

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: Sodium Chlorite Solution
 EPA Registration No. 53345-21
 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
- Change "Inert" to "Other" in Ingredient 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 "Mix dilute with water only." to read "Only mix or dilute with water or non-oxidizable materials."
3. Revise the beginning of the Precautionary Statements to read, "DANGER: Highly Corrosive. Causes irreversible eye damage and skin burns." Revise the sentence "Wear goggles or face shield..." to read "Wear protective clothing, goggles or face shield..."
4. Add the following statement to the Directions for Use sections for "General Industrial Process Water Treatment" and "Once-through Cooling water Systems": "Badly fouled systems must be cleaned before treatment."

CONCURRENCES

SYMBOL	7510 C	7510C					
SURNAME	E. Berg	Mitchell					
DATE	9-9-03	9-9-03					

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								
SURNAME								
DATE								

ERCOPURE 37

Sodium Chlorite Solution

ACTIVE INGREDIENT:	
Sodium Chlorite	37.0 %
OTHER INGREDIENTS	63.0 %
TOTAL	100.0 %

FOR USE IN GENERATING CHLORINE DIOXIDE TO CONTROL MICROORGANISMS
 IN POTABLE WATER, WASTE WATER, FOOD PROCESSING PLANT WATER,
 ONCE-THROUGH COOLING SYSTEM AND GENERAL INDUSTRIAL PROCESS WATER

KEEP OUT OF REACH OF CHILDREN
DANGER

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 vapors or spray mist. Remove and wash contaminated clothing immediately.

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 chlorine and chlorine dioxide gas mixture which is toxic and may be explosive. Combustible materials contaminated with ERCOPURE 37 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.

ACCEPTED
with COMMENTS
 EPA Letter Dated:

SEP 9 2003

NET CONTENTS _____

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No. 53345-21

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.

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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.

METHOD OF APPLICATION

Chlorine dioxide generation must take place only under controlled conditions in a chlorine dioxide generator. These generators react ERCOPURE 37 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. Alternatively, a weak acid generation of chlorine dioxide can be used. This method involves contacting sodium chlorite in an aqueous solution with citric acid. Do not apply ERCOPURE 37 directly to the system being treated. Follow all instructions in the chlorine dioxide generator manual carefully.

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 typical food processing water systems, such as flume transport, chill water systems, hydrocoolers and retort cooling water, apply ERCOPURE 37 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 37 may also be used as a water sanitizer for fruit and vegetable washing and cut and peeled potato products without a subsequent potable water rinse requirement, provided that the concentration of total residual oxidants meet the residual limitations of ≤ 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 37 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.

AQUEOUS DISINFECTION SYSTEMS FOR CIP CLEANING: Use a chlorine dioxide concentration of 0.25-5 ppm. If the concentration of chlorine dioxide generated from ERCOPURE 37 exceeds 5.0 ppm, a potable water rinse should follow treatment. Care should be taken to ensure the biological and chemical quality of the potable water.

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 molluscs can be effectively accomplished using ERCOPURE 37 as directed in commercial and industrial once-through cooling water systems. ERCOPURE 37 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).

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.

Made in _____

Sterling Pulp Chemicals Ltd., Toronto, Ontario, Canada

EPA Reg. No. 53345-21

53345-CN-004
53345-ITA-001