

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

09/24/14

Ana Rodriguez-Koster Agent/Sabre Oxidation Technologies, Inc. Lewis & Harrison 122 C Street, N.W. Suite 505 Washington, DC 20001

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OCT 16 2014

Subject:

Sabrechlor 25

EPA Registration No. 73139-1 Application Dated: July 8, 2014 Receipt Dated: July 10, 2014

Dear Ms. Rodriguez-Koster:

This acknowledges the receipt of your Amendment application dated July 8, 2014 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) Section 3(c)(5), as amended.

Submission and Proposed Changes

Add additional use directions for specific types of oil field injection water and created a new Alternate 1 CSF for "Sabrechlor 25" label (EPA Reg#73139-1). The proposed label dated 7/8/2014 (pin punch 07/10/14).

Findings and Comments:

Based on the submitted materials, the label amendment noted above is **acceptable**. The latest amended label dated July 8, 2014 (pin punch 07/10/14).

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

This latest amended label and a copy of this letter have been inserted in your file for future reference.

If you have any questions or comments concerning this letter, please contact David Liem at liem.david@epa.gov or call (703) 305-1284, or me at fuller.demson@epa.gov or call 703-308-8062.

Sincerely

Demson Fuller

Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

Att: Accepted stamped label

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

face shield, and use only Neoprene gloves when handling. DANGER: Corrosive. Causes eye and skin damage. Do Personal Protective Equipment (PPE): For sanitization not get in eyes, on skin or on clothing. Wear goggles or May be fatal if swallowed. Irritating to nose and throat. Do not breathe dust, vapors or spray mist. Remove and of food contact surfaces, handlers applying chlorine dioxide in an occupational setting must wear gloves. wash contaminated clothing immediately.

ENVIRONMENTAL HAZARDS

product to sewer systems without previously notifying the streams, ponds, estuaries, oceans or other waters unless in This product is toxic to fish and aquatic organism. Do not contact your State Water Board or Regional Office of the accordance with the requirements of a National Pollutant permitting authority has been notified in writing prior to Discharge Elimination System (NPDES) permit and the local sewage treatment plant authority. For guidance, discharge effluent containing this product into lakes, discharge. Do not discharge effluent containing this

PHYSICAL OR CHEMICAL HAZARDS

combustibles and dust. Do not contaminate product with Strong oxidizing agent. Mix or dilute with water only. Mixing with acids, or alcohol, or other chemicals may garbage, dirt, organic matter, paint products, solvents, acids, vinegar, beverages, oils, pine oils, dirty rags or SABRECHLOR 25 may burn rapidly. Keep handling cause evolution of chlorine and chlorine dioxide gas other foreign matter- Do not expose to hot surfaces, areas and equipment clean and free of oils. greases, mixture which is toxic and may be explosive. Combustible materials contaminated with sparks or open flame.

Sabre Oxidation Technologies, Inc. 2642 Marco Avenue Odessa, TX 79762 Manufactured for:



SABRECHLOR 25

Sodium Chlorite Solution

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

...... 100% Other Ingredients:......75% Total Active Ingredient:

KEEP OUT OF REACH OF CHILDREN DANGER

Call a poison control center or doctor for swallow. Do not induce vomiting unless contact lenses, if present after the first 5 for 15-20 minutes. Call a poison control immediately for treatment advice. Have Take off contaminated clothing. Rinse told to do so by a poison control center minutes, then continue rinsing the eye. skin immediately with plenty of water center or doctor for treatment advice. Call a poison control center or doctor person sip a glass of water if able to gently with water for 15-20 minutes, Hold eye open and rinse slowly and then continue rinsing eye. Remove FIRST AID treatment advice. If on Skin or Clothing: If Swallowed: If in Eyes:

NOTE TO PHYSICIAN: Probably mucosal damage may doctor, or going for treatment. You may also contact the Poison Control Center at 1-800-222-1222 for emergency HOTLINE NUMBER: Have the product container or label with you when calling a poison control center or medical treatment information.

contraindicate the use of gastric lavage.

EPA Reg. No. 73139-1

EPA Est No.

Net Contents: Batch Code:

DIRECTIONS FOR USE

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

METHOD OF APPLICATION

Recognized as Safe (GRAS) acid such as citric, phosphoric, Use SABRECHLOR 25 with a Chlorine Dioxide generator 25 directly to system being treated. Follow all instructions hydrochloric or acetic acid. Do not apply SABRECHLOR solution is then added at a point in the system to be treated SABRECHLOR 25 can be used to form acidified sodium chlorite solutions by mixing the product with a Generally to generate an aqueous chlorine dioxide solution. These producing an aqueous solution of chlorine dioxide. This generators react with SABERCHLOR 25 with either chlorine or a chlorine solution and hydrochloric acid in the Chlorine Dioxide Generator Manual carefully. which ensures uniform mixing. Alternatively,

APPLICATIONS

POTABLE WATER AND WASTEWATER DISINFECTION

dixoide concentrations up to 5.0 ppm are generally adequate. chlorite and chlorate) should be monitored such that it does concentration of total residual oxidants (chlorine dioxide, chlorine dioxide residual concentration up to 2,0 ppm is For most municipal and other potable water systems, a wastewater and sewage applications, residual chlorine not exceed 1.0 ppm in the distribution system. For sufficient to provide adequate disinfection. The

FOOD PROCESSING PLANTS, DAIRIES, BOTTLING PLANTS AND BREWERIES FOOD PLANT PROCESS WATER

system to achieve a chlorine dioxide residual concentration SABRECHLOR 25 through a chlorine dioxide generation For microbial control in typical food processing water systems, such as flume transport, chid water systems, hydrocoolers and retort cooling water, apply ranging from 0.25 to 5.0 ppm.

or doctor. Do not give anything by

mouth to an unconscious person.

Chlorine dioxide generated from SABRECHLOR 25 may subsequent potable water rines requirements provided that the concentration of to all residual oxidants meet the residual oxidants and oxidants are concentration of the concentration also be used as a water sanitizer for fruit and vegetable washing and cut and peeled potato products without a imitations of ≤1.0 ppm

Under the Federal Insecticide, Fungrade OCT 1 6 2014

Rocking de Act es amended, for the

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.

Fruits and vegetables treated with chlorine dioxide must be blanched, cooked, or canned before consumption or distribution in commerce.

POULTRY PROCESSING WATER

Use SABRECHLOR 25 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.

SANITIZATION OF FOOD-CONTACT SURFACES IN FOOD-PROCESSING PLANTS, DAIRIES, BOTTLING PLANTS AND BREWERIES.

and utensils with a suitable detergent or cleaner, followed thoroughly drain and dry from the equipment and surfaces cleared for use on food contact surfaces under the Federal reatment. Then thoroughly wash all equipment, surfaces dioxide. A contact time of at least one minute is required Use SABRECHLOR 25 to generate chlorine dioxide for surfaces, food-processing equipment and utensils. Prior to application, remove gross food particles and soil by a 100 ppm but not more than 200 ppm available chlorine solution generated from the chlorine dioxide generator with potable water to achieve a use-solution of at least pre-flush, or pre-scrape and, when necessary, pre-soak Food. Drug and Cosmetic Act prior to recontact of the use as a terminal no-rinse sanitizer for food-contact by a potable water rinse. Dilute the chlorine dioxide for sanitization. Allow the sanitizing solution to sanitized surface with food or feed items.

ONCE-THROUGH COOLING WATER SYSTEMS

Control of mollusks can be effectively accomplished using SABRECHLOR 25 as directed in commercial and industrial once-through cooling water systems.

SABRECHLOR 25 may be fed on a continuous or slug basis depending on the detector of system folling.

Slug Dose: Add 42 155, of chloranedicxide permillton gallons of water (5 ppt).

million gallons of water (0.25 to 2 ppm)

GENERAL INDUSTRIAL PROCESS WATER TREATMENT (OILFIELD INJECTION WATER, WHITE WATER PAPER MILL SYSTEMS, AND RECIRCULATING COOLING TOWERS)

Use SABRECHLOR 25 to generate chlorine dioxide for the control of microbial slime in the above water systems. In order to achieve adequate control, the chlorine dioxide residual concentration should be between 0.25 and 5.0 ppm in process water or paper making and cooling systems.

WATER FLOODS

Chlorine dioxide should be added to a water flood system at a point of uniform mixing. Add 5 to 1,000 ppm Chlorine dioxide to the system based on system loading. Repeat until control is achieved. Chlorine dioxide residual should be less than 5 ppm throughout the system.

FRAC FLUID PROCESS WATER

Chlorine dioxide reduces bacterial contamination in frac water. Add Chlorine dioxide to or prior to the frac water storage tanks or directly into chemical blender or post blender prior to water being pumped down hole. In order to achieve adequate control, the chlorine dioxide residual concentration should be less than 5 ppm in frac water well flow back.

FRAC PROCESS WATER USED FOR HYDRATION OF POLYMER/GUAR USED IN HYDRAULIC FRACTURING FLUIDS.

Chlorine dioxide controls microbial loading while increasing polymer hydration efficiency in fracturing fluids, polymers and gels used in oil and gas well stimulations. In order to achieve adequate control, the chlorine dioxide residual concentration should be less than 5 ppm in frac water well flow back.

DRILLING, COMPLETION, AND WORKOVER FLUIDSChlorine dioxide should be added to a drilling fluid system at a point of uniform mixing such as the circulating mud tank. Initial treatment: Add 50 to 1,000 ppm Chlorine dioxide to achieve a residual of less than 5 ppm return circulating

OIL PRODUCTION, GAS PRODUCTION AND TRANSMISSION PIPELINES, PITS, TANKS AND SYSTEMS

Chlorine dioxide should be added directly to an oil production or transmission line. The application should be conducted to ensure adequate mixing of Chlorine dioxide. The chlorine dioxide concentration in the pipeline should be less than 5 ppm at the farthest points of the pipeline. Injections to the system should be on as needed to maintain control.

STORAGE AND DISPOSAL

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

PESTICIDE 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 directions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING:

Nonrefillable container. For Non-refillable Containers: J
Nonrefillable container. Do not reuse or refill this container.
Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying. If recycling is not available, puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Refillable container. Refill this container with this product only. 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 the container before final disposal, empty remaining contents from container for use according to use directions and triple rinse promptly after emptying. Offer for recycling, if available. If recycling is not available, puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.