

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

JUL 22 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Kim Davis Consultant/Agent for ConSeal International, Inc. RegWest Company, LLC 8203 West 20<sup>th</sup> Street Suite A Greeley, CO 80634

Subject:

Sanicide-20

EPA Reg. No. 58300-18

Application Dated: June 24, 2011 Receipt Date: June 27, 2011

Dear Ms. Davis:

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:**

 Label revisions to update storage and disposal instructions, addition of container sizes, and addition of marketing claims section

#### **Comments:**

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

This application for notification to revise the product label, 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 Wanda Henson on 703:308-6345 or via email at <a href="mailto:Henson.Wanda@epa.gov">Henson.Wanda@epa.gov</a>.

Sincerely,

1onisha Harris

Product Manager (32)

Regulatory Management Branch II Antimicrobials Division (7510P)

Please read instructions on reverse before Form Approved. OMB No. 2070-0060 **OPP Identifier Number United States** Registration **Environmental Protection Agency Amendment Notification** 1200 Pennsylvania Avenue, N.W. Other Washington, DC 20460-0001 Application for Pesticide - Section I 1. Company/Product Number 2. EPA Product Manager 3. Proposed Classification EPA Reg. No. 58300-18 Velma Noble 4. Company/ Product (Name) ☐ Restricted SaniCide® -20 5. Name and Address of Applicant (Include ZIP Code) 6. Expedited Review. In accordance with FIFRA Section ConSeal International, Inc. 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: c/o RegWest Company, LLC 8203 West 20th St., Suite A EPA Reg. No. 5382-43 Greelev. CO 80634-4696 Product Name Technical Sodium Chlorite 3L25 ☐ Check if this is a new address Section - II Final printed labels in response to Agency letter dated Amendment – Explain below. "Me Too" Application. Resubmission in response to Agency letter dated ■ Notification – Explain below. Other - Explain below. Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Submit Label Revision Notification per PR Notices 98-10 and 2007-4. Notification of label change per PR Notices 98-10 and 2007-4. This notification is consistent with the guidance of PR Notices 98-10 and 2007-4 and the requirements of EPA's regulations at 40 CFR § § 152.46, 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 statement to the EPA. I further understand that if this notification is not consistent with the 40 CFR § § 152.46, 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: Child Resistant Packaging | Unit Packaging Water Soluble Packaging 2. Type of Container ☐ Yes ☐ Yes\* ☐ Yes Metal ■ No ■ No No. Plastic If "Yes" If "Yes" No. Per No. Per \*Certification must be Glass Unit Packaging Wt. Packaging Wt. Container Container submitted □ Paper ☐ Other (Specify): 3. Location of Net Contents Information 4. Size(s) Retail Container 5. Location of Label Directions On Label 1, 5 and 55 gallons ☐ Label Container On Labeling Accompanying Product ☐ Stenciled Lithograph 6. Manner in Which Label is Affixed to Product Paper glued Other Section - IV 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application). Telephone No. Elincifide Area Code) Name Title 970.353.0611 Consultant/Agent Kim Davis - ltim@regwest.com 6. Date Application Certification Received I certify that the statements I have made on this form and all attachments thereto are true, (Stamped) 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 Consultant/Agent 5. Date 4. Typed Name June 24, 2011 Kim Davis

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

#### **Label Revision Notification**



June 24, 2011

Ms. Velma Noble, Product Manager 32
Document Processing Desk - *NOTIF*Office of Pesticide Programs – *7504P*U.S. Environmental Protection Agency
One Potomac Yard (South Building), Room S-4900
2777 South Crystal Drive
Arlington, VA 22202

Dear Ms. Noble:

Subject: ConSeal International, Inc.

SaniCide® -20

EPA Reg. No. 58300-18

On behalf of *ConSeal International, Inc.*, RegWest Company, LLC is submitting the attached documents per PR Notices 98-10 and 2007-4. RegWest Company will act as sole agent in this endeavor.

Attached are the following documents:

- 1. Application for Pesticide: Notification
- 2. One **Reference Label** (illustrating the label revisions)
- 3. Two **New Labels** (incorporating the revisions)

In addition to the 2007-4 PR Notice changes, we are updating container sizes. Please refer to the **Reference Label** for an illustration of all revisions.

Please contact me or Dean Moser at 970.353.0611 or dean@regwest.com if you have any questions or comments concerning this submission.

Regards,

RegWest Company, LLC

Kim Davis, Consultant/Agent

Attachments

cc: CII - Gilmore, D.

58300-18 New Label: Page 1 of 5 10/13/04 SAL + 01/23/06, 07/30/2010 & 06/24/2011 Notifications

# SaniCide®-20

[{Select marketing claims from "Marketing Claims" section}]

NOTIFICA Data Reviewed: Reviewed By: (//	170N 11/22/2011
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**Active Ingredient:** 

 Sodium Chlorite (CAS No. 7758-19-2).
 25%

 Other Ingredients
 75%

 Total
 100%

# Keep Out of Reach of Children DANGER

See side [back] panel for First Aid and additional Precautionary Statements.

EPA Reg. No. 58300-18

EPA Est. 58300-MA-31

Net Contents: \_\_\_\_\_ gals [fl oz.] {1, 5 or 55 gallons}

(Side Panel [Back Panel])

#### First Aid

If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes.
	Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
	Call a poison control center or doctor for treatment advice.
lf on Skin	Take off contaminated clothing.
or Clothing:	Immediately rinse skin with plenty of water for 15-20 minutes.
	Call a poison control center or doctor for treatment advice.
If Swallowed:	Immediately call a poison control center or doctor 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.
If Inhaled:	Move person to fresh air.
	• If person is not breathing, call 911 or an ambulance, and then give artificial respiration,
	preferably mouth-to-mouth if possible.
	<ul> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
Have the produc	ct container or label with you when calling a poison control center or doctor, or going for
treatment.	
Note to Physic	ian: Probable mucosal damage may contraindicate the use of gastric lavage.

{Note: The first aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

#### PRECAUTIONARY STATEMENTS

#### **Hazards to Humans & Domestic Animals**

**DANGER: Highly Corrosive.** Causes irreversible eye damage and skin burns. Harmful if swallowed. Irritating to nose and throat. Do not get in eyes, on skin or clothing. Wear protective eyewear (goggles or safety glasses), protective clothing and rubber gloves when handling this product. Avoid breathing dust and fumes. Thoroughly wash with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

#### **Physical or Chemical Hazards**

Dry sodium chlorite is a strong oxidizing agent. This product becomes a fire or explosive hazard if allowed to dry. Mix only into water. Contamination may start a chemical reaction with generation of heat, liberation of hazardous gases

58300-18 New Label: Page 2 of 5 10/13/04 SAL + 01/23/06, 07/30/2010 & 06/24/2011 Notifications

(chlorine dioxide – a poisonous, explosive gas) and possible fire and explosion. Do not contaminate with garbage, dirt, organic matter, household products, chemicals, soap products, paint products, solvents, acids, vinegar, beverages, oils, pine oil, dirty rags or any other foreign matter.

#### **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 the 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.

#### **DIRECTIONS FOR USE**

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

# Directions for Controlling the Growth of Algae in Recirculating Cooling Water Towers:

- 1. Clean badly fouled systems before starting treatment.
- 2. When algae are visible, add an initial dosage of 8.4 fluid ounces of SaniCide®-20 per 1,000 gallon8 of water in the system. Repeat if necessary until control is evident.
- 3. Where algae control is evident, use a subsequent dose of 4.2 fluid ounces of **SaniCide®-20** per 1,600 gallons of water in the system twice a week or as needed to maintain control.
- 4. Add SaniCide®-20 directly to the cooling tower drip pan (cold water basin) near the inlet to the recirculating pump.

Directions for Use in the Mechanical or Electrolytic Generation of Chlorine Dioxide (ClO<sub>2</sub>) as a Disinfectant, or for Microorganism or Mollusk Control and as a Chemical Oxidant in Aquatic Systems:

**Feed Requirements:** Feed rates of **SaniCide®-20** will depend on the severity of contamination and the degree of desired control. The exact dosage will depend on the size of the system and residual necessary for effective control. Depending on the generator type, **SaniCide®-20** may be diluted at the point of use to prepare a 3% to 25% active aqueous solution for use in chlorine dioxide generators.

Some examples of industrial applications of chlorine dioxide include:

- Potable water disinfection and removal of sulfide.
- Control of bacterial slime, algae and mollusks in industrial recirculating and one-pass cooling systems.
- Biocontrol in food processing flumes, water-using equipment, cooling water and recycled waters.
- Disinfection of sewage and plant wastes.
- Destruction of phenolics, simple cyanides and sulfides by chemical oxidation.
- Bacterial slime control in white water paper mill systems.
- Bacterial control in oil well and petroleum systems.

See product bulletins (or Technical Data Sheets) for specific application instructions. Your ConSeal International representative can guide you in the application techniques.

**Method of Feed:** Large amounts of chlorine dioxide can be generated by several common methods, including:

- 1. The chlorine method that utilizes a Sodium Chlorite solution and chlorine gas; or
- 2. The hypochlorite method that utilizes a Sodium Chlorite solution, a hypochlorite solution and an acid; or
- 3. The Acid-chlorite method that utilizes a Sodium Chlorite solution and an acid; or
- 4. The electrolytic method that utilizes a Sodium Chlorite solution, with sodium chloride added as needed.

Your ConSeal International representative can guide you in the selection, installation and operation for feed systems. Consult product bulletin and also the instructions on the chlorine dioxide generation system before using **SaniCide®**-

58300-18 New Label: Page 3 of 5 10/13/04 SAL + 01/23/06, 07/30/2010 & 06/24/2011 Notifications

**20**. User is responsible for compliance with applicable Federal, state and local laws/regulations regarding proper use and disposal of the chlorine dioxide generated.

### Directions for Use in Controlling Microbial Population in Poultry Processing Water:

Chlorine dioxide generated from SaniCide®-20 may be used as an antimicrobial agent in poultry-processing water, provided that the residual concentration of chlorine dioxide does not exceed 3 parts per million (ppm), as determined by an appropriate method in accordance with 21 CFR § 173.300. For treatment of poultry chill water, apply SaniCide®-20 as necessary through a chlorine dioxide generation system to maintain a residual concentration of up to 3 ppm chlorine dioxide in the chiller water.

#### **Food Plant Process Water Treatment:**

Chlorine dioxide generated from sodium chlorite is effective for use in controlling microbiological growth in flume water and other food processing water systems such as chill water systems and hydrocoolers. The required desages will vary with process conditions and the degree of contamination present. Depending on the requirements of the specific water system, apply sodium chlorite continuously or intermittently through a chlorine dioxide genefating system to achieve a chlorine dioxide residual concentration between 0.25 and 5 ppm.

Water, containing up to 3 ppm residual chlorine dioxide may be used for washing fruits and vegetables that are not raw agricultural commodities in accordance with 21 CFR § 173.300. Treatment of the fruits and vegetables with chlorine dioxide must be followed by a potable water rinse, or by blanching, cooking or canning.

#### **Industrial Cooling Water Treatment**

For control of bacterial slime and algae in industrial recirculating and one-pass cooling systems, the required dosages will vary depending on the exact application and the degree of contamination present. The required chlorine dioxide residual concentrations range between 0.1 and 5 ppm. Chlorine dioxide may be applied either continuously or intermittently. The typical chlorine dioxide residual concentration range is 0.1 to 1 ppm for continuous doses and 0.1 to 5 ppm for intermittent doses. The minimum acceptable residual concentration of chlorine dioxide is 0.1 ppm for a minimum one-minute contact time.

#### **Potable Water Treatment:**

Chlorine dioxide is used as both an oxidant and a disinfectant in drinking water treatment. The required dosages will vary with source water conditions and the degree of contamination present. For most municipal and public potable water systems, a chlorine dioxide residual concentration of up to 2 ppm is sufficient to provide adequate disinfection. Residual disinfectant and disinfection byproducts must be monitored as required by the National Primary Drinking Water Regulations (40 CFR Part 141) and state drinking water standards.

### **Bacterial Slime Control in Paper Mills:**

Chlorine dioxide generated from sodium chlorite is effective for use in controlling microbiological growth in white water paper mill systems. The required dosages will vary with the degree of microbiological and process contamination present. Depending on the specific requirements of the system, apply sodium chlorite continuously or intermittently through a chlorine dioxide generating system to achieve a chlorine dioxide residual concentration between 0.1 and 5 ppm. Repeat intermittent treatments as often as necessary to maintain control.

# Mollusk Control in Water Systems:

Chlorine dioxide generated from sodium chlorite may be used for mollusk control in commercial and industrial recirculating and one-pass cooling water systems. The required dosages will vary with the system type and conditions, the degree of water contamination present and the desired level of control. Depending on the extent of the infestation, sodium chlorite may be applied either continuously or intermittently through a chlorine dioxide generating system to achieve the necessary chlorine dioxide residual concentration.

**Veliger Control:** Maintain a continuous chlorine dioxide residual of 0.1 to 5 ppm.

58300-18 New Label: Page 4 of 5 10/13/04 SAL + 01/23/06. 07/30/2010 & 06/24/2011 Notifications

**Intermittent Dose:** Apply chlorine dioxide to obtain a chlorine dioxide residual concentration of 0.2 to 25 ppm. Repeat as necessary to maintain control.

**Continuous Dose:** Maintain a chlorine dioxide residual concentration of up to 2 ppm.

#### **Bacterial Control in Oil Wells and Petroleum Systems:**

Chlorine dioxide is effective in the remediation of bacterial and sulfide contamination commonly found in oilfield production, injection and disposal fluids. The required dosages will vary with process conditions. Sodium chlorite may be applied either continuously or intermittently through a chlorine dioxide generating system to oil well production water as it is separated from the oil and before it is re-injected into the well.

For continuous feeds, chlorine dioxide may be applied at dosages slightly higher than sulfide's oxidative demand as determined by a demand study. For intermittent treatment, apply chlorine dioxide at a shock dosage of 200 to 3,000 ppm.

#### **Wastewater Treatment:**

Chlorine dioxide is effective as both a disinfectant and an oxidant in wastewater treatment. The required dosages will vary with water conditions and the degree of contamination present. For most municipal and other wastewater systems, a chlorine dioxide residual concentration of up to 5 ppm is sufficient to provide adequate disinfection.

For sulfide odor control, between pH 5 to 9, apply a minimum of 5.2 ppm (wt) of chlorine dioxide to oxidize 1 ppm of sulfide (measured as sulfide ion). For phenol destruction, at pH less than 8, 1.5 ppm chlorine dioxide will oxidize 1 ppm phenol; at pH greater than 10, 3.3 ppm chlorine dioxide will oxidize 1 ppm phenol.

{For rigid non-refillable containers less than or equal to 5 gallons}

# Storage and Disposal

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

Pesticide Storage: Keep product in tightly closed container when not in use. Don't drop, roll or skid container. Keep upright. Always replace cover. Store in a cool, dry, well-ventilated area away from heat or open flame. 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 Management/Disposal: Non-refillable container; do not reuse or refill this container. Triple rinse (or equivalent) container 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 beings to drip. Repeat this procedure two more times. Offer for recycling, if available, or reconditioning if appropriate; 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.

{For rigid non-refillable containers greater than 5 gallons}

## Storage and Disposal

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

Pesticide Storage: Keep product in tightly closed container when not in use. Don't drop, roll or skid container. Keep upright. Always replace cover. Store in a cool, dry, well-ventilated area away from heat or open flame. 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 Management/Disposal: Non-refillable container; do not reuse or refill this container. Triple rinse (or equivalent) container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ½ full with water.

58300-18 New Label: Page 5 of 5 10/13/04 SAL + 01/23/06. 07/30/2010 & 06/24/2011 Notifications

Replace and tighten closure. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other 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. Offer for recycling, if available, or reconditioning, if appropriate; 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.

(For refillable containers)

# Storage and Disposal

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

Pesticide Storage: Keep product in tightly closed container when not in use. Don't drop, roll or skid container. Keep upright. Always replace cover. Store in a cool, dry, well-ventilated area away from heat or open flame. 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 Management/Disposal: Refillable container. Refill this container only with sodium chlorite; do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean this container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with a pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure 2 more times. Offer for recycling if available, or reconditioning if appropriate; otherwise, discard in the trash[or dispose of in a sanitary landfill].

{Per PR Notice 2007-4 the batch code/lot number will appear on the non-refillable label or container.}

**Notice:** Seller expressly warrants that this product conforms to its chemical description. To the extent permitted by applicable law, there are no warranties associated with the sale of this product, either express or implied, including but not limited to, the warranties of fitness for a particular purpose or use.



NSF International certifies that this product conforms to the requirements of ANSI/NSF Standard 60 – Drinking Water Treatment Chemicals – Health Effects with maximum use levels for potable water of 10 ppm.

ConSeal International, Inc. 90 Kerry Place, Suite 2 Norwood, MA 02062 (781) 278-0010

{Marketing Claims}

For Industrial Use Algaecide Molluskicide Antimicrobial/Disinfectant

(End of Marketing Claims)

[] Denotes alternate/optional language

<sup>()</sup> Denotes language that does not appear on the market label.