

11-2-81

TECHNICAL SUPPORT SECTION CHEMISTRY REVIEW - II

Disinfectants Branch

PA Reg. No. or File Symbol 1677-ON
 Date Division Received 6-17-81
 Products Manager No. 32 (Castillo)
 Product Name Cut-Bac
 Company Name Economics

Comments:

- Please clarify your raw material source and manufacturing procedure. Your raw material source does not list [redacted]
- The manufacturing procedure does not agree with Confidential Formula. The manufacturing procedure does not include octanoic and decanoic acids. Please clarify this discrepancy.
- Submit chemical composition of [redacted]
- "Alkanoic (C₈-59%, C₁₀-41%) Acid" is not acceptable name in the ingredient statement. You must declare each acid by its proper chemical name and corresponding percentages.
- For proper container and pesticide disposal instructions please refer to enclosure 134 and 136.

Note to PM

please note that according to Dr. Engler, Citric acid, Octanoic acid, and Decanoic acid should be inert ingredients. I talked to Dr. Engler about it. He asked me to make a note to PM that he would like to see you discuss this and decide what to do with formulations as this one.

INERT INGREDIENT INFORMATION IS NOT INCLUDED

| | | |
|-----------------------------|---------------------|---------------------|
| REVIEW COMMENTS SHEET | 1. Application Date | 2. Registration No. |
| 3. Response Code | | |
| | 4. Date Received | 5. Telephone No. |
| | | |
| 6. Applicant Name & Address | 7. Originator | |
| 7. Product Name | | |

COMMENTS

Note to PM: Dr. Engler says that
citric acid, citraic acid (C) and
decanoic acid (P) are not active ing
Therefore, the ingredients statement
should read:

ACTIVE INGREDIENTS

Phosphoric acid 22.5%

INERT INGREDIENTS 77.5%

100.00

Refer to Skopien for Disposal Status

[Signature]
6/17/51

TABLE XIII--PESTICIDE DISPOSAL STATEMENTS

| HAZARDOUS WASTE | NON-HAZARDOUS WASTE |
|--|---|
| Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to Federal or approved state procedures under Subtitle C of the Resource Conservation and Recovery Act. | Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, state, or local procedures. |

TABLE XIV--CONTAINER DISPOSAL STATEMENTS

| Container Type | Disposal statement |
|--------------------------|--|
| Metal containers | Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures. |
| Plastic containers | Triple rinse (or equivalent). Then offer for recycling or reconditioning, or dispose of in a sanitary landfill, or by incineration if allowed by state and local authorities. |
| Glass containers | Triple rinse (or equivalent). Then dispose of in a sanitary landfill, or by other approved state and local procedures. |
| Fiber drums with liners | Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum cannot be reused ¹ , dispose of in the same manner. |
| Paper and plastic bags | Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of bags in a sanitary landfill or by incineration if allowed by State and local authorities. |
| Compressed gas cylinders | Return empty cylinder for reuse (or similar wording). |

¹Manufacturer may replace this phrase with one indicating whether and how fiber drum may be reused.