

MAR - 5 1998

Dr. Jim T. Hill, Agent
Alex Fergusson, Inc.
c/o SRS International Corp.
1625 K Street, NW #1000
Washington, DC 20006-1604

Dear Dr. Hill:

Subject: Reregistration Eligibility Decision Document for
pesticide case mineral acids
AFCO Low Foam Tops
EPA Registration No. 833-65

The amendment referred to above submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

The change in formulation is acceptable and agree with the label claim. This information has been placed in this product file.

Labeling Revisions

Revise the precautionary statement as follows:

Corrosive. Causes irreversible eye damage or skin burns. May be fatal if swallowed. Harmful if adsorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wear goggles or face shield. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

Revise the statements of practical treatment as follows:

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available. Drink large quantities of water. Avoid alcohol. If person is unconscious, do not give anything by mouth.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

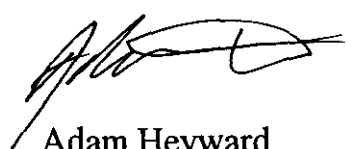
IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Submit two copies of you final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely,



Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510W)

Enclosure

Best copy available

PRECAUTIONARY STATEMENTS

...get in eye...
...wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

"This pesticide is toxic to fish and aquatic organisms." 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 without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Strongly acidic. Avoid contact with alkaline materials, contact with reactive materials (e.g., mild steel and aluminum) may produce flammable explosive hydrogen air mixtures. Do not mix with other classes of chemicals. Dilute only with water.

STORAGE AND DISPOSAL

Storage: Keep container closed when not in use.
Disposal: Do not contaminate water, food or feed by storage or disposal, or cleaning of equipment. In case of spill, flood area with large quantity of water washing to sewer or collection vessel. Wastes resulting from use of this product may be disposed of on site or at an approved waste facility. Do not reuse empty container. Triple rinse, puncture and dispose of container in a sanitary landfill.

EPA Registration No. 833-65
EPA Establishment No. 833-PA-1
Stock #4335
Net Contents: Gallons

AFCO LOW FOAM TOPS A LIQUID ACID SANITIZER CONCENTRATE

ACTIVE INGREDIENTS:	
Phosphoric Acid	30.00%
Sodium Salt of Sulfonated Oleic Acid	5.00%
INERT INGREDIENTS:	
TOTAL:	100%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

STATEMENT OF PRACTICAL TREATMENT: In case of skin contact, immediately flush with plenty of water for at least 15 minutes. Get medical attention if irritation persists. For eyes flush with plenty of water for 15 minutes and get medical attention. If swallowed, promptly drink large quantities of water. Avoid alcohol. Do not induce vomiting. Get medical attention.
NOTE TO PHYSICIAN: Probably mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL
FOR FURTHER PRECAUTIONARY STATEMENTS.

DIRECTIONS FOR USE:

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH LABELING FOR SANITIZING TANKS, PIPE LINES, PROCESSING EQUIPMENT IN DAIRY, BEVERAGE, MEAT AND POULTRY PROCESSING PLANTS.

- Clean equipment immediately after use
 - Preflush or prescrape and when necessary presoak with clean tepid water to remove gross food particles and soil
 - Wash thoroughly with recommended AFCO product
 - Rinse with clean tepid water.
 - Sanitize with a solution of AFCO LOW FOAM TOPS (½ oz. per gallon water 200 ppm) by circulation or immersion. Wet all surfaces thoroughly. Let solution remain in contact from 2-5 minutes and let drain completely and air dry. Do not rinse equipment with water after treatment. Fresh sanitizing solution should be prepared at least daily or more often if the solution becomes diluted or soiled. Sanitizing by spray or brush method use 1 oz. per 1 gallon.

Follow procedures recommended by local health authorities.

Use	Dilution Strength	ACCEPTED
		with COMMENTS in EPA Letter Dated:
½ oz.	200ppm active*	Sanitizing by immersion or circulation MAR - 5 1998

* PPM means parts of AFCO LOW FOAM TOPS per each million parts of water.
Sulfonated Oleic Acid per each million parts of water.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 833-65

Ferguson

PROPOSED PRODUCT LABELING

211

3/3