

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

June 9, 2005

Henry Jacoby  
Regulatory Consultant for  
Alex C. Fergusson, Inc.  
6709 Ilex Court  
New Market, MD 21774

Subject: AFCO 4335 LF Tops Acid Sanitizer  
EPA Registration Number 833-75  
Application Date: May 16, 2005  
EPA Received Date: March 17, 2005

Dear Mr. Jacoby:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

**Proposed Notification**

- Revised labeling
- Additional Brand Name " AFCO 4335 Trugard 100"

**General Comments**

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable. A copy has been inserted in your file for future reference.

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

Sincerely,

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

**CONCURRENCES**

YMBOL	7510C							
JRNAME	Henry Jacoby							
DATE	6-9-05							

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**HENRY JACOBY  
REGULATORY CONSULTANT**

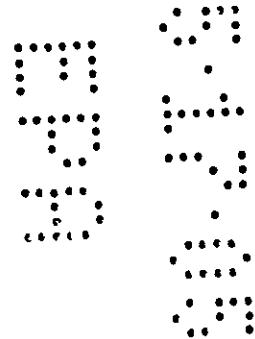
6709 ILEX COURT  
NEW MARKET, MD. 21774

PHONE: 301-865-9090  
FAX: 301-865-4333

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May 16, 2005

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1801 Bell Street  
Arlington, VA 22202



ATTN: Adam Heyward, PM34 (7510C)

Dear Mr. Heyward:

RE: NOTIFICATION AS PER PR NOTICE 98-10  
AFCO 4335 TOPS LF  
EPA Reg. No. 833-75

Alex C. Fergusson, Inc. has appointed Henry Jacoby to represent it as its agent before the Office of Pesticide Programs of EPA in regards to this registration. Please refer to the enclosed **March 22, 2004** letter of appointment signed by Dave Zmijewski, Chemist, Alex C. Fergusson, Inc.

Please forward all correspondence relative to this application to Henry Jacoby Regulatory Consultant, 6709 Ilex Court, New Market, MD 21774.

This resubmission transmits a notification for an additional brand name as per PR Notice 98-10. The additional brand name is **AFCO 4335 Trugard 100**. Also with this notification, the following label corrections are being made:

- 1) The dosage is being corrected to read 1 ounce per 4 gallons of water from the present 1 ounce per 5 gallons of water. The final printed labeling submitted incorrectly had 1 ounce per 5 gallons of water rather the acceptable 1 ounce per 4 gallons of water.

Office of Pesticide Programs  
U. S. Environmental Protection Agency  
Attn: Adam Heyward, PM34 (7510C)

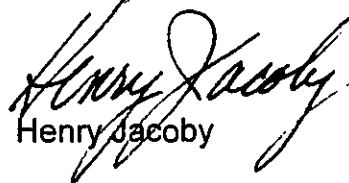
Notification  
AFCO 4335 TOPS LF  
EPA Reg. No. 833-75  
May 16, 2005

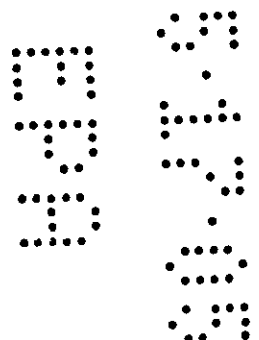
Page 2

- 2) The ppm for dodecylbenzene sulfonic acid and the total acidity is being adjusted to reflect 1 ounce of product per 4 gallons of water dilutions. This is consistent with the acceptable labeling.

If you have questions regarding this application for registration, please contact me at (301) 865-9090.

Sincerely,

  
Henry Jacoby



cc: N. Schiff  
D. Zmijewski



United States  
 Environmental Protection Agency  
 Washington DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

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**Application for Pesticide - Section I**

1. Company/Product Number 833-75	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
1. Company/Product (Name) AFCO 4335 LF TOPS	PM# PM #34	
5. Name and Address of Applicant (Include ZIP Code) Alex C. Fergusson, Inc 5000 Letterkenny Road Chambersburg, PA 17201 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of additional brand name per PR Notice 98-10. The additional brand name is "AFCO 4335 Trugard 100." Correction of doses sanitizing to 1 ounce per 4 gallons of water (the accepted dosage).  
 The notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 55 Gal or 275 Gal Tote		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Other _____		
			<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Henry Jacoby	Title Agent	Telephone No. (Include Area Code) 301-865-9090
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received  (Stamped)
2. Signature 	3. Title Consultant/Agent	
4. Typed Name Henry Jacoby	5. Date May 16, 2005	

# AFCO 4335 TRUGARD 100 ACID SANITIZER

### FOR INDUSTRIAL USE ONLY

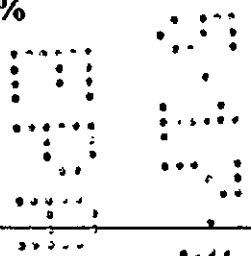
For Food Processing Equipment in dairy farms, dairy and food processing plants, food service industry, meat and poultry plants and carbonated beverage industry. The effectiveness of this product was tested against *Escherichia coli* (ATCC #11229) and *Staphylococcus aureus* (ATCC #6538).

### ACTIVE INGREDIENTS:

- Phosphoric Acid.....56.25%
- Dodecylbenzene Sulfonic Acid.....3.50%
- OTHER INGREDIENTS.....40.25%
- 100.00%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**



### FIRST AID

<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>•Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"> <li>•Take off contaminated clothing.</li> <li>•Rinse skin immediately with plenty of water for 15 – 20 minutes.</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>•Call poison control center or doctor immediately for treatment advice.</li> <li>•Have person sip a glass of water if able to swallow.</li> <li>•Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>•Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF INHALED</b>	<ul style="list-style-type: none"> <li>•Move person to fresh air.</li> <li>•If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the product label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.</p>	
<b>NOTE TO PHYSICIAN</b>	
<p>Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

### HMIS HAZARD RATING

<b>HEALTH</b>	<b>3</b>
<b>FLAMMABILITY</b>	<b>0</b>
<b>REACTIVITY</b>	<b>1</b>
<b>PERSONAL PROTECTION</b>	<b>D</b>

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

**FOR USE ON FOOD CONTACT SURFACES IN DAIRY FARMS, DAIRY AND FOOD PROCESSING PLANTS, FOOD SERVICE INDUSTRY, MEAT AND POULTRY PLANTS AND CARBONATED BEVERAGE INDUSTRY:**

Dairy Farms - For cleaning bulk tanks, utensils, cans, separators, strainers, pails, and milking machines.  
Dairy and Food Processing Plants - For cleaning transport tank trucks, storage tanks, and other equipment.

Food Service Industry - For cleaning food serving equipment glasses, dishes, utensils, pots, and pans.

Meat and Poultry Plants - For cleaning all meat and poultry contact surfaces such as belts, cutting tables and other utensils and equipment.

**CLEANING AND BRIGHTENING:** Preflush equipment with water. Use 1 ounce of AFCO 4335 Trugard 100 per 3 gallons of water for immersion and brush cleaning of lightly soiled food contact and utensils and follow by a potable water rinse to remove food soils.

To clean and brighten central recirculation systems preflush with water. Circulate 1 ounce of AFCO 4335 Trugard 100 per 3 gallons of water through system for 1 minute or longer. Drain and rinse with potable water to remove food soils. Two ounces of AFCO 4335 Trugard 100 per 3 gallons of water is effective for high-pressure spray cleaning using a coarse droplet. Follow with potable water to remove food soils and chemical spray.

**FOR FINAL SANITIZING RINSING:** Prior to use of this product, remove gross food particles and soil by pre-flush or pre-scrape and, when necessary pre-soak treatment, from all surfaces. Then wash with recommended alkaline AFCO Cleaner followed by a thorough potable water rinse. To sanitize, rinse with a solution of 1 ounce of AFCO 4335 Trugard 100 per 4 gallons water. This can be done by flushing, immersion, and circulation or by spray operations. Surface should remain wet for at least 60 seconds. Allow adequate draining before contact with food.

**Note for manual operations:** Fresh sanitizing solution must be prepared at least daily, prepare more often if the solution becomes diluted or soiled.

**Note for mechanical operations:** Solution used in spray operations may not be re-used for sanitizing. Only 1 sanitization per solution is allowed. The solution may be used for cleaning or other purposes if not soiled.

**FOR USE IN CARBONATED BEVERAGE INDUSTRY -** For cleaning pre-mix and post-mix vending machines, plant equipment. Sanitize pre-cleaned surfaces with 1 ounce per 4 gallons of water. Surface should remain wet for at least 60 seconds. Drain sanitizing solution

One (1) ounce per 4 gallons solutions of AFCO 4335 Trugard 100 contains 68 ppm of dodecylbenzene sulfonic acid and a total acidity of 1099 ppm expressed as H<sub>3</sub>PO<sub>4</sub>.

This product averages 17.79% phosphorous in the form of phosphates, which is equivalent to 7.06 grams of phosphorous per fluid ounce of product.

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### DANGER

Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing spray mist. Do not get in eyes, on skin or on clothing. Wear protective eyewear such as goggles or face shield (safety glasses). Wear protective clothing (long-sleeve shirt and long pants, socks plus, chemical resistant footwear and gloves such as water proof gloves). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before use

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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 you State Water Board or Regional Office of the EPA.

### PHYSICAL AND 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.

STORAGE AND DISPOSAL
Do not contaminate water, food, or feed by storage and disposal
<b>PESTICIDE STORAGE:</b> Store in original container away from heat or open in an area inaccessible to children. Do not reuse empty container.
<b>PESTICIDE DISPOSAL:</b> Pesticide wastes are acutely hazardous. Improper disposal of all excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label directions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.
<b>CONTAINER DISPOSAL:</b> Plastic Drum: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**MANUFACTURED BY  
ALEX C. FERGUSON, INC.  
5000 Letterkenny Road  
Chambersburg, PA 17201  
TEL. (717) 264-9194**

**EPA Reg. No. 833-75  
EPA Est. No. 833-PA-2  
Net Contents: 55 Gallons**