

53345-23

07/08/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JUL - 8 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Georgia Anastasiou
Lewis & Harrison
122 C Street, NW
Suite 740
Washington, DC 20001

FILE COPY

Subject: ERCO Worldwide
ERCOPURE 31
EPA Registration No. 53345-23
Application Dated: June 11, 2010
Receipt Dated: June 11, 2010

Dear Ms. Anastasiou:

The following notification submitted in connection with registration under the provisions of PR Notice 98-10, Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)9 is acceptable.

Proposed Notification:

- Update the Storage and Disposal language per PR Notice 2007-4

Comments:

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

This application for notification to revise the storage and disposal language, as referenced above, is acceptable. A copy has been placed in our records for future reference.

Should you have any questions or comments concerning this letter, please contact me at Henson.Wanda@epa.gov or call (703) 308-6345.

Sincerely,

Wanda Henson
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Please read instructions on reverse before completing form.

Form Approved OMB No. 2070-0060, Approval expires 05-31-98

 EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other:	OPP Identifier Number
	Application for Pesticide - Section I	

1. Company/Product Number 50956-23 ^{bp} 53345-23	2. EPA Product Manager Wanda Henson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ERCOPURE 31	PM# Team 32	
5. Name and Address of Applicant (Include ZIP Code) ERCO Worldwide 302 The East Mall, Suite 200 Toronto, Ontario M9B 6C7 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <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.)

Notification to Revise Storage and Disposal Language

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156, 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.

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 type="checkbox"/> Metal	<input checked="" 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 checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container Non-refillable containers - equal to or less than 5 gallons and over 5 gallons. Tank Trucks & Rail Cars		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 type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input checked="" type="checkbox"/> Other Provided with tank trucks & rails cars	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Georgia Anastasiou, 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.19
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.		6. Date Application Received (Stamped)
2. Signature <i>Georgia Anastasiou</i>	3. Title Agent for ERCO Worldwide	
4. Typed Name Georgia Anastasiou	5. Date June 11, 2010	

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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

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June 11, 2010

HAND DELIVERED

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

**ATTENTION: Wanda Henson
Product Manager (32)**

**SUBJECT: ERCO Worldwide
Application for Notification per PR Notice 2007-4
Sodium Chlorite Solution 25 (EPA Reg. No. 53345-10)
Sodium Chlorite Solution 37 (EPA Reg. No. 53345-12)
ERCOPURE 25 (EPA Reg. No. 53345-14)
ERCOPURE 37 (EPA Reg. No. 53345-21)
Sodium Chlorite Solution 31 (EPA Reg. No. 53345-22)
ERCOPURE 31 (EPA Reg. No. 53345-23)**

Dear Ms Henson:

On behalf of ERCO Worldwide, I am submitting a notification for the above listed products. The purpose of this notification is to revise the disposal section in accordance with PR Notice 2007-4 with the exception of the tank truck and rail car language which is exempt from the new disposal language requirements (40 CFR § 156.144(g)) and to revise the storage language. Please note the proposed storage language does not conflict with the recommended language listed in the Label Review manual. The only difference is the proposed language provides more details to ensure safe storage of the material.

In support of this submission I have enclosed the following documents:

- 1) Application for Pesticide Notification for each product
- 2) One (1) copy of the label with changes highlighted for each product.
- 3) Two (2) copies of the revised label for each product.

If you have any questions, or require any additional information, please feel free to contact me by phone at 202-393-3903 ext. 19, by fax at 202-393-3906, or by email at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for,
ERCO Worldwide

cc: Laurie Kelly (ERCO)

Precautionary Statements

Hazard to Humans and Domestic Animals

DANGER: Highly corrosive, causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or clothing. Wear goggles or face shield, use only Neoprene gloves and use only thoroughly clean dry utensils when handling. May be Fatal if swallowed. *Irritating to Nose and Throat. Avoid breathing fumes.* Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

Environmental Hazards

This product is toxic to fish and other 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 31 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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product 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 31 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, chlorine dioxide can be generated electrically by anodic reduction.

Do not apply ERCOPURE 31 directly to the system being treated. Follow all instructions in the chlorine dioxide generator manual.

APPLICATIONS

MUNICIPAL DRINKING WATER DISINFECTION

For municipal water systems, a chlorine dioxide residual concentration up to 2.0 ppm is sufficient to provide adequate disinfection. Normal target residual concentrations are in the 0.20-0.75 ppm range. Monitor the distribution system to ensure that the chlorite concentration does not exceed its maximum contaminant level (MCL) of 1 mg/L and that chlorine dioxide does not exceed its maximum residual disinfectant level (MRDL) of 0.8 mg/L.

ERCOPURE 31

Sodium Chlorite Solution

For Use in Generating Chlorine Dioxide to Control Microorganisms in Municipal Drinking Water

Active Ingredient

Sodium Chlorite..... 31.0%

Inert Ingredients..... 69.0%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See Side Panel for Additional Precautionary Statements

FIRST AID

IF IN EYES: Hold eye open rinse slowly and gently with plenty of water for at least 15 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing and shoes. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

EPA Reg. No. 53345-23
EPA Est. No. 53345-CN-001
53345-CAN-004
70124-LA-001

Net Contents:

ERCO Worldwide
302 The East Mall, Suite 200
Toronto, ON CANADA M9B6C7

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE:

Store upright in cool, dry and well-ventilated place. Avoid excessive heat or freezing. Protect from contact with other chemicals; avoid storage with organic chemicals, acids, reducers and combustible material. Keep container tightly closed when not in use. In case of spills, flush and drain promptly to sewer with large quantities of water. Do not allow liquid to dry out because this could present a fire hazard. If fire occurs, extinguish with large volume of water. 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 HANDLING

Tank trucks and Railcars: Return for reuse. All valves must be closed tight and closures or caps secured.

Containers equal to or less than 5 gallons: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Containers over 5 gallons: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for several times. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

NOTIFICATION
Date Reviewed: 7/19/2010
Reviewed By: J. Wilson

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