

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 25, 2004

Cristina Griffin
Agent for
US Chemical Corporation
c/o Delta Analytical Corporation
7910 Woodmont Avenue
Suite 1000
Bethesda, MD 20814

Subject: O-SAN
EPA Registration No. 7546-4
Application Dates: August 2, 2004
EPA Received Dates: August 6, 2004

Dear Ms. Griffin:

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

Proposed Notification

- Minor label revision (correct typographical error)

General Comments

Based on a review of the material submitted, the following comments apply:

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

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,

Adam Heyward
Product Manager 34


Regulatory Management Branch II
Antimicrobials Division (7510.C)

CONCURRENCES				
SYMBOL	7546-4			
SURNAME	Heyward			
DATE	8/25/04			

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060.

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number 303509
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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 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

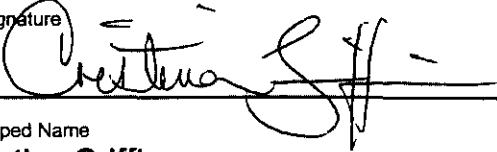
<input type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - explain below.
NOTIFICATION Date Reviewed: _____ Reviewed By: _____	
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Notification to correct typographical error.	
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 <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container	5. Location of Label Direction <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner In Which Label Is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

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

Certification		6. Date Application Received (Stamped)
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.	
4. Typed Name Cristina Griffin	5. Date August 2, 2004	

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August 2, 2004

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

Attn: Marshall Swindell, PM 33

Re: Notification per PR Notice 98-10 to correct typographical error in which contact time was inadvertently deleted
 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 to correct a typographical error.

Background

Recently we submitted a label amendment to the California Department of Pesticide Regulation. This amendment necessitated review of the entire label by the efficacy specialist in DPR, something which had not been done in many years. In reviewing the label, the DPR efficacy specialist found that there is no contact time under the directions for Third Tank Glass Washing. He reviewed the situation further and found that a 1982 EPA stamped label included a contact time of 2 minutes for that use. Apparently this contact time was dropped in 1986, and both EPA and California DPR continued to approve the label with no comment up through the present. We do not know why the contact time was dropped, as that was many years ago, but after review, we have concluded that it was an inadvertent error. California DPR staff asked us to submit a notification to US EPA since the contact time was approved by EPA on a previous label. We are enclosing a copy of an EPA stamped label which includes the contact time. (Note, we were not able to locate the 1982 label which California DPR has, but we are enclosing a copy of the label from 1974. The California DPR registration specialist handling this is Paul Dehar, and he can be reached at 916-324-3884 if you have further questions.)

Enclosed are:

1. EPA form 8570-1
2. 2 copies of the label with change clearly marked
3. Copy of EPA letter dated November 4, 1974 with EPA stamped label, (showing contact time was originally on the label).

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

Sincerely,


 Cristina N. Griffin,
 Agent for US Chemical Corporation

4 7 6

O-SAN

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

NOTIFICATION
Date Reviewed: 8-24-04
Reviewed By: *[Signature]*

ACTIVE INGREDIENTS:

Phosphoric Acid	20.00%
Dodecyl Benzene Sulfonic Acid	5.00%
OTHER INGREDIENTS	75.00%
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. Immerse all utensils for at least two minutes or for contact time specified by governing sanitary code.
5. Place sanitized utensils on a CLEAN, SANITIZED rail or drainboard to air dry.

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. 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]

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 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.