TATES ENVIRONMENTAL PROTECTIO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 2 1 2010

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Ms. Tammy Wright WestAgro, Inc. 11100 N. Congress Avenue Kansas City, MO 64153

Subject:

Econosan Acid Sanitizer

EPA Registration No.: 4959-41 Amendment Date: April 20, 2010 EPA Receipt Date: April 27, 2010

Dear Ms. Wright,

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions listed below.

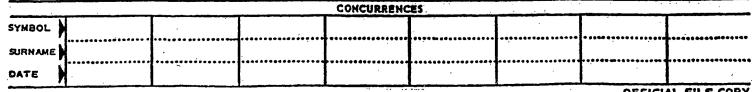
Proposed Amendment

Update First Aid Statements

Conditions

Revise the label as follows:

- 1.) The American Type Culture Collection, ATCC, updated the nomenclature for Salmonella cholerasuis to Salmonella enterica. Revise your label accordingly.
- 2.) The species name for *Listeria* is incomplete; it must read *Listeria monocytogenes*.
- 3.) The third statement in the 2nd paragraph under "Food Processing and Dairy Equipment" must be brought into compliance with PR Notice 2000-5, Mandatory Labeling, by deleting the term, should, and stating "must."
- 4.) The "Container Disposal" statements for 5 gallons or less is incomplete because it lacks guidance on how to discard the container after rinsing. Therefore, add the following statements, "Then offer for recycling or reconditions if available. If not, puncture and dispose of in a sanitary landfill, or incineration, of if allowed by state or local authorities, by burning. If burned, stay out of smoke."



EPA Form 1320-1A (1/90)

Printed on Recycled Paper

General Comments

A stamped label acceptable with conditions is enclosed for your records. Submit one copy of the final printed label before distributing or selling the product bearing the revised labeling.

If you have any questions regarding this letter, please contact Jacqueline McFarlane at (703) 308-6416 or by email at <u>Campbell-mcfarlane.jacqueline@epa.gov</u>. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

acqueline Campbell-McFarlane

Product Manager 34

Regulatory Management Branch II Antimicrobials Division (7510P)

Enclosure: Stamped Label

CONCURRENCES									
SYMBOL					****				
SURNAME									
DATE					************				
OFFICIAL FILE									

ACCEPTED with COMMENTS in EPA Letter Dated:

JUL 21 2010

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

ECONOSAN ACID SANITIZER

ECONOSAN ACID SANITIZER is a non-iodine blended acid Sanitizer for C.I.P. and C.O.P. systems, Tanks and Backflush systems.

ACTIVE INGREDIENTS:

Decanoic Acid	3.0%
Nonanoic Acid	3.0%
Phosphoric Acid	
Sulfuric Acid	9.5%
Propionic Acid	10.0%
INERT INGREDIENTS	
Total	

EPA Reg. No. 4959-41

EPA Est. No. 4959-IL-01

4959-CA-01

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENT:
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE: Causes irreversible eye damage or skin burns. Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE): Applicators and handlers must wear coveralls over long sleeved shirt and long pants, socks and chemical-resistant footwear, goggles or face shield and chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, PV or viton).

PHYSICAL AND CHEMICAL HAZARDS: Mix only with water following label directions. Do not mix with chlorinated cleaners or sanitizers. Toxic chlorine gas will be formed. Contact with soft metals may generate hydrogen gas.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes. 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.

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 immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vorniting unless told to do so by the Poison Control Center or doctor. Do not give anything 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. Call a Poison Control Center or doctor for treatment advice.

HOT LINE NUMBER: In case of emergency call 1-800-424-9300. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

DIRECTIONS FOR USE:

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

On pre-cleaned food contact surfaces ECONOSAN ACID SANITIZER is effective against Salmonella cholerasuis, Listeria monocytogenus and Escherichia coli, 0157:H7, homorphagic.



APPLICATION INSTRUCTIONS:

FOOD PROCESSING AND DAIRY EQUIPMENT:

Remove gross food particles and soil by a pre-flush or pre-scrape and when necessary, pre-soak treatment. Clean all surfaces with an appropriate chlorinated alkaline cleaner, followed by a potable water rinse prior to the application of the sanitizing solution.

Sanitize equipment prior to use with a solution of 1 oz. **ECONOSAN ACID SANITIZER** per 6 gallons of water, to provide 90 ppm of decanoic and nonanoic acid. Circulate sanitizing solution through CIP or COP systems for a minimum of 2 minutes contact time. Sanitizing solution should have a pH of 4 or below. Adequately drain solution. For mechanical operations, the prepared use solution may not be reused for sanitizing, but may be re-used for other purposes such as cleaning. For manual operations, fresh sanitizing solution should be prepared daily or more often if the solution becomes dirty or soiled.

Follow state and local Health Department regulations for cleaning and sanitizing food processing and dairy equipment.

Regular use of ECONOSAN ACID SANITIZER will prevent formation of milk-stone and mineral stone on food contact surfaces.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep container closed when not in use. Do not store below 0°F for extended periods.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of pesticide wastes 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 Regional Office for guidance.

CONTAINER DISPOSAL:

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

5 gation 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 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.

Capacity greater than 5 gallon containers - Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on 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. 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 senitary landfil, or incineration, or, if allowed by state or local authorities, by burning. If burned, stay out of smoke.

CHEMTREC EMERGENCY NO.: 1-800-424-9300

NET CONTENT:

LOT NO .:

Manufactured By:

WEST AGRO, INC. 11100 N. Congress Ave. Kansas City, MO 64153

Made in USA

