06/19/2002

JUN 19 2002

Mr. Terry Sabatelli Regulatory Specialist DiverseyLever 3630 E. Kemper RD Cincinnati, OH 45241

Subject:

Revised Labeling

Demand

EPA Registration Number 875-100 Application Dated May 16, 2002

Dear Mr. Sabatelli:

The following amendments, submitted in connection with registration under section of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with comments:

# **Proposed Amendment:**

- revised First Aid statement PR Notice 2001-1
- revised Storage and Disposal PR Notice 83-3
- revised the wording of the Direction For Use

#### **General Comments:**

#### Delete the statement:

This product contains only biodegradable surfactants and will not create foam problems in sewage systems, rivers or stream"

SURNAME SURNAME	
SURNAME	
DATE	

Printed on Recycled Paper

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

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

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Sincerely,

Adam Heyward

Product Manager (34)

Regulatory Management Branch II Antimicrobials Division (7510C)

**Enclosure** 



#### Demand

Low Foaming Anionic Acid Sanitizer (product reviewer- this is only a product descriptor, not part of the product name)

## For Industry and Dairy Farm Use

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ACTIVE INGREDIENT:	
Phosphoric acid	59.8%
INERT INGREDIENTS:	
Total: '	100.0%

# KEEP OUT OF REACH OF CHILDREN DANGER

ACCEPTED with COMMENTS IN EPA Letter Dated:

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

JUN 19 2002
Under the Federal Insecticide,
Plungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No 875-16

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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 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 use.

#### **FIRST AID**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**IF SWALLOWED:** Call 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

**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 eye. Call a poison control center or doctor for treatment advice. **IF ON SKIN OR CLOTHING:** 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 INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

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

**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 Systems(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.

#### PHYSICAL AND CHEMICAL HAZARDS

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

#### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Open dumping is prohibited. Store in original container in areas inaccessible to children. Do not reuse empty container.

**PESTICIDE DISPOSAL:** 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.

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

This product contains only biodegradable surfactants and will not create foam problems in sewage systems, rivers or streams. Phosphorous as (P), 18.4%. Recommended use solution (1 fl. oz. gal.) contains 1.9 grams of phosphorous (as P) per gallon.

#### DIRECTIONS FOR USE

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

Demand is recommended for on pre-cleaned food contact surfaces such as food process equipment, pipelines, tanks, vats, fillers, evaporators, and pasteurizers in dairies, breweries, beverage, and other food processing facilities. This product is an effective sanitizer when the sanitizing solution is prepared in water up to 500 ppm hardness calculated as CaCO<sub>3</sub>.

#### SANITIZING FOOD CONTACT SURFACES

- 1. Remove gross food particles by flushing with water or scraping.
- 2. Wash with a detergent solution.
- 3. Rinse with potable water.

- 4. Sanitize with a concentration of 1 fluid ounce of Demand per 4 gallons of water (1:512 dilution) by immersion, coarse spray or circulation.
- 5. Allow sanitizer solution to contact surfaces for at least 1 minute.
- 6. Drain thoroughly. Do not rinse.

## **CIRCULATION SANITIZING (CIP)**

Remove gross food particles by flushing with water, then wash with a detergent solution. Prepare a sufficient volume of sanitizing solution by diluting 1 fluid ounce of Demand per 4 gallons of water (1:512) to fill the system. Pump sanitizer through the equipment, valves, and lines to obtain full return flow that is free of air. Circulate to insure that all surfaces are wet for at least 1 minute. Drain and/or air blow system to remove sanitizer.

Prepare fresh sanitizer solution daily. If solution becomes visibly soiled or falls below strength when tested with a Demand Test Kit, discard and prepare additional sanitizer.

Sprayed or circulated sanitizer solutions may not be reused for sanitizing.

EPA Reg. No. 875-100

EPA Est. No. 875-OH-1[50]; 875-PA-1[80]; 875-CA-4[MD]; 875-WI-1[10]; 10508-

TX-1[12]; 9365-FL-1[21]

Bracketed numbers/letters are the first numbers/letters of the batch number.

Net Contents: 208 L (55 US gal) 4X3.78 L (1 US gal) 1249 L (330 US gal) 114 L (30 gal) Bulk

DiverseyLever 3630 E. Kemper Rd. Cincinnati, OH 45241 800 233 1000

24 Hr EMERGENCY TELEPHONE:

Medical: (Call Collect) 303 592 1024

Transportation: (CHEMTREC) 800 424 9300