

72852-3

6/21/2011

10 of 13



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

June 21, 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Connie Welch
Agent for PureLine Treatment Systems
Connie Welch and Associates
4196 Merchant Plaza #344
Lake Ridge, VA 22192

Subject: ElectroLite 25
EPA Reg. No. 72852-3
Application Dated: May 24, 2011
Receipt Date: May 24, 2011

Dear Ms. Welch:

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:

- Revised Container Disposal Statement and Alternate Brand Name "PureCide® 25"

Comments:

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

1. Revise the Container Handling, 5 gallons or smaller instructions, to read:

Do not reuse or refill this container. Offer for recycling if available. Offer for reconditioning if appropriate. Triple rinse container promptly after emptying.

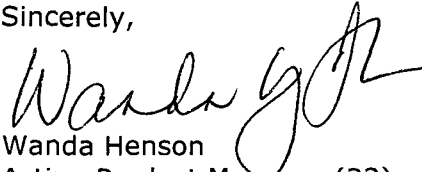
Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

2. Revise the Container Handling, larger than 5 gallons instructions, to include the statement "Turn the container over onto its other end and tip it back and forth several times." preceding the statement beginning "Empty the rinsate..."
3. Revise the Refillable Container instructions by changing the statement "Cleaning or pressure rinsing the container is the responsibility of the person disposing of the container." to read "Cleaning the container before final disposal is the responsibility of the person disposing of the container."

This application for notification to revise the product label and the addition of the alternate brand name, 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)



Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

Application for Pesticide - Section I

1. Company/Product Number 72852-3	2. EPA Product Manager Wanda Henson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PureLine Treatment Systems/Electrolite 25	PM# Acting PM 32	
5. Name and Address of Applicant (Include ZIP Code) PureLine Treatment Systems 647 S. Vermont Street, Palatine, IL 60067 <input checked="" 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.)

- 1) Alternate Brand Name
- 2) Container Disposal Statements Updated

Section - III

1. Material This Product Will Be Packaged In:			
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	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container
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"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name <i>Connie Welch</i>	Title <i>Principal</i>	Telephone No. (Include Area Code) 571-289-0923
2. Signature <i>Connie Welch</i>		6. Date Application Received (Stamped)
3. Title Principal, Connie Welch and Associates		
4. Typed Name Connie Welch	5. Date 5/20/11	

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.

50413

**CONNIE WELCH
AND
ASSOCIATES
ENVIRONMENTAL & MANAGEMENT CONSULTING
WWW.CONNIEWELCHANDASSOCIATES.COM**

**4196 MERCHANT PLAZA, #344
LAKE RIDGE, VIRGINIA 22192**

**E-MAIL: CWELCH@
CONNIEWELCHANDASSOCIATES.COM**

**DIRECT: 571-264-0923
Fax: 703-878-7840**

May 20, 2011

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

Attn: Wanda Henson, Acting PM 32

Subject: Notification of label changes per PR Notice 2007-4, and Request for Alternate Brand Name

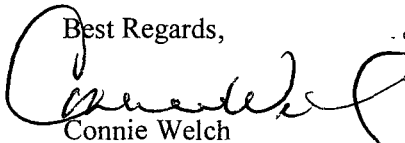
Dear Ms. Henson,

On behalf of PureLine Treatment Systems we are hereby submitting a notification request amending the container disposal language and requesting an alternate brand name for EPA Registration No. 72852-3, Electroicide 25. To this end, please find enclosed the following:

- 1) An application form (8570-1), and
- 2) A copy of the proposed label (updated with requested changes per EPA letter dated 1/20/11) with the above mentioned changes.

No other changes were made to the label.

Thank you for your time and attention concerning this matter. Should you have any questions, please do not hesitate to contact me.

Best Regards,

Connie Welch
Connie Welch and Associates

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Enclosures

Over 25 years of Combined Federal and Consulting Experience, Providing Expertise and Outstanding Service to Chemical, Pesticide, Bio-Chemical and Life Science Companies around the Globe.

PureCide[®] 25

(25% Active Sodium Chlorite)

ACTIVE INGREDIENT: Sodium Chlorite* 25%
OTHER INGREDIENTS 75%
TOTAL 100%

NOTIFICATION
Date Reviewed: 6/21/2011
Reviewed By: W. Ferguson

*AVAILABLE CHLORINE 20%

CONTAINS 2.58 LBS. OF SODIUM CHLORITE PER GALLON AT 70°F

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

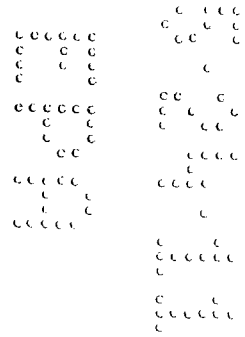
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor immediately for treatment advice.
If on skin or clothing:	<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 if burning or irritation of skin persists.
If swallowed:	<ul style="list-style-type: none"> • Have person sip a glass of water if able to swallow. • Call a poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air and monitor for respiratory distress. • If cough or difficulty in breathing develops, consult a physician immediately. • If person is not breathing, call 911.

	or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. <ul style="list-style-type: none">• Call a poison control center or doctor for further treatment advice.
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For emergency information call: 800-424-9300 (24 hours)
Have the product container or label with you when calling a poison control center or doctor or going to treatment.

NOTE TO PHYSICIAN:
Probable mucosal damage may contraindicate the use of gastric lavage.

PureLine® Treatment Systems
647 S. Vermont Street
Palatine, IL 60067
www.pureline.com



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed. Irritating to nose and throat. May be harmful if inhaled. Do not get in eyes, on skin or on clothing. Wear protective eyewear (splash proof goggles). Wear protective clothing and rubber gloves when handling this product. Avoid breathing mists or fumes. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing to avoid fire.

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.

PHYSICAL AND 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 (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.

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 Sodium Chlorite per 1,000 gals. 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 Sodium Chlorite solution per 1,000 gals. of water in the system twice a week or as needed to maintain control.
4. Add sodium chlorite 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 as a Disinfectant, or for Microorganism or Mollusk Control, and as a Chemical Oxidant in Aquatic Systems

Feed requirements: Feed rates of PureCide® 25 will depend on the severity of contamination and the degree of control desired. The exact dosage will depend on the size of the system and residual necessary for effective control. Depending on the generator type, PureCide® 25 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 and 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 bulletin (or Technical Data Sheet) for specific instructions. Your PureLine representative can guide you in the application techniques.

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

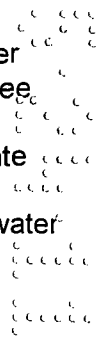
1. The chlorine method which utilizes a Sodium Chlorite solution and chlorine gas, or
2. The hypochlorite method which utilizes a Sodium Chlorite solution, a hypochlorite solution, and an acid, or
3. The Acid-chlorite method which utilizes a Sodium Chlorite solution and an acid, or
4. The electrolytic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

Your PureLine 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 PureCide® 25.

User is responsible for compliance with applicable Federal, State, and Local laws regarding proper use and disposal of the chlorine dioxide generated.

Potable Water Treatment

Chlorine dioxide (ClO₂) 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 byproducts must be monitored as required by the National Primary Drinking Water Regulations (40 CFR Part 141) and state drinking water standards.



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 5.0 ppm. Chlorine dioxide may be applied either continuously or intermittently. The typical chlorine dioxide residual concentration range is 0.1 - 1.0 ppm for continuous doses, and 0.1 - 5.0 ppm for intermittent doses. The minimum acceptable residual concentration of chlorine dioxide is 0.1 ppm for a minimum one minute contact time.

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, system 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 - 0.5 ppm.

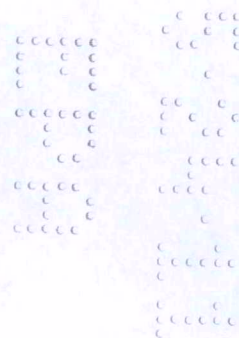
Intermittent Dose: Apply chlorine dioxide to obtain a chlorine dioxide residual concentration of 0.2 - 25 ppm. Repeat as necessary to maintain control.

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

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 hydro coolers. The required dosages will vary with process conditions and the degree of contamination present. Depending on the requirements of the specific water system, sodium chlorite should be applied continuously or intermittently through a chlorine dioxide generating system to achieve a chlorine dioxide residual concentration between 0.25 and 5.0 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 21CFR§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.



Wastewater Treatment

Chlorine dioxide (ClO₂) 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 5-9, a minimum of 5.2 ppm (wt) of chlorine dioxide should be applied 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.

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, sodium chlorite should be applied continuously or intermittently through a chlorine dioxide generating system to achieve a chlorine dioxide residual concentration between 0.1 and 5.0 ppm. Intermittent treatments should be repeated as often as necessary to maintain control.

Directions for Use in Controlling Microbial Population in Poultry Processing Water

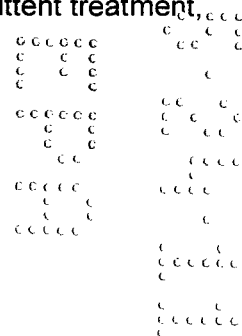
Chlorine dioxide generated from PureCide[®] 25 may be used as an antimicrobial agent in water used in poultry processing, provided that the residual concentration of chlorine dioxide does not exceed 3 ppm, as determined by an appropriate method in accordance with 21CFR§173.300.

For treatment of poultry chill water, apply PureCide[®] 25 as necessary through a chlorine dioxide generation system to maintain a residual concentration of up to 3 parts per million (ppm) chlorine dioxide in the chiller water.

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, chlorine dioxide should be applied at a shock dosage of 200-3000 ppm.



STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food or feed by storage or disposal. Keep product in tightly closed container when not in use. Don't drop, roll or skid drum. Keep upright. Always replace cover. Store in a cool, dry, well-ventilated area away from heat or open flame.

EMERGENCY HANDLING: In case of contamination or decomposition, do not reseal container. If possible, isolate container in open and well-ventilated area. Flood with large volumes of water. If fire occurs, extinguish fire by applying large quantities of water. Any unopened drums near the fire should be cooled by spraying with water.

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 HANDLING: For non-refillable containers 5 gallons or smaller. Do not reuse or refill this container. Offer for recycling if available. Offer for reconditioning if appropriate. Triple rinse container promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 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 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.

For non-refillable containers that are larger than 5 gallons.

Do not reuse or refill this container. Offer for recycling if available. Offer for reconditioning if appropriate. Triple Rinse container promptly after emptying.

Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 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 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or mix tank or store rinsate for later use or disposal. Repeat the procedure two more times.

For refillable containers, all sizes.

Refillable container. Refill this container with PureCide 25 only. Do not reuse this container for any other purpose. Cleaning or pressure rinsing the container is the

responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full of water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing process two more times.

EPA Reg. No. 72852-3
EPA Est. 5382-KS-1^(A), 72852-CA-1^(B),
62215-CO-1^(C), 7350-MN-1^(D)
Superscript on label identifies facility

Lot#: _____
(_____)

Gals. Net

