

86197-4

07/19/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

JUL 19 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Madhu Mandava  
Agent for FSTI, Inc.  
Mandava Associates, LLC  
6860 N Dallas Parkway  
Suite 200  
Plano, TX 75024

**FILE COPY**

Subject: Huish-Sodium Hypochlorite 10%  
EPA Reg. No. 86197-4  
Application Dated: June 1, 2010  
Receipt Date: June 22, 2010

Dear Mr. Mandava:

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:**

- Primary Brand Name "FSTI Sodium Hypochlorite 10%"

**Comments:**

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

This application for notification to change the primary brand name, as referenced above, is acceptable. A copy has been placed in our records for future reference.

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

Sincerely,

A handwritten signature in black ink that reads "Wanda Henson".

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

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United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 86197-4	2. EPA Product Manager Wanda Henson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) FSTI Sodium Hypochlorite 10%	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) FSTI, Inc. 6300 Bridgepoint Parkway, Ste 1-200 Austin, TX 78730 <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**

Amendment - Explain below.  Final printed labels in response to Agency letter dated \_\_\_\_\_

Resubmission in response to Agency letter dated \_\_\_\_\_  "Me Too" Application.

Notification - Explain below.  Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

1) Notification Per PR Notice 98-10 of Primary Brand Name Change to FSTI Sodium Hypochlorite 10%. "This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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." 2) Please direct all correspondence to: Madhu Mandava, Mandava Associates LLC, 6860 N. Dallas Parkway, Suite 200, Plano, TX 75035 Phone: 972-265-7924 Fax: 972-265-7942 E-mail: madhu@mandava.com

**Section - III**

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input 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	2. Type of Container <input type="checkbox"/> Metal <input checked="" 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  
 Label  Container

4. Size(s) Retail Container

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product  
 Lithograph  Paper glued  Stenciled  Other \_\_\_\_\_

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Madhu Mandava, Mandava Associates, LLC	Title Agent for FSTI, Inc.	Telephone No. (Include Area Code) 972-265-7924
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**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.

2. Signature	3. Title Agent for FSTI, Inc.	6. Date Application Received (Stamped)
4. Typed Name Madhu Mandava, Mandava Associates, LLC	5. Date 5-28-10	

# MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

6860 N Dallas Parkway, Suite 200, Plano, TX 75024

Telephone: (972) 265-7924 / Fax: (972)-265-7942 / E-MAIL: [Madhu@Mandava.com](mailto:Madhu@Mandava.com) / [www.Mandava.com](http://www.Mandava.com)

Via Federal Express

June 1, 2010

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

Attention: Wanda Henson  
Antimicrobials Division  
Regulatory Management Branch II

Subject: FSTI, Inc.  
FSTI, Inc., EPA Registration No. 86197-4  
Huish-Sodium Hypochlorite 10%  
Notification per PR-Notice 98-10 of Primary Brand Name Change

Dear Ms. Henson:

On behalf of FSTI, Inc., enclosed please find the notification change of Primary Brand Name.

Primary Brand Name Change from Huish-Sodium Hypochlorite 10% to **FSTI Sodium Hypochlorite 10%**

Included with this submission please find the following:

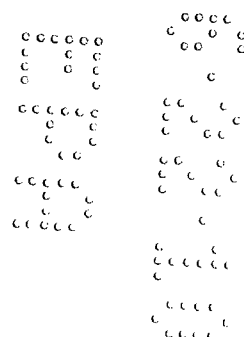
1. Application for Pesticide Registration Notification (EPA Form 8570-1)
2. Two Copies of Proposed Label Notification with Changes Clearly Marked
3. One Copy of Previously Approved Label

If you should have any questions, please contact me at 972-265-7924.

Sincerely Yours,

  
Madhu Mandava  
Agent for FSTI, Inc.

Enclosure



Active Ingredient:  
Sodium Hypochlorite..... 12.50%  
Other Ingredients..... 87.5%  
Total..... 100.0%  
Available Chlorine 11.9%

NOTIFICATION  
Date Reviewed: 7/19/2010  
Reviewed By: [Signature]



## 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 5 minutes, then continue rinsing eye. Call a 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 a poison control center or doctor for 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 a 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, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**Note to physician:** Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when calling a poison control center or doctor for treatment advice. Contact the Poison Center at 1-800-222-1222 for 24 hour emergency medical treatment information.

### 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 required level of available chlorine.

#### SANITIZATION OF NONPOROUS FOOD CONTACT SURFACES

**RINSE METHOD** - A solution of 100 ppm available chlorine may be used in the sanitizing solution if a chlorine test kit is available. Solutions containing an initial concentration of 100 ppm available chlorine must be tested and adjusted periodically to insure that the available chlorine does not drop below 50 ppm. Prepare a 100 ppm sanitizing solution by thoroughly mixing 1 oz. of this product with 10 gallons of water. If no test kit is available, prepare a sanitizing solution by thoroughly mixing 2 oz. of this product with 10 gallons of water to provide approximately 200 ppm available chlorine by weight. Clean equipment surfaces in the normal manner. Prior to use, rinse all surfaces thoroughly with the sanitizing solution, maintaining contact with the sanitizer for at least 2 minutes. If solution contains less than 50 ppm available chlorine, as determined by a suitable test kit, either discard the solution or add sufficient product to reestablish a 200 ppm residual. Do not rinse equipment with water after treatment and do not soak equipment overnight. Sanitizers used in automated systems may be used for general cleaning but may not be re-used for sanitizing purposes.

**IMMERSE METHOD** - A solution of 100 ppm available chlorine may be used in the sanitizing solution if a chlorine test kit is available. Solutions containing an initial concentration of 100 ppm available chlorine must be tested and adjusted periodically to insure that the available chlorine does not drop below 50 ppm. Prepare a 100 ppm sanitizing solution by thoroughly mixing 1 oz. of this product with 10 gallons of water. If no test kit is available, prepare a sanitizing solution by thoroughly mixing 2 oz. of this product with 10 gallons of water to provide approximately 200 ppm available chlorine by weight. Clean equipment in the normal manner. Prior to use, immerse equipment in the sanitizing solution for at least 2 minutes and allow the sanitizer to drain. If solution contains less than 50 ppm available chlorine, as determined by a suitable test kit, either discard the solution or add sufficient product to reestablish a 200 ppm residual. Do not rinse equipment with water after treatment. Sanitizers used in automated systems may be used for general cleaning but may not be re-used for sanitizing purposes.

**FLOW/PRESSURE METHOD** - Disassemble equipment and thoroughly clean after use. Assemble equipment in operating position prior to use. Prepare a volume of a 200 ppm available chlorine sanitizing solution equal to 110% of volume capacity of the equipment by mixing the product in a ratio of 2 oz. product with 10 gallons of water. Pump solution through the system until full flow is obtained at all extremities, the system is completely filled with the sanitizer and all air is removed from the system. Close drain valves and hold under pressure for at least 2 minutes to insure contact with all internal surfaces. Remove some cleaning solution from drain valve and test with a chlorine test kit. Repeat entire cleaning/sanitizing process if effluent contains less than 50 ppm available chlorine.

**CLEAN-IN-PLACE METHOD** - Thoroughly clean equipment after use. Prepare a volume of a 200 ppm available chlorine sanitizing solution equal to 110% of volume capacity of the equipment by mixing the product in a ratio of 2 oz. product with 10 gallons of water. Pump solution through the system until full flow is obtained at all extremities, the system is completely filled with the sanitizer and all air is removed from the system. Close drain valves and hold under pressure for at least 10 minutes to insure contact with all internal surfaces. Remove some cleaning solution from drain valve and test with a chlorine test kit. Repeat entire cleaning/sanitizing process if effluent contains less than 50 ppm available chlorine.

**SPRAY/FOG METHOD** - Pre-clean all surfaces after use. Use a 200 ppm available chlorine solution to control bacteria, mold or fungi and a 600 ppm solution to control bacteriophage. Prepare a 200 ppm sanitizing solution of sufficient size by thoroughly mixing the product in a ratio of 2 oz. product with 10 gallons of water. Prepare a 600 ppm solution by thoroughly mixing the product in a ratio of 6 oz. product with 10 gallons of water. Use spray or fogging equipment which can resist hypochlorite solutions. Always empty and rinse spray/fog equipment with potable water after use. Thoroughly spray or fog all surfaces until wet, allowing excess sanitizer to drain. Vacate area for at least 2 hours. Prior to using equipment, rinse all surfaces treated with a 600 ppm solution with a 200 ppm solution.

# Sodium Hypochlorite 10%

## Disinfectant • Sanitizer

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**DANGER:** Corrosive. May cause severe skin and eye irritation or chemical burns. Causes eye damage. Wear safety glasses or goggles and rubber gloves when handling this product. Do not get into eyes, on skin or on clothing. Do not breathe vapor or spray mist. Vacate poorly ventilated areas. Do not return until strong odors dissipate. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, using tobacco, or, using restroom. Remove and wash contaminated clothing before reuse.

#### Environmental Hazards

This product is toxic to fish and aquatic organisms. Do not discharge into lakes, streams, ponds, or public waterways unless in accordance with a NPDES permit. For guidance contact the regional office of the U.S. Environmental Protection Agency.

#### Physical and Chemical Hazards

**STRONG OXIDIZING AGENT:** Mix only with water according to label directions. Mixing this product with chemicals (e.g. ammonia, acids, detergents, etc.) or organic matter (e.g. urine, feces, etc.) will release chlorine gas which is irritating to eyes, lungs and mucous membranes.

## STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not reuse container but place in trash collection. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

### DISINFECTION OF DRINKING WATER (EMERGENCY/PUBLIC/INDIVIDUAL/SYSTEMS)

**PUBLIC SYSTEMS** - Mix a ratio of 1 oz. of this product to 100 gallons of water. Begin feeding this solution with a hypochlorinator until a free available chlorine residual of at least 0.2 ppm and no more than 0.6 ppm is attained throughout the distribution system. Check water frequently with a chlorine test kit. Bacteriological sampling must be conducted at a frequency no less than that prescribed by the National Interim Primary Drinking Water Regulations. Contact your local Health Department for further details.

**INDIVIDUAL WATER SYSTEMS: DUG WELLS** - Upon completion of the casing (lining), wash the interior of the casing (lining) with a 100 ppm available chlorine solution using a stiff brush. This solution can be made by thoroughly mixing 1 oz. of this product into 10 gallons of water. After covering the well, pour the sanitizing solution into the well through both the pipesleeve opening and the pipeline. Wash the exterior of the pump cylinder also with the sanitizing solution. Start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours, flush well until all traces of chlorine have been removed from the water. Consult your local Health Department for further details.

**INDIVIDUAL WATER SYSTEMS: DRILLED, DRIVEN & BORED WELLS** - Run pump until water is as free from turbidity as possible. Pour a 100 ppm available chlorine sanitizing solution into the well. This solution can be made by thoroughly mixing 1 oz. of this product into 10 gallons of water. Add 5 to 10 gallons of clean, chlorinated water to the well in order to force the sanitizer into the rock formation. Wash the exterior of the pump cylinder with the sanitizer. Drop pipeline into well, start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours, flush well until all traces of chlorine have been removed from the water. Deep wells with high water levels may necessitate the use of special methods for introduction of the sanitizer into the well. Consult your local Health Department for further details.

**INDIVIDUAL WATER SYSTEMS: FLOWING ARTESIAN WELLS** - Artesian wells generally do not require disinfection. If analyses indicate persistent contamination, the well should be disinfected. Consult your local Health Department for further details.

**EMERGENCY DISINFECTION** - When boiling of water for 1 minute is not practical, water can be made potable by using this product. Prior to addition of the sanitizer, remove all suspended material by filtration or by allowing it to settle to the bottom. Decant the clarified, contaminated water to a clean container and add 1 drop of this product to 20 gallons of water. Allow the treated water to stand for 30 minutes. Properly treated water should have a slight chlorine odor, if not, repeat dosage and allow the water to stand an additional 15 minutes. The treated water can then be made palatable by pouring it between clean containers for several times.

#### AGRICULTURAL USES

**FOOD EGG SANITIZATION** - Thoroughly clean all eggs. Thoroughly mix 2 oz. of this product with 10 gallons of warm water to produce a 200 ppm available chlorine solution. The sanitizer temperature should not exceed 130° F. Spray the warm sanitizer so that the eggs are thoroughly wetted. Allow the eggs to thoroughly dry before casing or breaking. Do not apply a potable water rinse. The solution should not be re-used to sanitize eggs.

**FRUIT & VEGETABLE WASHING** - Thoroughly clean all fruits and vegetables in a wash tank. Thoroughly mix 5 oz. of this product in 200 gallons of water to make a sanitizing solution of 25 ppm available chlorine. After draining the tank, submerge fruits or vegetables for 2 minutes in a second wash tank containing the recirculating sanitizing solution. Spray rinse vegetables with the sanitizing solution prior to packing. Rinse fruit with potable water only prior to packaging.

Manufactured by:

FSTI INC., 6300 BRIDGEPOINT PARKWAY, Suite 1-200, AUSTIN, TX 78730

NET CONTENTS:



5 GALLONS



15 GALLONS



30 GALLONS



55 GALLONS



330 GALLONS

EPA REG. NO. 86197-74

EPA EST. NO. 86197-TX-001

24 Hour Emergency 1-800-510-8510

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