA Product Manager Robert Brennis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SODIUM CHLORITE SOLUTION 7.5	PM# Team 32	
5. Name and Address of Applicant (Include ZIP Code) ERCO Worldwide 302 The East Mall, Suite 200 Toronto, Ontario M9B 6C7 <b>PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</b> <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 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.)

REVISION OF TYPOGRAPHICAL ERROR ON PAGE 2 OF THE PRODUCT LABEL

#### Notification of REVISION OF TYPOGRAPHICAL ERROR 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: 11/18/03

### Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic lined rail cars and trucks
Certification must be submitted If "Yes" Unit Packaging wgt.      No. per container		If "Yes" Package wgt.      No. per container		<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product				<input type="checkbox"/> Other _____	
				<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input 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 Ana Rodriguez-Koster, Lewis & Harrison, LLC, 122 C Street NW, Ste. 740, Washington, DC 20001	Title Agent for ERCO Worldwide	Telephone No. (Include Area Code) 202-393-3903 x.17
<b>Certification</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 (Stamped)
2. Signature <i>Ana Rodriguez Koster</i>	3. Title Agent for ERCO Worldwide	
4. Typed Name Ana Rodriguez-Koster	5. Date 11/18/03	

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# LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740  
Washington, D.C. 20001

telephone 202.393.3903  
fax 202.393.3906

November 18, 2003

**HAND DELIVERED**

Document Processing Desk [NOTIF]  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

**ATTENTION: Robert Brennis**  
**Product Manager, Team 32**

**SUBJECT: ERCO Worldwide**  
**SODIUM CHLORITE SOLUTION 7.5 (EPA Reg. No. 53345-19)**  
**Notification per PR Notice 98-10**

Dear Mr. Brennis:

As agent for ERCO Worldwide, we are submitting a Notification pursuant to PR Notice 98-10 for their product, **SODIUM CHLORITE SOLUTION 7.5 (EPA Reg. No. 53345-19)**. This Notification involves the revision of a typographical error present in the use directions section of the label (please refer to the enclosed highlighted label for highlighted changes).

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 label with changes highlighted; and,
3. Two (2) clean copies of the product label.

Thank you for your assistance with this submission. If you have any questions or need further assistance, please contact me by telephone at 202-393-3903 ext. 17 or by e-mail at [alkoster@lewisharrison.com](mailto:alkoster@lewisharrison.com).

Sincerely,

Ana Rodriguez-Koster  
Agent for,  
ERCO Worldwide

Enclosures

cc: John Christie (ERCO Worldwide)

**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. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and was 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.

**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 chlorite and chlorine dioxide gas mixture which is toxic and may be explosive. Combustible materials contaminated with Sodium Chlorite Solution 7.5 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.

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

**SODIUM CHLORITE SOLUTION 7.5**

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

**Active Ingredient**

Sodium Chlorite..... 7.5%

**Inert Ingredients**.....92.5%

100.0%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

See Side Panels for Additional Precautionary Statements

FIRST AID	
<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 poison control center 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 poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center 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 poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>Note to Physician:</b> Probable mucosal damage may contraindicate the use of gastric lavage.	
Have the product or label with you when calling a poison control center or doctor, or going for treatment.	

EPA Reg. No. 53345-19  
EPA Est. No. 53345-CN-01

Net contents: 55 U.S. gals (210 liters)

**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.

**NOTIFICATION**  
Date Reviewed: 11/20/03  
Reviewed By: W. Mitchell

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### DIRECTIONS FOR USE

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

### CHLORINE DIOXIDE GENERATION

SODIUM CHLORITE SOLUTION 7.5 is a precursor for the generation of chlorine dioxide. DO NOT ADD SODIUM CHLORITE SOLUTION 7.5 directly to the system being treated. Chlorine dioxide solutions can be generated from SODIUM CHLORITE SOLUTION 7.5 by several common methods including:

1. The chlorine method which utilizes a SODIUM CHLORITE SOLUTION 7.5 and chlorine gas, or
2. The hypochlorite method which utilizes SODIUM CHLORITE SOLUTION 7.5, a hypochlorite solution and an acid or,
3. The Acid-Chlorite method which utilizes SODIUM CHLORITE SOLUTION 7.5 and an acid, or
4. The electrolytic method which utilizes SODIUM CHLORITE SOLUTION 7.5, 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 and other potable water systems, a chlorine dioxide residual concentration up to 2.0 ppm is sufficient to provide adequate disinfection. The concentration of total residual 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**  
**FOOD PLANT PROCESS WATER:** For microbial control in food processing water systems (flume transport, chill water systems, hydrocoolers and retort cooling water) apply SODIUM CHLORITE SOLUTION 7.5 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 SODIUM CHLORITE SOLUTION 7.5 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 SODIUM CHLORITE SOLUTION 7.5 to generate chlorine dioxide for use as an antimicrobial agent in water used in poultry processing in an amount not to exceed 2 ppm residual chlorine dioxide as determined by an appropriate method.

**SANITIZATION OF FOOD-CONTACT SURFACES IN FOOD-PROCESSING PLANTS, DAIRIES, BOTTLING PLANTS AND BREWERIES:** Use SODIUM CHLORITE SOLUTION 7.5 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 cleared for use on food contact surfaces under the Federal, Food, Drug and Cosmetic Act 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):** For control of microbial slime, these systems will require a chlorine dioxide residual concentration ranging between 0.25 and 5.0 ppm.

**ONCE-THROUGH COOLING WATER SYSTEMS:** Control of mollusks can be effectively accomplished using SODIUM CHLORITE SOLUTION 7.5 as directed in commercial and industrial once-through cooling water systems. SODIUM CHLORITE SOLUTION 7.5 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)