8405-2

06/03/2004 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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June 3, 2004

Edward Ruggeri Webco Chemical Corp. 420 West Main Street Dudley, MA 01571

Subject: FS-100 Liquid Sanitizer EPA Registration No. 8405-2 Application Date: March 5, 2004 Receipt Date: March 10, 2004

Dear Mr. Ruggeri:

The following amendment for a revised label per PR Notice 2001-1, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

Conditions

1. Revise the Ingredient statement as follows:

Active Ingredient*:	
Sodium Hypochlorite	8.40%
Other Ingredients	91.60%

* This product contains a single active ingredient. Therefore, the (s) must be removed from the word Ingredient.

- 2. The term "Toxicity Category I" should be removed from the "First Aid" section of the label.
- 3. Webco Chemical Corp. is the primary registrant for the product reference above. The Agency holds the primary registrant accountable for the labeling attached to his/her registration. Therefore, Webco Chemical Corp. should be reflected on the label. The label should read as "Manufactured by Webco Chemical Corp."

CONCURRENCES									
SYMBOL	7510C								
	Mitche 11								
DATE	6-3-04								

EPA Form 1320-1A (1/90)

Generating Office: 1992 --- 820-856/40872

General Comments

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A stamped copy of the labeling accepted with conditions is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Mitchell at (703) 308-6345.

Sincerely,

Emily H. Mitchell Product Manager - Team 32 Regulatory Management Branch II Antimicrobials Division (7510C)



ACCEPTED with COMMENTS - EPA Letter Dated:

JUN - 3 2004

Under the Federal Insecticide, Fungicide and Redenticide Act as amended, for the pesticide, registered under EPA Reg. No. 8405-2

A Sodium Hypochlorite Solution FOR SANITIZING DAIRY AND FOOD HANDLING EQUIPMENT

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

STRONG OXIDIZING AGENT: Mix only with water according to label directions. Mixing this product with chemicals (e.g., ammonia, acids, detergents, etc.) or organic matter (e.g., urine, feces, etc.) will release chlorine gas which is irritating to eyes, lungs and mucous membranes.

STORAGE AND DISPOSAL

OR Store this product in a cool dry area, away from direct sunlight and CLOTH heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be oiluted with water before disposal in a sanitary sewer. Do not reuse container but place in trash collection. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

DISPOSAL: FS-100 wastes are acutely hazardous. Improper disposal of excess FS-100 spray, mixture, or rinsate is a violation of Federal Law If those wastes cannot be disposed of by use according to label SWALL instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office.

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

Hypochlorite solutions, 8, UN 1791, PG II

ACTIVE INGREDIENTS: KEEP OUT OF REACH OF CHILDREN



FIRST AID

IF IN EYES	 Hold eye open and rinse slowly and gently with tepid water for 15-20 minutes. Hold eyelid open to ensure complete irrigation of eye and lid tissue. Tilt head to the side and irrigate the eye from the bridge of the nose to the outside of the face. Keep run-off from entering the other eye, mouth or ear. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing the eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN Or Clothing	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Discard contaminated clothing and footwear or wash before reuse. Call a poison control center or doctor for treatment advice.
IF SWALLOWED	 DO NOT INDUCE VOMITING unless told to do so by the poison control center or doctor. Call poison control center or doctor immediately for treatment advice. Rinse mouth with fresh, tepid water, then immediately drink 4-8 oz. of milk or water. Never give anything by mouth to an unconscious person. Keep head lower than hips to prevent aspiration into the lungs.
IF INHALED	 Move person to fresh air. If person is not breathing call 911 or an ambulance, then give artificial respiration. Call a poison control center or doctor for further treatment advice.
	ICAL EMERGENCIES CALL 1-800-424-9300 Class of Pesticide Category I
	e product container or label with you when calling n control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, may cause severe skin and eye irritation or chemical burns to broken skin. Causes eye damage. Wear safety glasses or googles and rubber gloves when handling this product. Wash after handling. Avoid breathing vapors. Vacate poorly ventilated areas as soon as possible. Do not return until strong odors have dissipated.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

NOTE: This product degrades with age. Use a chlorine test kit and increase dosage, as necessary, to obtain the required level of available chlorine.

SANITIZATION OF DAIRY FOOD CONTACT SURFACES

RINSE METHOD-A solution of 100 ppm available chlorine may be used in the sanitizing solution. If a chlorine test kit is available, solutions containing an initial concentration of 100 ppm available chlorine must be tested and adjusted periodically to insure that the available chlorine does not drop below 50 ppm. Prepare a 100 com sanitizing solution by thoroughly mixing 1 oz. of this product with 6 gallons of water. If a test kit is not available, prepare a sanitizing solution by thoroughly mixing 1 oz. of this product with 3 gallons of water to provide approximately 200 ppm available chlorine by weight.

Clean equipment surfaces in the normal manner. Prior to use, rinse all surfaces thoroughly with the sanitizing solution, maintaining contact with the sanitizer for at least 2 minutes. If solution contains less than 50 ppm available chlorine, as determined by a suitable test kit, either discard the solution or add sufficient product to reestablish a 200 ppm residual. Do not rinse equipment with water after treatment and do not soak equipment overnight.

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Manufactured hu webco Chemical Corp. 420 West Main Street Dudley, MA 01571

MANUFACTURED EXCLUSIVELY FOR IBA INC. SANITATION DIVISION 27 PROVIDENCE ROAD MILL BURY MA 01527