



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 14, 2018

Christina M. Swick
Lewis & Harrison
122 C Street NW / Suite 505
Washington, DC 20001

Subject: Notification per PRN 98-10 – *Adding minor label changes: Establishment Numbers, Company Name and Address, “hard, non-porous”, “food contact surfaces” and optional graphics*
Product Name: **Trugard 600**
EPA Registration Number: 833-9
Application Date: 05/15/2018
Decision Number: 541460

Dear Ms. Swick:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, please contact Stacey Grigsby by phone at 703.305.6440, or via email at grigsby.stacey@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Stacey Grigsby".

Stacey Grigsby
Regulatory Risk Manager, 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

NOTIFICATION

833-9

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

06/14/2018

TRUGARD 600

TRUGARD 600 is a non-iodine blended acid sanitizer for C.I.P and C.O.P Systems, Tanks and Backflush systems.

ACTIVE INGREDIENTS:

Decanoic Acid	3.0%
Nonanoic Acid	3.0%
Phosphoric Acid	8.5%
Sulfuric Acid	9.5%
Propionic Acid	10.0%

INERT INGREDIENTS	66.0%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN DANGER

See left panel for additional precautionary statements.

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. Call a Poison Control Center or doctor for treatment advice.

IF ON SKIN: 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 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 by mouth. Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER: In case of emergency call toll free 1-800-424-9300. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

NOTE TO PHYSICIAN:

Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Registration No. 833-9

EPA Est. No. 833-PA-1, 833-LA-1, 83199-SD-1, 47862-CA-1, 35939-GA-1

Net Contents:

Lot No.:

Precautionary Statements Hazards to Humans and Domestic Animals

DANGER PELIGRO

Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through the skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

Personal Protective Equipment (PPE)

Applicator and handlers must wear coveralls over long sleeved shirt and long pants, socks and chemical-resistant footwear, goggles or face shield and chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, PV or viton).

PHYSICAL & CHEMICAL HAZARDS

Mix only with water following label directions. Do not mix with chlorinated cleaners or sanitizers. Toxic chlorine gas will be formed. Contact with soft metals may generate hydrogen gas.

ENVIRONMENTAL HAZARDS

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

MANUFACTURED BY:
ALEX C. FERGUSON, LLC
5121 COFFEY AVENUE
CHAMBERSBURG, PA 17201
TEL: 1-800-345-1329

For emergencies, Call Chemtrec 800-424-9300 (Chemtrec Customer No. 837)

Directions For Use

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

On pre-cleaned, hard, non-porous food contact surfaces TRUGARD 600 is an effective sanitizing agent against Escherichia coli and Staphylococcus aureus.

Application Instruction: Food Processing and Dairy Equipment:

Remove gross food particles and soil by a pre-flush or pre-scrape, and when necessary, pre-soak treatment. Clean all surfaces with an appropriate chlorinated alkaline cleaner, followed by a potable water rinse prior to the application of the sanitizing solution.

Sanitize equipment prior to use with a solution of 1-2 oz. TRUGARD 600 per 6 gallons of water, to provide 90-180 ppm of decanoic and nonanoic acid. Circulate sanitizing solution through CIP or COP systems for a minimum of 2 minutes contact time. Sanitizing solution must have a PH of 4 or below. Adequately drain solution. For mechanical operations, the prepared use solution may not be re-used for sanitizing, but may be re-used for other purposes such as cleaning. For manual operations, fresh sanitizing solution should be prepared daily or more often if the solution becomes dirty or soiled.

Follow State and local Health Department regulations for cleaning and sanitizing food processing and dairy equipment.

Regular use of TRUGARD 600 will prevent formation of milkstone and mineralstone on food contact surfaces.

Storage and Disposal

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

PESTICIDE STORAGE: Keep container closed when not in use. Do not store below 0°F for extended periods.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of pesticide wastes or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest Regional Office for guidance.

CONTAINER DISPOSAL: Contact manufacturer for recycling/reconditioning of container.

For consumer: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

Capacity greater than 5 gallon containers -Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one 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 application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning if available. If not, puncture and dispose of in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

HMIS HAZARD RATING	
HEALTH	2
FLAMMABILITY	0
REACTIVITY	1
PERSONAL PROTECTION	D

