

5-13-94

AMENDMENT

EFFICACY EVALUATION AND TECHNICAL MANAGEMENT SECTION

EFFICACY REVIEW

ANTIMICROBIAL PROGRAM BRANCH

IN 05/11/94 OUT 05/13/94

Reviewed by Srinivas Gowda Date 05/13/94

EPA Reg. No. or File Symbol 4959-41

Date Division Received 10-27-93

Type Product Food Contact Surface Sanitizer

MRID No (s) None

Product Manager PM 32 (Douglas)

Product Name ECONOSAN ACID SANITIZER

Company Name WESTAGRO, WEST AGRO, INC.

Submission Purpose Resubmission in response to Agency letter dated Sept. 30, 1993 with requested pH of end use sanitizing solution (1 ounce/6 gallons) and clarifying information with revised label

Type Formulation Liquid

<u>Active Ingredient (s):</u>	<u>%</u>
Decanoic Acid.....	3.0
Nonanoic Acid.....	3.0
Phosphoric Acid.....	8.5
Sulfuric Acid.....	9.5
Propionic Acid.....	10.0

200.0 **Introduction**

200.1 **Uses:**

See proposed label dated 10-27-93.

200.2 **Background Information:**

The submission received 10-27-93, is in response to Agency letter dated Sept. 30, 1993, with requested pH of end use sanitizing solution (1 ounce/6 gallons) and clarifying information with revised label.

201.0 **Data Summary**

None.

201.1 **Abstract of Test Reports:**

None.

201.2 **Brief Description of Tests:**

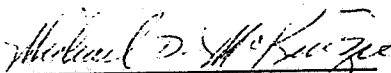
None.

To: Beach cc: T. Hemling	From: M. McKinzie Date: October 20, 1993
Subject: Use Solution pH of Econosan Acid Sanitizer	
Reference:	

The pH of a 1 oz/6 gallon dilution of Econosan, in both deionized water and AOAC 500 ppm synthetic hard water, is shown below.

<u>Deionized</u>	<u>AOAC 500 ppm Hard</u>
2.61	2.95

The reason for stating that the end use sanitizing solution should have a pH of 4, or below, is to ensure that the fatty acid ingredients (nonanoic and decanoic acids) are maintained in their acid forms. It is, primarily, the acid forms of these ingredients which are germicidally active, as opposed to their base-neutralized forms. Though these acids are not actually neutralized at a pH of 4, maintaining the solution pH at or below this level guarantees a comfortable margin of safety.


Michael D. McKinzie

ELONOSAN ACID SANITIZER

Page 4 is not included in this copy.

Pages _____ through _____ are not included.

The material not included contains the following type of information:

- Identity of product inert ingredients.
 - Identity of product impurities.
 - Description of the product manufacturing process.
 - Description of quality control procedures.
 - Identity of the source of product ingredients.
 - Sales or other commercial/financial information.
 - A draft product label.
 - The product confidential statement of formula.
 - Information about a pending registration action.
 - FIFRA registration data.
 - The document is a duplicate of page(s) _____.
 - The document is not responsive to the request.
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
