81987-2

03-01-2010

UNITED ST ES ENVIRONMENTAL PROTECTION A .NCY WASHINGTON, D.C. 20460



United States Environmental Protection Office of Pesticide Programs

MAR - 1 2010

Erik Balling Operations Manager California Water Services 700 W. Elm St. Coalinga, CA 93210

FILE COPY

Subject:

Drip Clear-Sodium Hypo Chlorite

EPA Registration No. 81987-2 Application Date: January 19, 2010 Receipt Date: February 02, 2010

Dear Mr. Balling:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification:

Response to Agency letter dated July 01, 2009

Comments:

1. Revise the "Storage and Disposal" statement on page four (4) to adhere PR Notice 2007-4 by stating the following appropriate container disposal statements.

Container Disposal

(5 gallons or less)(Plastic/Metal Containers)

Nonrefillable Container. Do not refill or reuse container. Triple rinse as follows:

Empty remaining contents into application equipment or a mix tank. Drain for 10 seconds after the flow begins to drip. Fill 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 procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

Container Disposal

(5 gallons or more)(Plastic/Metal Containers)

Nonrefillable Container. Do not refill or reuse container. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least on 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 the application equipment or mix tank or store rinsate for later use or disposal.

7

Repeat this cedure two more times. Then offer f reconditioning. If not available, puncture and dispose in a sanitary landfill.

2. The desired residual under the "Superchlorination" use directions must be declared at 10-20 ppm.

General Comments:

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable with above comment and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Y. Henson

Acting Product Manager (32)

Regulatory Management Branch II

Antimicrobials Division (7510P)

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Water & Wastewater Utilities Management Services Agricultural Chemical Injection Systems Ph: (559) 935-2300 • Fax: (559) 935-1347 • E-mail: office@calh2o.com

January 19, 2010

U.S. environmental Protection Agency Office of Pesticide Programs Antimicrobials Division (7510P) 1200 Pennsylvania Avenue NW Washington, D.C. 20460

Re: Drip Clear Sodium Hypochlorite 81987-2

Dear Ms Mitchell,

We are submitting the revised label for notification that the requested changes in your July 1 2009 letter have been made. I have included a copy of an email dated December 8, 2009 from Wanda Henson discussing some of the requested changes in your July 1 2009 letter.

In item G of your letter you stated that "The desired residual under the "Superchlorination" use directions must be declared at 10-20 ppm." In the email to Wanda Henson I explained that a residual of 10-20 ppm was the desired residual for a periodic shock treatment. For a superchlorination we would like the residual to be higher than that of a periodic shock. A superchlorination is performed when normal continuous or periodic shock treatments have failed to remove the algae or bacterial fouling. For this reason the allowed residual for a superchlorination was stated to be between 50-100 ppm. Based on the December 8, 2009 email from Wanda Henson we left the language in the label as originally submitted.

In item F "The residual chlorine should be between 1.0 ppm and 2.0 ppm with a pH of 7.2-7.6." was not added to the label because the label instruction allow for higher dosages for shock treatments. The statement could be seen by field level enforcement as maximum allowable residuals.

Please call or email me if you have any questions or concers with the reviesed label.

Sincerely,

Erik Balling

California Water Services

559-935-2300

eballing@calh2o.com

Drip Clear – Sodium Hypochlorite

ACTIVE INGREDIENT - Sodium Hypochlorite 12.5% OTHER INGREDIENTS 87.5%

NOTIFICATION Reviewed By:

TOTAL

100.0%

Available Chlorine 12.5%

KEEP OUT OF REACH OF CHILDREN

DANGER

	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 five minutes, then continue rinsing eye. Call 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 poison control center or doctor for treatment advice.
If swallowed:	 Call poison control center or doctor for treatment advice. Have person sip a glass of water if able to sallow. 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:	 If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call poison control center or doctor for treatment advice.
litaria de a completa de com	HOT LINE NUMBER
	tainer or label with you when you call a poison control center or doctor. You on Center at 1-800-222-1222 for emergency medical treatment information.
may contact the rois	NOTE TO PHYSICIAN
Probable	mucosal damage may contraindicate the use of gastric lavage

See other precautions on this label.

California Water Services Coalinga, CA 93210

EPA REG. NO 81987-2

EPA Est. No.

California Water Services

Olin Chlor Alkali Products

Sierra Chemical Co Jones Chemical Co.

Los Angeles Chemical Company

Hasa

81987 - CA-1

61667 - CA-1, CA-2, 11138 - CA-1, CA-2

10897 - CA-1, CA-2

8996 - CA-1 1744 - CA-1

962 -CA-1, 962 - CA-2, 962 - CA-3

10897 - CA-1, CA-2

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. May cause severe skin irritation or chemical burns to broken skin. Causes eye damage. May be fatal if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or safety glasses and rubber gloves when handling this product. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid breathing vapors. Vacate poorly ventilated areas as soon as possible. Do not return until odors have dissipated. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- 1. Goggles or face shield
- 2. Long-sleeved shirt and long pants
- 3. Waterproof gloves
- 4. Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

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 public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or regional office of U.S. Environmental Protection Agency.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT: Use only according to label directions. Mixing this product with gross filth, such as feces, urine, etc. or with ammonia, acids, detergents, or other chemicals will release hazardous gases which are irritating to eyes, lungs and mucous membranes.



DIRECTIONS FOR USE

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

Note – This product degrades with age. Use a chlorine test kit and increase dosage as necessary to obtain the desired level of available chlorine. Chlorine demand will change depending on the water temperature and purity.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirement for protection of workers.

This product is to be applied through irrigation systems only for agricultural crops and only where this manner of use will not cause crop damage. Drip Clear – Sodium Hypochlorite is an additive that controls both algae and bacterial growth. The dosage in ppm of Drip Clear – Sodium Hypochlorite required for injection into the water supply can be calculated by the following equation:

(0.006) x (ppm desired) x (system flow rate in gallons per minute) / 0.11

With a chlorine test kit, determine the residual chlorine at the farthest point from the injection point. Chlorine demand will change depending on the water temperature and purity.

<u>DO NOT</u> connect any irrigation system, including greenhouse systems into which Drip Clear – Sodium Hypochlorite is to be added, to a public water system unless safety devices prescribed by the state Department of Health, safe Drinking Water Branch, for cross connection protection are in place.

<u>DO NOT</u> apply when fertilizers, herbicides, and insecticides are being injected since they will consume the available chlorine and may produce toxic reaction products.

Shut down the feed as soon as the irrigation water is switched to the next irrigation sector. Leave the treated water residing in the sections that have been shut down.

Continuous chlorination is recommended for irrigation water containing high levels of bacteria, algae or other bio-fouling that reduces irrigation system performance. Chlorine should be injected at a dosage that will yield 1 ppm to 2 ppm of free residual chlorine. Residuals should be taken at the end of the furthest lateral from the injection point with a chlorine residual test kit. An increase or decrease of chlorine dosage will need to be made periodically to achieve/maintain, a free residual chlorine yield of 1 ppm to 2 ppm as weather and water conditions change.

Periodic shock treatments at a higher chlorine dosage of 10 ppm to 20 ppm may be performed during the irrigation season. One day after the shock treatment the irrigator should open the ends of the irrigation lines to flush out any algae, bacteria or other build up which may have been clogging the lines.

Superchlorination, which is increasing the chlorine dosage concentrations to between 50 and 100 ppm is recommended if systems are clogged by algae, bacteria or root intrusion. After the proper chlorine dosage has been set on the chlorinator inject the chlorine until the desired residual is achieved at the furthest lateral from the injection point. Once the desired residual is achieved turn off the water to the system for 24 hours. The high concentration of chlorine will vigorously attack organic material and will help clear the blockage. After the high concentration has set in the system for 24 hours flush the irrigation system until there is no longer free chlorine residual in the system.

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SENSITIVE PLANT SPECIES

Certain plants, including various species of trees, flowers, shrub, agronomic crops, fruits and vegetables are adversely affected by chlorinated irrigation. The use of this product can impact the growth, appearance and health of plants.

Begonias, geraniums and other ornamental plant species are known to be sensitive to continuous chlorination at levels of 1-2 ppm free chlorine. Plant species such as tomato, lettuce, broccoli, and petunia are sensitive to periodic chlorination levels of 10-20 ppm free chlorine.

If uncertain of a plant's tolerance, consult an agronomist or a support agency such as your local University Extension Service or your local agent of the US Department of Agriculture.

STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spills, flood areas with large quantities of water. If container required a deposit, return it to distributor for a refund. Refilling limitations are on the container.

WARRANTY AND DISCLAIMER

California Water Services warrants that this material conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use, subject to the risks referred to therein.

California Water Services makes no other express or implied warranty of fitness or merchantability or any other express or implied warranty is made regarding performance, stability or otherwise warranty.

In no case shall California Water Services be liable for consequential, special or indirect damages resulting from the use or handling of this product including, but not limited to, loss of profits, business reputation, or customers; labor cost, or other expenses incurred.

In no case shall California Water Services be liable for the consequences resulting from the misuses or mishandling of this product.

California Water Services offers this product and the buyer and user accept it subject to the foregoing conditions of sale and warranty which may be varied only by agreement in writing signed by an authorized representative of California Water Services.

