

February 9, 2015

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Ms. Cindy Valla Regulatory Coordinator West Agro, Inc. 11100 N. Congress Avenue Kansas City, MO 64153

Subject: PRIA Label Amendment – (*Reduced dilution rate to support sanitizer claim against Staphylococcus aureus and Escherichia coli*) Product Name: Econosan Acid Sanitizer EPA Registration Number: 4959-41 Application Date: September 03, 2014 Decision Number: 495280

Dear Ms. Valla:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. The efficacy data, MRID Nos. 49462801 and 49462801, are acceptable, and the review is attached for your records. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website

contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Lorena Rivas by phone at 703-305-5027, or via email at rivas.lorena@epa.gov.

Sincerely,

Jacque Hardy

Jacqueline Hardy, Product Manager (34) Regulatory Management Branch II Antimicrobials Division (7510P) Office of Pesticide Program

Enclosure: Efficacy Data Evaluation Stamped Accepted Label dated 2/9/15

ECONOSAN TM ACID SANITIZER

Non-lodine Blended Acid Sanitizer for CIP and COP Systems. Tanks, and Backflush Systems

ACTIVE INGREDIENTS

Decanoic Acid	3.0%
Nonanoic Acid	3.0%
Phosphoric Acid	8.5%
Sulfuric Acid	9.5%
Propionic Acid	
INERT INGREDIENTS	<u>66.0%</u>
Total	100.0%

EPA Reg. No.: 4959-41 EPA Est. No.: 4959-IL-01(C), 4959-CA-1(T), 4959-TX-1 (D)

C,T,D - First letter of lot number indicates establishment

KEEP OUT OF REACH OF CHILDREN MANTENER FUERA DEL ALCANCE DE LOS NIÑOS DANGER PELIGRO

PRECAUTIONARY STATEMENT: HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. Causes irreversible eye damage or skin burns. Harmful if swallowed, absorbed 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.

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.

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).

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.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **PESTICIDE STORAGE:** Store only in original container. Keep container closed when not in use and under locked storage sufficient to make it inaccessible to children or persons unfamiliar with its proper use. Do not store below 0°F for extended periods.

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 HANDLING:

For non-refillable containers equal to or less than 5 gallons: Non-Refillable Container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Fill the container ¼ full with water and recap. Shake for 10 seconds. Drain for 10 seconds after the flow begins to drip. Follow Pesticide Disposal instructions for rinsate disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

For non-refillable containers greater than 5 gallons: Non-Refillable Container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: 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 back and forth several times. Turn the container own to its other end and tip back and forth several times. Follow Pesticide Disposal instructions for rinsate disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

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 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 Poison Control Center or doctor for treatment advice.

IF SWALLOWED: Call a Poison Control Center or doctor for treatment advice. Have person sip a glass of water if able to swallow. 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.

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.

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

DIRECTIONS FOR USE

FOLLOW STATE AND LOCAL HEALTH DEPARTMENT REGULATIONS FOR CLEANING AND SANITIZING FOOD PROCESSING AND DAIRY EQUIPMENT. IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

APPLICATION INSTRUCTIONS

Food Processing - Sanitizing:

On pre-cleaned, hard, non-porous, food-contact surfaces at 90 - 180 ppm of deconoic and nonanoic acids combined, Econosan Acid Sanitizer is effective against Salmonella enterica, Listeria monocytogenes and Escherichia coli, 0157:H7. At 68 ppm decanoic and nonanoic acids combined, Econosan Acid Sanitizer is effective against Staphylococus aureus and Escherichia coli.

- 1. Remove gross food particles and soil by a pre-flush or pre-scrape and when necessary, pre-soak treatment.
- Clean all hard, non-porous surfaces with an appropriate chlorinated alkaline cleaner, followed by a potable water rinse prior to the application of the sanitizing solution.
- 3. Sanitize equipment prior to use with a solution of 1 oz. Econosan Acid Sanitizer in 8 gallons of water to 2 oz. Econosan Acid Sanitizer in 6 gallons of water, to provide 68 to 180 ppm of decanoic and nonanoic acids combined. Circulate sanitizing solution through CIP or COP systems for a minimum of 2 minutes contact time. Sanitizing solution must have a pH of 4 or below. Adequately drain solution. For mechanical operations, the prepared use solution may not be reused for sanitizing solution should be prepared daily or more often if the solution becomes dirty or soiled.

AUTHORIZED BY USDA FOR USE IN FEDERALLY INSPECTED MEAT AND POULTRY PLANTS

FOR INDUSTRIAL USE ONLY

Food Processing - Descaling and Sanitizing:

Regular use of Econosan Acid Sanitizer for descaling and sanitizing will prevent formation of milkstone and mineral stone on hard, non-porous, food-contact surfaces. On pre-cleaned, hard, non-porous, food-contact surfaces Econosan Acid Sanitizer is effective against Salmonella enterica, Listeria monocytogenes and Escherichia coli, 0157:H7.

- Remove gross food particles and soil by a pre-flush or pre-scrape and when necessary, pre-soak treatment.
- Clean all hard, non-porous surfaces with an appropriate chlorinated alkaline cleaner, followed by a potable water rinse prior to the application of the sanitizing solution.
- 3. Sanitize equipment prior to use with a solution of 1 oz 2 oz of Econosan Acid Sanitizer in 6 gallons of water, to provide 90 180 ppm of decanoic and nonanoic acids combined. Circulate sanitizing solution through CIP or COP systems for a minimum of 2 minutes contact time. Sanitizing solution must 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 solied.

Dairy Equipment:

LOT NO:

Regular use of Econosan Acid Sanitizer on dairy equipment will prevent formation of milkstone and mineral stone on hard, non-porous surfaces. On pre-cleaned hard, non-porous surfaces, Econosan Acid Sanitizer is effective against Salmonella enterica, Listeria monocytogenes and Escherichia coli, 0157:H7.

- Remove gross food particles and soil by a pre-flush or pre-scrape and when necessary, pre-soak treatment.
- Clean all hard, non-porous surfaces with an appropriate chlorinated alkaline cleaner, followed by a potable water rinse prior to the application of the sanitizing solution.
- 3. Sanitize equipment prior to use with a solution of 1 2 oz. Econosan Acid Sanitizer per 6 gallons of water, to provide 90 180 ppm of decanoic and nonanoic acid combined. Circulate sanitizing solution through CIP or COP systems for a minimum of 2 minutes contact time. Sanitizing solution must have a pH of 4 or below. Adequately drain solution. For mechanical operations, the prepared use solution man 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 solied.

CHEM-TREC EMERGENCY: # 1-800-424-9300

Manufactured by: West Agro, Inc. 11100 N. Congress Ave. Kansas City, Missouri 64153



Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 4959-41