

May 8, 2002

Kim Davis, CC, APC
RegWest Company
30856 Rocky Road
Greeley, CO 80631-9375

Subject: Westfalia-Surge, Inc.
Zinicin
EPA Registration No. 1072-5
Notification Per PR Notice 98-10

Dear Ms. Davis:

This will acknowledge receipt of your notification of to make the labeling changes listed below, submitted under provisions of FIFRA Section 3(c)9. Based on a review of the submitted material the following comments apply.

Labeling Changes

1. Add the "Note to Physician" statement
2. Revised "Precautionary" statements per the Sodium Hypochlorite Standard.
3. Deletion of the duplicate "Ingredient" statement.
4. Separation of the company name from the product name.
5. Reference to MSDS in the Hazards section.
6. Add the Spanish translation

The changes are acceptable and have been made a part of the file for this product.

CONCURRENCES							
SYMBOL	75700						
SURNAME	M. H. ...						
DATE	5-8-02						

Please note that final printed labels will only be approved for labels that have been stamped accepted or accepted with the revised comments.

Sincerely,

*Wanda Y. Mitchell
Product Reviewer - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)*

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060.

United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section I

1. Company/Product Number EPA Reg. No. 1072-5	2. EPA Product Manager Robert Brennis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) Zinicin™	PM # 32	
5. Name and Address of Applicant (Include ZIP Code) Westfalia-Surge, Inc. c/o RegWest Company 30856 Rocky Road Greeley, CO 80631-9375 <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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 06/12/01 <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
Submit final printed labeling and label revision notification per PR Notice 98-10.

This 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 the 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 sections 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			
*Certification must be submitted		If "Yes" Unit Packaging Wgt.	No. Per Container	If "Yes" Packaging Wgt.	No. Per Container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input type="checkbox"/> Paper glued <input type="checkbox"/> Other _____					

Section - IV

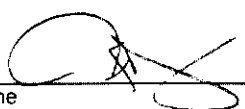
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).

Name Kim Davis, CC, APC	Title Consultant/Agent	Telephone No. (Include Area Code) (970) 353-0611
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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 Kim Davis, CC, APC	5. Date April 4, 2002

Westfalia Surge

ZINICIN™

Westfalia {logo} Surge {logo}

Chlorinated Sanitizer

See accompanying label for directions, precautionary and first aid information

Keep Out of Reach of Children
DANGER

Active Ingredient:	
Sodium Hypochlorite	12.5%
Other Ingredients	87.5%
Total	100.0%

Westfalia•Surge, Inc.
1880 Country Farm Drive
Naperville, IL 60563 U.S.A.
www.westfaliasurge.com

[Code] [(Rev. ____)]

Net Contents: __ U.S. GAL. (__ L)

[UPC]

{Accompanying Label}

ZINICIN™

EPA Reg. No. 1072-5
EPA Est. 1072-IL-1

**KEEP OUT OF REACH OF CHILDREN
DANGER**

**PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals**

DANGER: Corrosive, may cause severe skin and eye irritation or chemical burns to broken skin. Causes eye damage. Wear safety glasses or goggles and rubber gloves when handling this product. Wash after handling. Avoid breathing vapors. Vacate poorly ventilated areas as soon as possible. Do not return until odors have dissipated. Refer to Material Safety Data Sheet (MSDS).

First Aid

If in Eyes:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If Swallowed:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Immediately drink large quantities of milk if available; otherwise drink large quantities of water. • 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-451-8346 for emergency medical treatment information.

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

{Note: The first aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

Physical or Chemical Hazards

Strong oxidizing agent. Mix only with water according to label directions. Mixing this product with chemicals (e.g. ammonia, acids, detergents, etc.) or organic matter (e.g. urine, feces, etc.) will release chlorine gas which is irritating to eyes, lungs and mucous membranes.

Environmental Hazards

This pesticide 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 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.

State and Local Regulations

Consult your dealer, state or local health authorities for additional information.

TABLE OF PROPORTIONS – AVAILABLE CHLORINE

100 ppm – 1 fluid oz. (30 ml) in 10 gallons (38 liters) water
200 ppm – 2 fluid oz. (60 ml) in 10 gallons (38 liters) water
600 ppm – 6 fluid oz. (180 ml) in 10 gallons (38 liters) water

DIRECTIONS FOR USE

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

Storage and Disposal

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

Storage: Store in a cool, dry area, away from direct sunlight and heat to avoid deterioration. Keep from freezing. If frozen, separation may occur. Completely thaw and mix well prior to use. In case of spill, flood area with large quantities of water. **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:** 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.

Degrades with age. Use a test kit and increase dosage as necessary to obtain required level of available chlorine.

Sanitization of Nonporous Food Contact Surfaces: Rinse/Immersion Method: Use a solution of 100 ppm available chlorine in the sanitizing solution if a chlorine test kit is available. Solutions containing an initial concentration of 100 ppm available chlorine must be tested and adjusted periodically to ensure that the available chlorine does not drop below 50 ppm. Prepare a 100 ppm sanitizing solution by thoroughly mixing 1 oz. of this product with 10 gallons of water. If no test kit is available, prepare a sanitizing solution by thoroughly mixing 2 oz. of this product with 10 gallons of water to provide approximately 200 ppm available chlorine by weight.

Clean equipment surfaces in the normal manner. Prior to use, thoroughly rinse or immerse all surfaces with the sanitizing solution, maintaining contact with the sanitizer for at least 2 minutes and allow the sanitizer to drain. If solution contains less than 50 ppm available chlorine, as determined by a suitable test kit, either discard the solution or add sufficient product to reestablish a 200 ppm residual. Do not rinse equipment with water after treatment and do not soak equipment overnight. Sanitizers used in automated systems may be used for general cleaning but may not be reused for sanitizing purposes.

Sanitization of Porous Food Contact Surfaces: Rinse Method: Prepare a 600 ppm solution by thoroughly mixing 6 oz. of this product with 10 gallons of water. Clean all surfaces in the normal manner. Thoroughly rinse/immerse all surfaces with the 600 ppm solution, maintaining contact for at least 2 minutes. Prior to using equipment, rinse/immerse all surfaces with a 200 ppm available chlorine solution. Do not rinse with water after treatment and do not soak equipment overnight.

Agricultural Uses: Food Egg Sanitization: Thoroughly clean all eggs. Thoroughly mix 2 oz. of this product with 10 gallons of water to produce a 200 ppm available chlorine solution. Do not allow the sanitizer temperature to exceed 130°F. Spray the warm sanitizer so that the eggs are thoroughly wetted. Allow the eggs to thoroughly dry before casing or breaking. Do not apply a potable water rinse. Do not reuse the solution to sanitize eggs.

ONLY FOR FARM, COMMERCIAL & INDUSTRIAL USE.

ZINICIN is a Trademark of Westfalia•Surge, Inc.

Made in U.S.A.

[] Denotes alternate language

{ } Denotes language not appearing on market label