



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JUN 17 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Kresti A. Lyddon
Senior Registration Specialist
Johnson Diversey, Inc.
8310 16th Street, MS 707
Sturtevant, WI. 53177

RE: Label amendment dated March 19, 2010
Product Name: CL-9 Sanitizer
EPA Registration Number: 875-192

Dear Ms. Lyddon:

The Agency has reviewed your application for amendment submitted in accordance with continuing registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the action acceptable with the following comments:

- Above the ingredient statement, delete the word "only" from For Industrial and (Institutional) Use.
- In the Environmental Hazards section, change "other waters" to "other public waters".
- In the Precautionary Statements section, add "...before eating, drinking, chewing gum, using tobacco, or using the toilet to end of "wash thoroughly with soap and water after handling".

In summary, your request to revise the Storage and Disposal directions in accordance with PR Notice 2007-4. Please submit revised final labeling to this Office for the file. If you have questions concerning this letter, please contact Tom Luminello at (703) 308-8075, or by e-mail at luminello.tom@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Wanda Y. Henson".

Wanda Y. Henson
Acting Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510-P)

(Note to Agency: Text appearing in parentheses is done to show optional text.)

JohnsonDiversey



CL-9 SANITIZER Liquid Chlorinated Sanitizer

Makes Clear Solution in up to (30 grain) (or 400 ppm (as CaCO₃)) hard water • Sanitizer

For Industry (Institutional) Use ~~(Only)~~
NOT SOLD FOR RESIDENTIAL USE

ACTIVE INGREDIENT:	
Sodium dichloro-s-triazinetrione dihydrate	20.0%
INERT (OTHER) INGREDIENTS:	80.0%
TOTAL:	100.0%

Available Chlorine 9.0%

**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 a 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 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-XXX-XXX-XXXX**

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 the use of gastric lavage.

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

(See reference sheet (enclosed in case) for additional directions for use.)

Net Contents:

ACCEPTED
with COMMENTS (Made in XXXXXXXXXX)
EPA Letter Dated:

JUN 17 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

875-192

(Note to Agency: Text appearing in parenthesis is done to show optional text.)

Recommended for use in sanitizing operations, food plants, dairies, restaurants, beverage and brewery operations.

DIRECTIONS FOR USE:

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

Concentration Chart

<u>Available Chlorine</u>	<u>Dilution Rate</u>
50 ppm	3/4 oz. to 10 gallons
100 ppm	1.5 oz. to 10 gallons

FOR SANITIZING UTENSILS, DISHES AND GLASSES IN HAND WASH OPERATIONS:

1. Pre-flush or pre-scrape utensils, dishes and glasses to remove gross food particles. Pre-soak if necessary.
2. Wash thoroughly with a recommended detergent.
3. Rinse with clean (potable) water.
4. Sanitize in a solution containing 100 ppm available chlorine (1.5 oz. per 10 gallons of water). Immerse all utensils, dishes and glasses for at least 2 minutes.
5. Place sanitized utensils on a rack or drainboard to air dry.

Note: NO POTABLE WATER RINSING is required. Prepare a fresh solution daily or more frequently if soil is apparent.

FOR SANITIZING UTENSILS AND EQUIPMENT IN CIRCULATION SYSTEMS, ONE-THROUGH OVERFLOW SYSTEMS OR BY SPRAYING:

1. Pre-flush system to remove gross food particles.
2. Wash system thoroughly with a recommended detergent.
3. Rinse system with clean (potable) water.
4. Sanitize in a solution containing of 100 ppm available chlorine (1.5 oz. per 10 gallons of water). CIRCULATE through system, FLUSH through system or SPRAY over all surfaces of system. Allow at least 2 minutes contact time with sanitizing solution.

Use solutions for circulating systems, once-through overflow systems or spray operations may not be re-used for sanitizing. Only one sanitization per solution is allowed. The solution may be used for cleaning or other purposes if it is not soiled.

EGG SANITIZING:

To sanitize clean shell eggs intended for food or food products, spray with a solution of 1.5 oz. of product in 10 gallons of water (providing 100 ppm available chlorine). The solution must be equal to or warmer than the eggs, but not to exceed 130° F. Wet eggs thoroughly and allow to drain. Eggs that have been sanitized with this chlorine compound may be broken for use in the manufacture of egg products without a prior potable water rinse. Eggs must be reasonably dry before casing or breaking. The solution must not be reused for sanitizing eggs.

MICROBIOLOGICAL DATA:

Method: Chlorine (Available) in Disinfectants, Germicidal Equivalent Concentration. A.O.A.C. 14th Edition, 1984, pgs. 68-69.

Results: This product at 100 ppm available chlorine (1.5 oz/10 gallons of water) is more than equivalent to 100 ppm of available chlorine derived from sodium hypochlorite. The organisms used in this test were *Salmonella typhosa* (ATCC 6539), *Staphylococcus aureus* (ATCC 6538) and *Listeria monocytogenes* (ATCC 15313).

Letter Dated:

JUN 17 2010

4/5

(Note to Agency: Text appearing in parenthesis is done to show optional text.)

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store this product in a cool dry area. Keep lid closed to prevent loss of strength.

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.

CONTAINER DISPOSAL:

NONREFILLABLE NON-RIGID CONTAINERS: *Note to reviewer: Several of our packaging options are Bag-in-Box containers (a plastic bag liner supported inside a box or drum) or are flexible pouch containers. These flexible containers are exempt from the triple rinsing requirements. We will use the following text on these container types:*

Nonrefillable container. Do not reuse or refill this container. Completely empty (liner) (pouch) by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of (liner) (pouch) in a sanitary landfill or by incineration if allowed by State and local authorities. (Offer drum for recycling or reconditioning if available.) (Wrap empty pouch and put in trash.)

LARGE NONREFILLABLE CONTAINERS: *Note to reviewer: We will select one of the following paragraphs for labels of large, nonrefillable containers that can be rinsed (for example, a 55-gallon plastic drum) (larger than 5 gallons):*

Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. 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 for reconditioning, if appropriate.

OR

Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. 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.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 17 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

875-192

(Note to Agency: Text appearing in parentheses is done to show optional text.)

REFILLABLE CONTAINERS: Note to reviewer: 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 product 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 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. Causes skin irritation. Harmful if swallowed, inhaled 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 when handling this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PHYSICAL OR CHEMICAL HAZARDS

Do not mix with acidic chemicals.

and before eating, drinking, chewing gum, using tobacco, or using the toilet.

EPA Reg. No. 875-192
EPA Est. No.
(Lot code letters indicate manufacturing location.)

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ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 17 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

875-192