

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 11 1990

Donald F. Garvin
Diversey Wyandotte Corporation
1532 Biddle Avenue
Wyandotte, MI 48192

Subject: UDDER-BAC®
EPA Registration No. 875-46
Your Submission Dated April 27, 1990

Dear Dr. Garvin:

This is in response to your application to add an additional use -- flush cleaning and sanitizing of milking clusters.

The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy of the labeling is enclosed for your records. Five copies of the finished labeling must be submitted before the product is released for shipment.

1. On the label, in the Statement of Practical Treatment, under "If Swallowed," delete "a large quantity of egg whites or gelatin solution, or if not available."

2. In the Storage and Disposal section of the label, add the following pesticide disposal text (in accordance with PR Notice 83-3):

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, 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 EPA Regional Office for guidance.

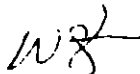
CONCURRENCES

SYMBOL							
SURNAME							
DATE							

24
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If you have any questions, you may call Wallace Powell at
(703) 557-6938.

Sincerely,



Walter C. Francis
Acting Product Manager (32)
Antimicrobial Program Branch
Registration Division (H-7504C)

Enclosure

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

**DANGER: CORROSIVE.
HARMFUL OR FATAL IF SWALLOWED.**

Causes eye damage and skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS — This pesticide is toxic to fish. Do not discharge into lakes, streams, ponds or public waters unless in accordance with NPDES permit. For guidance, contact the regional office of the Environmental Protection Agency.

CHEMICAL AND PHYSICAL HAZARDS

DANGER — MUST BE DILUTED BEFORE USE — ACIDIC PRODUCT — Do not mix with other cleaners or chemicals as hazardous gases or heat may be generated. Dilute only with water.

STORAGE AND DISPOSAL

Store this product in a cool, dry area, away from sunlight and heat to avoid deterioration. In case of spill, flood area with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not contaminate food or feed by storage disposal or cleaning of equipment.

CONTAINER DISPOSAL (Plastic Containers)

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

121410(887)
FIG-6-B

Udder-Bac®

Udder Wash

**Iodophor Udder Wash,
Bactericide Cleaner-Sanitizer**

For Dairy Farm or Industry Use Only

ACTIVE INGREDIENTS

Iodine * 1
INERT INGREDIENTS 98
100

*From Polyethylene glycolether of linear secondary alcohol-iodine complex.

KEEP OUT OF REACH OF CHILDREN.

**DANGER: CORROSIVE.
HARMFUL OR FATAL IF SWALLOWED.**

STATEMENT OF PRACTICAL TREATMENT

Eyes: Flush eyes with plenty of water for 15 minutes. Get prompt medical attention.

Skin: Flush skin with water. Wash thoroughly with soap and water.

If Swallowed: Drink promptly a large quantity of egg whites or gelatin solution, or if not available, a large quantity of water. DO NOT induce vomiting. Avoid alcohol.

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

See side panels for additional Precautions and Directions for Use.

BEST AVAILABLE COPY

UDDER BAC®

Iodophor Sanitizer

For Industry Use Only

Precautionary Statements.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

**DANGER: CORROSIVE.
HARMFUL OR FATAL IF SWALLOWED.**

Causes eye damage and skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge into lakes, streams, ponds or public waters unless in accordance with NPDES permit. For guidance, contact the regional office of the Environmental Protection Agency.

CHEMICAL AND PHYSICAL HAZARDS

ACIDIC PRODUCT: Do not mix with other cleaners or chemicals as hazardous gases or heat may be generated. Dilute only with water.

DANGER — MUST BE DILUTED BEFORE USE

STORAGE AND DISPOSAL

Store this product in a cool, dry area, away from sunlight and heat to avoid deterioration. In case of spill, flood area with large quantities of water. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or residue is a violation of federal law. If these wastes cannot be disposed of by you according to label instructions, contact your State Pesticide or Environmental Control Agency or the hazardous waste representative at the nearest EPA regional office for guidance.

CONTAINER DISPOSAL (Plastic Containers): Triple-rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

(890910)
FIG. 6-B

BEST AVAILABLE COPY

ACTIVE INGREDIENTS

Iodine*	1.75%
INERT INGREDIENTS	98.25%
	100.00%

*From Polyethylene glycol ether of methyl secondary alcohol iodine complex

KEEP OUT OF REACH OF CHILDREN.

**DANGER: CORROSIVE.
HARMFUL OR FATAL IF SWALLOWED.**

STATEMENT OF PRACTICAL TREATMENT:

Eyes: Flush eyes with plenty of water for 15 minutes. Get prompt medical attention.

Skin: Flush skin with water. Wash thoroughly with soap and water.

If Swallowed: Drink promptly a large quantity of water. DO NOT induce vomiting. Avoid alcohol.

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

See side panels for additional Precautions and Directions for Use.

NOT REVIEWED

**In Accordance with PR Notice 82-24
Based on Draft Labeling Dated**

NET CONTENTS 5 GALLONS (18.95 LITERS)

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

Udder Washing — Before Milking

- About one minute before attaching milker, wash udder using 1 oz. of Udder Bac in 5 gallons of lukewarm water (25 ppm titratable iodine solution). Wash and massage entire udder thoroughly.
- Dry udder with a single service towel. Do not reuse towel or wring it out in the solution. Yellow color indicates the presence of titratable iodine. Prepare a fresh solution when the yellow color fades or when the solution becomes visibly dirty.
- AFTER MILKING,** dip each teat with and approved teat dip.

Sanitizing of Manually Cleaned Equipment — Tanks, Vats, Utensils, Brushes, and Food Processing Equipment

- Rinse with warm water immediately after use.
- Wash with recommended Diversey product.
- Rinse with clean water. Drain equipment.
- Sanitize cleaned surfaces by spraying or immersion to wet all surfaces completely in a solution prepared by diluting 1 ounce of Udder Bac to each 5 gallons of water. This solution provides 25 ppm of titratable iodine. Utensils and equipment shall be immersed for a period of 2 minutes.
- Drain equipment of sanitizer. Allow to air dry. Protect from dust and dirt until used.

NOTE: Udder Bac sanitizer will decrease in activity as used. Test solution with an Iodine Test Kit. Discard solution when the titratable iodine content decreases to 12.5 ppm titratable iodine or becomes visibly dirty. Do not reuse sanitizer applied by spray or circulation methods.

FLUSH CLEANING AND SANITIZING OF MILK CLUSTERS

- Disengage milk hose with collection line.
- Attach milk hose to control cleaning/sanitizing line. Activate valve and flush milk hose, cluster and claw with a solution containing 1 oz. of UDDER-BAC in 5 gallons of warm water (providing 25 ppm of titratable iodine). Allow flush to run until solution is clear.
- Allow milking hose and equipment to drain thoroughly before milking the next cow.
- At the completion of milking, clean and sanitize equipment by assembling and processing as for other equipment and utensils.

EPA Est. 875-CA-214; 875-PA-115
875-MI-116; 875-GA-112; 875-WI-113
Bracketed number is first digit of lot number.