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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR - 2 2002

Mr. Dave Zmijewski  
Alex C. Fergusson, Inc  
25 Spring Mill Drive  
Frazer, Pa 19355 CA 906707

Subject: Repsonse to PR Notice 2001-1  
AFCO Low Foam Tops  
EPA Registration Number 833-65  
Application Dated February 15, 2002

Dear Mr. Zmijewski:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable.

**Proposed Amendment:**

- revised First Aid statement PR Notice 2001-1

**General Comments:**

1. In accordance with PR Notice 2001-1, the following statement must be added at the bottom of the first aid statement:  
  
"Have the product container or label with you when calling a Poison Control Center or Doctor or going for treatment."
2. The EPA encourages registrants to add the following information (telephone#) at the bottom of the first aid statement:

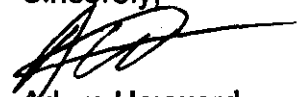
**CONCURRENCES**

SYMBOL								
SURNAME								
DATE								

A stamped copy of the accepted labeling is enclosed.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Drusilla Copeland at (703) 308-6224.

Sincerely,



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

Enclosure

**PRECAUTIONARY STATEMENTS**  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER**

Corrosive. Causes irreversible eye damage or skin burns. May be fatal if swallowed. Harmful if absorbed 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.

**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.

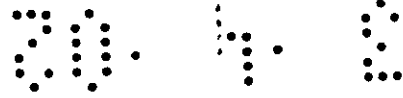
**PHYSICAL OR CHEMICAL HAZARDS**

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 cleaners or chemicals. Dilute only with water.

SEE SIDE PANEL FOR ADDITIONAL

**PRECAUTIONS**  
MANUFACTURED BY  
**ALEX C. FERGUSON, INC.**  
FRAZER, PENNSYLVANIA 19355  
Tel. (610) 647-3300

EPA Reg. No. 833-65  
EPA Est. No. 833-PA-1  
Net Contents 55 Gallons



**AFCO LOW FOAM TOPS**

**AFCO 4335**  
**A LIQUID ACID SANITIZER**  
**CONCENTRATE**

<b>ACTIVE INGREDIENTS:</b>	
Phosphoric Acid.....	30.00%
Sodium Salt of Sulfonated Oleic Acid	5.00%
<b>INERT INGREDIENTS.....</b>	<b>65.00%</b>
<b>TOTAL</b>	<b>100.00%</b>

**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 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 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 ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a Poison Control Center or doctor for treatment advice.

**NOTE TO PHYSICIAN:**  
Probable mucosal damage may contraindicate the use of gastric lavage.

**HMIS HAZARD RATING**

<b>HEALTH</b>	<input type="text" value="3"/>
<b>FLAMMABILITY</b>	<input type="text" value="0"/>
<b>REACTIVITY</b>	<input type="text" value="1"/>
<b>PERSONAL PROTECTION</b>	<input type="text" value="D"/>

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
APR - 2 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act, these wastes cannot be disposed of as hazardous waste. For more information, contact your State Agency, or the Hazardous Waste Management and Emergency Response (HWEM) Regional Office for guidance. Registered under EPA Reg. No. 833-65

It is a violation of Federal Law if this product is used in a manner inconsistent with its labeling. For sanitizing tanks, pipe linings, Beverage, Meat, and Poultry. 1. Clean equipment immediately. a. Preflush or prescrape with clean tepid water to remove residue. b. Wash thoroughly with water. c. Rinse with clean tepid water. d. Sanitize - with solution of 1 part concentrate to 100 parts per gallon water, 200 ppm. Wet all surfaces thoroughly for 2-5 minutes and then rinse equipment with clean sanitizing solution showing that the solution becomes clear. Follow procedures recommended on label. \*ppm means parts per million. Sodium Salt of Sulfonated Oleic Acid.

AFCO Low Foam Tops are registered under Sec.178.1010 for use on food contact surfaces and other food contact articles at a concentration of 100 parts per million of sulfonated oleic acid.

**STORAGE:** Keep container tightly closed.

**DISPOSAL:** Do not reuse or disposal, or cleaning of equipment. A large quantity of water wash resulting from use of this product should be sent to an approved waste facility. Do not puncture, and dispose of contents in accordance with local, state, and federal regulations.

Pesticide wastes are acutely toxic. These wastes cannot be disposed of as hazardous waste.

**CHEMTREC EMERGENCY CALL 800-424-9300**



**ALEX C. FERGUSON**  
25 SPRING MILL  
800-345-1329