

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 27 1995

Kay Chemical Company  
P.O. Box 18407  
Greensboro, NC 27419

Attention: Eliot I. Harrison  
Delta Analytical Corporation  
Authorized Agent for Kay Chemical Company

Subject: Kay-5 NP Sanitizer  
EPA Registration Number 5389-15  
Your Submission of June 5, 1995

This letter addresses your proposed, revised product labeling submitted in response to the Notice of Registration issued for this product on March 30, 1995. Your request for new product labeling included revisions to precautionary language, a proposal to use the term "First Aid" instead of the terms "Statement of Practical Treatment (First Aid)" and to be allowed to use the statement "Contains No Phosphates". Your submission also included a request for a re-review of the skin irritation study originally submitted August 1994 which was graded by the Agency as an unacceptable study. This letter also addresses the results of the Agency's review of the Acute Inhalation and Dermal Sensitization studies submitted in January of this year. Your submissions have completed review and the following comments apply:

1. The skin irritation study (MRID No. 432506-01), reviewed in combination with new study information, has been upgraded to acceptable core data. Based on this study, this product is now classified as Toxicity Category III for skin irritation.
2. The acute inhalation study (MRID No. 435148-01) is acceptable in support of this registration. It has been classified in Toxicity Category IV.
3. The dermal sensitization study (MRID No. 435148-02) is classified as acceptable. This product is classified as a sensitizer. A copy of the review is enclosed.

1 of 7

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

The revised product labeling submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the following revisions before you release the product for shipment bearing the amended labeling.

1. The precautionary statements must be revised as follows: Caution: "Harmful if swallowed or absorbed through skin. Causes Moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals".
2. The statements in the "First Aid" section must be revised as follows:
  - a. For the eye statement, change "seek medical attention...." to Call a physician...".
  - b. For the skin statement change "seek medical attention if irritation occurs" to Get medical attention".
  - c. Revise the ingestion statement to read "If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do no induce vomiting in or give anything by mouth to an unconscious person".

A stamped copy of your labeling is enclosed for your records. Submit five copies of the final printed label prior to release of the product for shipment.

If you should have any questions concerning this letter, you may call Robert Travaglini on (703) 305-6909.

Sincerely,



Ruth Douglas  
Product Manager (32)  
Antimicrobial Program Branch  
Registration Division (7505C)

3 of 7

**PACKET LABEL**

**KAY-5 NP  
SANITIZER**

Chlorinating Sanitizer for shake machines, soft  
serve machines, kitchen utensils and  
equipment.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See outer carton label for Precautionary and First Aid Statements  
and Use Directions.

Do not reuse packet.

Discard empty packet in trash.

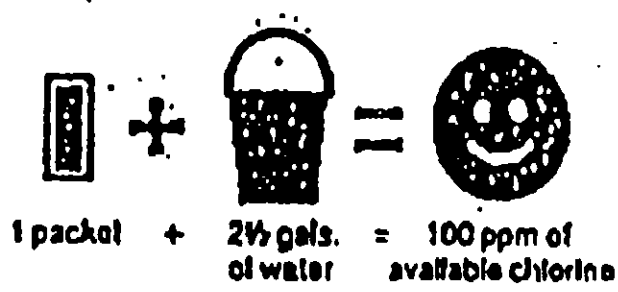
**ACCEPTED**  
with **COMMENTS**  
in EPA Letter Dated:

JUN 27 1985

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide  
registered under EPA Reg. No.  
5389-15

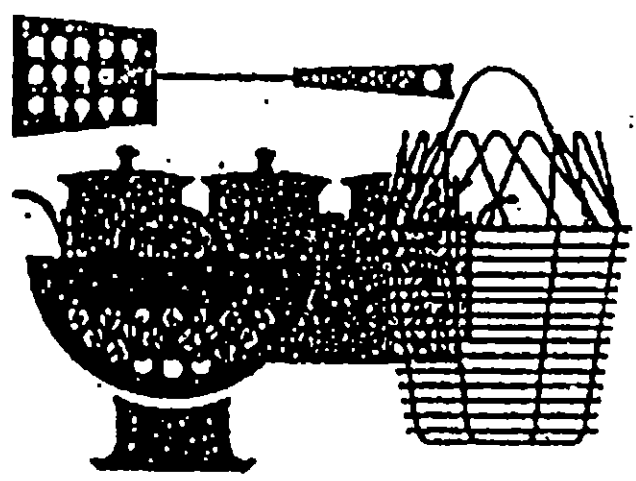


Manufactured by  
**KAY CHEMICAL COMPANY**  
GREENSBORO, NORTH CAROLINA 27409



<b>Active Ingredient</b>	
Sodium Dichloro-s-Triazinetrione Dihydrate .....	6.0%
<b>Inert Ingredients</b> .....	94.0%
<b>TOTAL</b> .....	100.0%

3.36% Available Chlorine  
 Contains no phosphates.



ACCEPTED  
 with COMMENTS  
 in EPA Letter Dated:

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act as  
 amended, for the pesticide  
 registered under EPA Reg. No.  
 5389-15

NET WEIGHT - 1 oz. (28.4 gms)  
 EPA REG. No. 5389-15  
 EPA ESTABLISHMENT NO. 5389-NC-1

### DIRECTIONS FOR USE

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

#### SHAKE AND SOFT SERVE MACHINES CLEANING PROCEDURE

1. Remove mix from the machine. If local health codes permit rerun, place mix in sanitized rerun container and store in refrigerated cooler.
2. Rinse the interior of the machine (cylinder, feed tubes, etc.) by activating the "Wash" cycle and drawing through 2 gallons of lukewarm water. Repeat the rinsing procedure until the water runs clear. Turn the machine to the "Off" position.
3. Prepare a cleaning solution of Kay-5 NP by dissolving 1 packet in 2-1/2 gallons of lukewarm water.
4. Clean the interior of the machine by activating the "Wash" cycle and filling the cylinder and feed tubes with the cleaning solution. Turn the machine to the "Off" position. Brush clean the feed tube and inlet hole. With the cleaning solution in the cylinder, reactivate the "Wash" cycle and allow to remain on for five minutes.
5. Drain the solution from the machine. Turn machine to the "Off" position.
6. Remove and completely disassemble all machine parts (doors, blades, pump, etc.).
7. Brush wash all disassembled parts in a solution of Kay-5 NP in a clean sink.
8. Remove parts and allow to air dry.
9. Repeat the cleaning procedure for machines with two freezing cylinders.

Alternatively, a suitable detergent may be used for cleaning followed by a water rinse and a sanitizing rinse using KAY-5 NP solution.

#### SANITIZING PROCEDURE

1. Following manufacturer's instructions, reassemble the machine.
2. Prepare a sanitizing solution by dissolving a packet of KAY-5 NP in 2-1/2 gallons of lukewarm water.
3. Sanitize the interior of the machine by activating the "Wash" cycle and filling the cylinder and feed tubes with the sanitizing solution. Allow the "Wash" cycle to run for 5 minutes.
4. Drain the solution from the machine. Turn machine to the "Off" position.
5. Repeat the sanitizing procedure for machines with two freezing cylinders. DO NOT RINSE.

NOTE: Consult local ordinances for possible variation in procedures.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by the use, storage or disposal of this product.

STORAGE: Keep product dry in tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame.

DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Place completely empty packets and cartons in trash collection or dispose of in a sanitary landfill or incinerator.

5 9 7  
**KAY**  
**SAN**

Chlorinating sanitizer  
serve machines, kits

**Active Ingredients:**  
 Sodium Dichloro-s  
 Dihydrate . . . . .  
**Inert Ingredients** .  
 TOTAL . . . . .

3.36%  
Contain

KEEP OUT OF

Read First Aid ar  
or

FOR INSTITUTION.  
NET WEIGHT:

4 lbs, 4 oz;  
100, 125 or

Mc  
**KAY CHE**  
 GREENSBORO,  
 EPA R  
 EPA ES

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5

6 of 7

# KAY-5 NP SANITIZER

Chlorinating sanitizer for shake machines, soft  
serve machines, kitchen utensils, and equipment.

### Active Ingredients:

Sodium Dichloro-s-Triazinetrione Dihydrate .....	6.0%
Inert Ingredients .....	94.0%
TOTAL .....	100.0%

3.36% available chlorine  
Contains no phosphates.

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

Read First Aid and Precautionary Statements  
on Side Panel.

**FOR INSTITUTIONAL USE ONLY**

**NET WEIGHT:**

4 lbs, 4 oz; 7 lbs, 13 oz or 12 lbs, 8 oz  
100, 125 or 200/1.0 oz packets

Manufactured by

**KAY CHEMICAL COMPANY**

GREENSBORO, NORTH CAROLINA 27409

EPA REG. NO. 5389-15

EPA EST. NO. 5389-15

ACCEPTED  
with COMMENTS  
in EPA Letter: Date:

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Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide  
registered under EPA Reg. No.  
5389-15

### KITCHEN UTENSILS AND EQUIPMENT

1. Scrape or rinse all loose food soils.
2. Brush wash with a suitable detergent.
3. Rinse thoroughly with clean hot water.
4. In a clean sink, prepare a sanitizing solution of KAY-5 NP Sanitizer in lukewarm water according to the dilution table. Immerse utensils or equipment for 1-2 minutes. Remove and drain. **DO NOT RINSE.** Place on a clean surface to dry. Follow local health ordinance.

NOTE: To sanitize previously cleaned stationary equipment and other hard, non-porous food contact surfaces, flood the surface with the sanitizing solution, or apply with a clean cloth, sponge or spray, making sure to completely wet all surfaces for at least 60 seconds. Let air dry. Follow local health ordinances.

DILUTION TABLE		
No. of Packets	Amt. of Water	ppm of Available Chlorine
1	2-1/2 gals.	100
2	5 gals.	100
4	10 gals.	100

Solutions may be prepared in appropriate dispensers according to the dilution table and drawn as needed. Prepare a fresh solution daily or when the available chlorine level falls below 50 ppm.

Store clean wiping cloths in a solution of 1 packet sanitizer per 2-1/2 gallons lukewarm water to keep them in a sanitary condition between uses.

### FIRST AID

IF SWALLOWED: Drink large quantities of water. Avoid alcohol. Do not induce vomiting. Get medical attention.

IF IN EYES: Hold eyelids open and flush with gentle stream of water for 15 minutes. Seek medical attention if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Seek medical attention if irritation occurs.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth.

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

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with eyes, skin or clothing. Avoid breathing dust when mixing with water. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

#### PHYSICAL AND CHEMICAL HAZARDS

Oxidizing agent. Do not use in combination with soap, detergent or other chemicals. Do not mix with ammonia. Contamination with moisture, dirt, organic matter may cause chemical reaction with generation of heat, and/or liberation of hazardous gases.

For medical emergency information call 1-800-304-0824

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6

7 of 7

# KAY-5 NP SANITIZER

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shake machines, soft  
utensils, and equipment.

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6.0%  
94.0%  
100.0%

DILUTION TABLE		
No. of Packets	Amt. of Water	ppm of Available Chlorine
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## PRECAUTIONS

Precautionary Statements  
Label Panel.

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## USE ONLY

13 oz or 12 lbs, 8 oz  
1.0 oz packets

Manufactured by  
**AL COMPANY**  
WYOMING, NORTH CAROLINA 27409  
PHONE NO. 5389-15  
FAX NO. 5389-NC-1

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

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7