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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

November 5, 2008.

FILE COPY

Dollie Howser
West Agro, Inc.
11100 N. Congress Ave.
Kansas City, MO 64153

Subject: **Clean Front Concentrate**
EPA Registration Number: 4959-13
Application Dated: October 17, 2008
Receipt Date: October 27, 2008

Dear Ms. Howser:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA Section 3(c) 9.

Proposed Notification

- Updated Label per PR Notice 2007-4.

General Comment

Based on a review of the material submitted, the following comment applies:

This notification is accepted and a copy has been inserted in your file for future reference.

Should you have any questions concerning this letter, please contact Wanda Henson at (703) 308-6345.

Sincerely,

Wanda Henson
Product Reviewer (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
Washington, DC 20460

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 4959-13	2. EPA Product Manager Emily Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CLEAN FRONT CONCENTRATE	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) West Agro, Inc. 11100 N. Congress Ave. Kansas City, MO 64153 <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"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's at 40 CFR 156.10, 156.140, 156.144 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 16 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144 156.146 and 156.156, 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		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 5, 15, 30, 55, 275 gal., Bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled		<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 Dollie Howser		Title Regulatory Specialist		Telephone No. (Include Area Code) (316) 891-1668	
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 Regulatory Specialist			
4. Typed Name Dollie Howser		5. Date 10/17/08			

PRECAUTIONARY STATEMENT: 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.

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.

SWALLOWED: Call a Poison Control Center or doctor immediately 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.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency treatment.

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 DeLaval Inc.

008-0544-10808
Made in U.S.A.

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Iodine, the Element of Confidence

0544

Clean Front[®] Concentrate

A Concentrated Iodophor for Manufacturing Use Only

KEEP OUT OF REACH OF CHILDREN

DANGER: CORROSIVE TO EYES

(See side panel for additional precautions)

ACTIVE INGREDIENT:

Titrateable 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

CLEAN FRONT CONCENTRATE is a high quality iodophor, comprised of iodine and non-ionic surfactants. It is specially formulated to provide superior chemical and physical stability in finished products. As a result, it is often possible to reduce the amount of over-formulation in finished products.

CLEAN FRONT CONCENTRATE is made from biodegradable detergents. It should be formulated with additional detergents which are, themselves, biodegradable. This product contains no phosphates.

CLEAN FRONT CONCENTRATE is sold subject to invoice terms and is for the production of environmental sanitation products only.

NET CONTENTS: 29 Gallons

(Net Weight: 57 lbs / 25.7 kgs)

Manufactured by:

WEST AGRO[®]

WEST AGRO, INC./KANSAS CITY, MO 64153

DIRECTIONS FOR USE

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

See Manufacturing instructions for specific applications.
Consult Material Safety Data Sheet before use.

Only for formulation into Environmental Sanitation Products for the following uses: No-rinse Sanitizer, Disinfectants, Topical Animal Health Care Products, Hand Sanitizers, Other Antimicrobial Products and uses in which USEPA has accepted the required data and/or citations of data that the Formulator has submitted in Support of Registration, and uses for Experimental Purposes that are in compliance with USEPA requirements.

CLEAN FRONT will flow more easily if a day or two prior to formulating it is gradually warmed to 70°F to 100°F and then slowly added in a stream while mixing.

NOTE TO FORMULATOR: Mix well in drum before sampling and before each use.

For Help in a Chemical Emergency, Call 800-424-9300

STORAGE AND DISPOSAL:

Keep container closed when not in use. Do not store below 25°F or above 100°F for extended periods.

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

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 container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying.

5 Gallon or Less Containers - Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 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.

Capacity greater than 5 gallon containers - Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water. Replace and tighten closures. Tip container to its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other 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. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate, or if allowed by State and local authorities, burn container. If burned, stay out of smoke.

LOT NO.:

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