

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 25, 2004

Cristina N. Griffin
Delta Analytical Corporation
Agent for US Chemical Corp.
7910 Woodmont Avenue, Suite 1000
Bethesda, MD 20814

Subject: **O-San**
EPA Registration Number 7546-4
Application dated April 23, 2004

Dear Ms. Griffin:

This will acknowledge receipt of your notification, submitted under the provisions of PR Notice 98-10, FIFRA section 3 (c) 9.

Proposed Notification:

- minor label changes to the Directions for Use

General Comment:

Based on a review of the material submitted, the following comment apply.

The notification is acceptable. A copy of the notification has been inserted in your file for future reference.

Should you have any questions concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,

Renae Whitaker
Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510C)

SYMBOL							
SURNAME							
DATE							

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United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number
303494

Application for Pesticide - Section I

1. Company/Product Number: 7546-4	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product Name: US CHEMICAL CORP./ O-San	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) US CHEMICAL CORP c/o Delta Analytical Corp. 7910 Woodmont Ave. Suite 1000 Bethesda MD 20814 <input type="checkbox"/> Check this box if 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

Amendment - Explain below
 Resubmission in response to Agency letter dated _____
 Notification - Explain below

Final printed labels in response to Agency letter dated _____
 "Me Too" Application.
 Other - explain below.

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

Notification of minor label changes to the Directions for Use section per PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input 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 Package wgt. No. per container	If "Yes," Unit Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) of Retail Container

5. Location of Label Direction
 On Label
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
 Lithograph
 Paper glued
 Stenciled
 Other _____

Section - IV

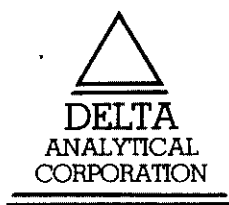
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Cristina Griffin	Title Agent for US CHEMICAL CORP.	Telephone No. (Include Area Code) 301-652-5495
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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 kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Agent for US CHEMICAL CORP.	6. Date Application Received (Stamped)
4. Typed Name Cristina Griffin	5. Date April 23, 2004	



April 23, 2004

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
Environmental Protection Agency
Ariel Rioss Building
1200 Pennsylvania Ave., N.W.
Washington DC 20460

Product Manager: Marshall Swindell, PM 314

Re: Notification of minor label changes to the Directions for Use section per PR notice 98-10
Product: O-San
EPA Reg. No.: 7546-4
Company: US Chemical Corporation

Dear Marshall:

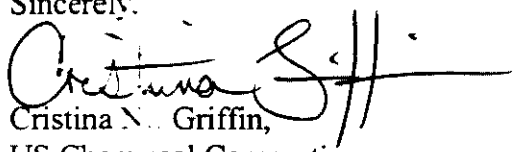
On behalf of US Chemical Corporation, I am submitting a notification of minor label changes to the Directions for Use section for O-San, EPA Reg. No.: 7546-4. The changes are shown on the highlighted label.

Enclosed are:

- 1. EPA form 8570-1
- 2. 2 copies of the label with changes clearly marked

If you have any questions regarding this submission, please call me at (301) 652-5495.

Sincerely,


Cristina N. Griffin,
US Chemical Corporation

cc: Carol Schwartz, US Chemical Corporation

4 8 6

O-SAN

Odorless Sanitizer Designed
for Third Tank Glasswashing and
Food Processing Hard Surface Sanitization

ACTIVE INGREDIENTS:

Phosphoric Acid	20.00%
Dodecyl Benzene Sulfonic Acid	5.00%
OTHER INGREDIENTS	<u>75.00%</u>
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN.

DANGER

**HARMFUL IF SWALLOWED. SEVERELY IRRITATING TO THE SKIN.
CORROSIVE TO THE EYES.
(See side panel for additional precautions.)**

FIRST AID	
If Swallowed	<ul style="list-style-type: none"> • Call Poison Control Center or doctor immediately 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 on Skin or Clothing	<ul style="list-style-type: none"> • 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 Inhaled	<ul style="list-style-type: none"> • 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 further treatment advice.
If in Eyes	<ul style="list-style-type: none"> • 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 eye. • Call a Poison Control Center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For Medical Emergency ONLY call (24 hour): 1-800-228-5635 ext. 075</p>	
<p>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

E.P.A. Reg. No. 7546-4

E.P.A. Est. No. 7546-WI-1

**Manufactured By U S Chemical
Watertown, WI 53094**

NET CONTENTS:

**U.S. GALLONS
(3.79 Liters/Gal.)**

For product information, contact your local distributor.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or adsorbed through skin or inhaled. Do not get in eyes, on skin or 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.

ENVIRONMENTAL HAZARDS

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.

USE DILUTION: 1 ounce to 2 gallons

PHOSPHOROUS CONTENT: Not over 6.5%

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. READ AND UNDERSTAND LABEL AND MATERIAL SAFETY DATA SHEET BEFORE USE.

THIRD TANK GLASS WASHING

General Information

For Use in Food Service Areas of Public Eating Places, Healthcare Facilities, Schools and Bars.

O-SAN is an acid-anionic type sanitizer for glassware and other utensil sanitization. It is for bar glassware because it has no odor in use dilution and completely eliminates problems from water hardness minerals. It provides a brilliant, odor-free glimmering glass after every wash-sanitize cycle and keeps glassware, drain-boards and sinks free of hard water film.

1. Pre-flush and/or scrape utensils and glasses where possible.
2. Wash in a recommended manual detergent.
3. Rinse with clean water.
4. Sanitize in a solution of 1 ounce of **O-SAN** to 2 gallons of water (200 *ppm) Check solution with short range (3.0-5.5) pH papers. 200 *ppm = 4.5 pH. If pH reads greater than 4.5, add more product to solution and check pH again. If pH reads less than 4.5, dilute solution with water and check again.
5. Place sanitized utensils on a CLEAN, SANITIZED rail or drainboard to air dry.

~~**NOT recommended for use in galvanized sinks. Do not mix with chlorine, lye, washing powders, or household chemicals.**~~

~~*p.p.m. means "parts per million" active sanitizer. <note: moved to next page>~~

FOOD PROCESSING HARD SURFACE SANITIZATION**General Information**

O San is a concentrated product and must be diluted before using. Recommended for use on pre-cleaned, hard, non-porous, environmental surfaces in food processing, milk manufacturing and dairy farms.

PREPARATION: Remove gross soils by flushing with water, scraping or brushing. Pre-clean all surfaces. Rinse thoroughly with potable water.

HARD SURFACE SANITIZATION: (glass or stainless, fillers, pipelines, silos, processing vats, bulk tanks and utensils): To sanitize previously cleaned equipment and utensils dip, brush, or spray equipment with a solution of O-SAN at 1 ounce to 2 gallons of water. Provides 200 ppm active sanitizer. Allow at least 3 minutes contact time. Allow equipment to drain well, blow or air dry. ~~When used at levels not exceeding 350 ppm, this product does not require a potable water rinse in accordance with the Code of Federal Regulations Title 21 Part 178.1010.~~ Prepare fresh solution daily. For mechanical applications, used sanitizing solutions may not be reused for sanitizing applications. Mix only with water.

[the following may be used with either set of directions above]

~~Do not mix with products or solutions containing chlorine.~~ NOT recommended for use in galvanized sinks. Do not mix with ~~products or solutions containing~~ chlorine, lye, washing powders, or household chemicals. O-SAN is authorized ~~by USDA~~ for use in federally inspected meat and poultry plants.

* p.p.m. means "parts per million" active sanitizer.

STORAGE AND DISPOSAL

Storage: Store in a cool, dry place. Store in original container only.

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 used 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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.