

4959-13

1-4-2001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1/3

JAN - 4 2001

West Agro, Inc.
501 Santa Fe
Kansas City, MO 64105

Attention: Dollie Howser
Regulatory Specialist

Subject: Clean Front Concentrate
EPA Registration Number 4959-13
Your Amendment Dated November 15, 2000

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to revise your label per PR Notice 2000-3 will be acceptable provided that you make the labeling changes listed below before you release this product for shipment bearing the amended label.

1. Under the "First Aid Statement" revise the "If Swallowed" to read:
 - o Call poison control center or doctor immediately for treatment advice.
 - o Have person sip a glass of water if able to swallow.
 - o Do not induce vomiting unless told to do so by the poison control center or doctor.
 - o Do not give anything by mouth to an unconscious person.
2. For Toxicity Category I eye and skin irritants, use the following "Note to Physician".

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

A stamped copy is enclosed for your records. Submit one copy of the final printed label before you release the product for shipment bearing the amended label.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

If you have any questions concerning this letter, please contact Delores Williams at (703) 308-6372.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Brennis', written in a cursive style.

Robert S. Brennis
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510C)

KEEP OUT OF REACH
OF CHILDREN

▲ DANGER

Iodine, the Element of Confidence™

0544

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through 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 reuse.

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. Call a Poison Control Center or doctor for treatment advice.

IF ON SKIN: 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 SWALLOWED: Call a Poison Control Center or doctor for treatment advice. Do not induce vomiting. Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

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. Call a Poison Control Center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsions may be needed.

ENVIRONMENTAL HAZARDS: 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 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 EPA.

CLEAN FRONT CONCENTRATE may be used to manufacture no-rinse sanitizers, disinfectants, topical animal health care products, hand sanitizers and other antimicrobials. Prior to selling these types of finished products, it is the responsibility of the distributor to obtain the necessary regulatory approvals. Any sanitizer or disinfectant intended for intra or interstate commerce must be registered with the U.S. Environmental Protection Agency. **Clean Front Concentrate** may be used in the manufacture of sanitizers and disinfectants that do not require rinsing after being adequately drained from food contact surfaces at concentrations not exceeding 25 ppm titratable iodine (refer to Federal Regulation No. 178.1010). To meet this requirement, all components used in the finished formulation must also comply with Food and Drug Administration no-rinse regulations. Antimicrobials intended for topical application to humans and animals must be approved by the U.S. Food and Drug Administration.

CLEAN FRONT® Concentrate is a registered trademark of De Laval
035-0544-F1100 *Copyright, 2000, West Agro, Inc.

Clean Front Concentrate®

KEEP OUT OF REACH OF CHILDREN

DANGER: CORROSIVE TO EYES.
(See side panel for additional precautions.)

ACTIVE INGREDIENTS:

TITRATABLE IODINE*	20.0%
INERT INGREDIENTS:	80.0%
TOTAL	100.0%

*From Alpha-(p-nonylphenyl)-omega-hydroxypoly (oxyethylene)-iodine complex

EPA Reg. No. 4959-13-AA

EPA Est. No. 4959-IL-1

NET CONTENTS: 29 U.S. GALLONS

(NET WEIGHT: 330 lbs./149 kgs)

Manufactured by:

WEST AGRO®

WEST AGRO, INC. / KANSAS CITY, MO 64153

ACCEPTED
with COMMENTS
in EPA Letter Dated

JAN 4 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
extended for 12 months
registered under FIFRA Reg. 13

4959-13

CLEAN FRONT CONCENTRATE is a non-ionic surfactant. It is specially formulated for stability in finished products. As a result, it is an over-formulation in finished products.

Clean Front Concentrate is made with additional detergent product contains no phosphates. **Clean Front Concentrate** is sold as an environmental sanitation product only.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product without labeling.

See manufacturing instructions for specific use. Consult Material Safety Data Sheet for additional information.

Only for formulation into Environmental Sanitizers, Disinfectants, Topical Antimicrobials, and other products. Other Antimicrobial Products and uses are not intended. and/or citations of data that the Formulation is for Experimental Purposes that are not intended for use.

NOTE TO FORMULATOR: Mix

Clean Front will flow more easily if warmed to 70°F to 100°F and then stirred.

For Help in a Chemical Emergency Call

STORAGE AND DISPOSAL

Keep container closed when not in use. Do not use for extended periods.

PROHIBITIONS: Do not contain. Open dumping is prohibited.

PESTICIDE DISPOSAL: Pesticide of excess pesticide, spray mixture, waste cannot be disposed of by use of Pesticide or Environment Control Act. Pesticide or Environment Control Act. the nearest EPA regional Office for

CONTAINER DISPOSAL: 1. conditioning or recycling, or incineration, landfill or burn, if allowed by State

LOT NO.: