

875-100



2/10/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

FEB 10 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Kresti A. Lyddon
Sr. Registration Specialist
JohnsonDiversey, Inc.
8310 16th Street
P.O. Box 902
Sturtevant, WI 53177-0902

Subject: **Demand**
EPA Registration No. 875-100
Application Date: November 7, 2008
Receipt Date: November 12, 2008

Dear Ms. Lyddon:

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

Proposed Amendments

- Revised Labeling per PR Notice 2007-4

General Comment

A stamped copy of the accepted labeling is enclosed.

Thank you for submitting this amendment as an electronic application. Please continue to submit your application(s) electronically. Refer to the following website for guidance on electronic submissions and label:
<http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm>. If you have questions concerning electronic labeling, a list of contacts is available at the above website.

Should you have any questions or comments concerning this letter, please contact me by telephone at (703) 308-8583 or email address at: mitchell.emily@epa.gov, or Renae Whitaker by telephone at (703) 308-7003 or email address at: whitaker.renae@epa.gov during the hours of 8:00 am to 3:30 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely yours,



Emily Mitchell
(Acting) Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: EPA stamped labeling

3/4

Note to Agency: Text appearing in parenthesis or brackets is done to show optional text.

JohnsonDiversey



**Demand
Low Foaming Anionic Acid Sanitizer**

For Institutional (and) (Dairy Farm) Use (Only)

ACTIVE INGREDIENTS:	
Phosphoric acid.....	59.8%
INERT (OTHER) INGREDIENTS:	40.2%
TOTAL:	100.0%

**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 the first 5 minutes, then continue rinsing eye.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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 the 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 an ambulance, then give artificial respiration preferably mouth-to-mouth if possible.

IN CASE OF EMERGENCY, CALL A POISON CONTROL CENTER OR DOCTOR FOR TREATMENT ADVICE.

1-800-851-7145

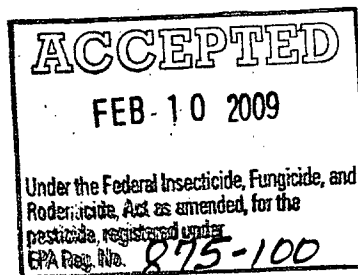
Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.

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

See additional precautionary statements on back (side) (left) (right) (panel) (of) (label) (below).

Net Contents:

(Product of USA)



January 26, 2009
Page 1 of 4
EPA Reg. No. 875-100

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(MARKETING CLAIMS:)

(FEATURES, CLAIMS & USES:)

Demand is recommended for use 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 in an effective sanitizer with the sanitizing solution is prepared in water up to 500 ppm hardness calculated as CaCO₃.

DIRECTIONS FOR USE:

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

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) 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.

STORAGE AND DISPOSAL

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

Note to Agency: Text appearing in parenthesis or brackets is done to show optional text.

CONTAINER DISPOSAL *Note to reviewer – One or more of the following paragraphs for Container Disposal will be selected, depending on packaging type:*

(If not being refilled with this product,) 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.

NONREFILLABLE SEALED CONTAINERS: *Note to EPA: Several of our packaging options (including ACCUMIX Containers™, Solutions Center™, J-Fill™, OUTPOST™, Single Solutions™, Smart Dose, Command Center™, or RTD™) are sealed containers or bottles designed to reduce worker exposure to the concentrate. None of these can be triple rinsed because they are closed, sonically welded, sealed containers. The following text will be used on these sealed container types:*

Nonrefillable container. Do not reuse or refill this container. Wrap empty container and put in trash.

NONREFILLABLE NON-RIGID CONTAINERS: *Note to EPA: Several of our packaging options are Bag-in-Box containers (a plastic bag liner supported inside a box) or are flexible bag-type containers (such as ACCUPACK™ Containers). These flexible containers are exempt from the triple rinsing requirements. The following text will be used on these container types:*

Nonrefillable container. Do not reuse or refill this container. Wrap empty container and put in trash.

SMALL NONREFILLABLE CONTAINERS: *Note to EPA: The following text will be used on rigid, nonrefillable containers small enough to shake (5 gallons or smaller):*

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer container for recycling, if available.

LARGE NONREFILLABLE CONTAINERS: *Note to EPA: One of the following paragraphs will be used on labels for rigid, nonrefillable containers too large to shake (larger than 5 gallons):*

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for at least 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer container for reconditioning, if appropriate.

OR

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or a mix tank or collect rinsate for later use or disposal. Insert pressure-rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for reconditioning, if appropriate.

REFILLABLE CONTAINERS: *Note to EPA: One of the following paragraphs will be used on labels for refillable containers:*

Refillable container. Refill this container with (this brand or brand name) pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

OR

Pressure rinsing the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container prior to final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

ENVIRONMENTAL HAZARDS *(for containers of 5 gallons or more)*

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 agency 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.

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Wear chemical splash-proof goggles or face shield, rubber gloves and protective clothing. Wash hands thoroughly with soap and water before eating, drinking, chewing gum, using tobacco or using the toilet and after handling product. Remove contaminated clothing and wash before reuse. Do not apply this product in a way that will contact workers or other persons directly.

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.

PELIGRO

Si no puede leer en ingles, pregunte a su supervisor sobre las instrucciones de uso apropiadas antes de trabajar con este producto.

EPA Reg. No. 875-100

EPA Est. No.

(Lot code letters indicate establishment number.)

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