

JUN 22 1994

Mr. Archy F. Slover
Morgan-Gallacher, Inc.
8707 Millergrove Drive
Santa Fe Springs, CA 90670

SUBJECT: SHUR-SAN
EPA Registration No. 9152-19
Eight Month Response to the Chlorinated
Isocyanurate Reregistration Eligibility
Document (RED)

Dear Mr. Slover:

This is in response to your application for reregistration of the subject product under the Chlorinated Isocyanurate RED.

Your 8-month response in support of reregistration of this product was incomplete. This letter indicates the deficiencies in your submission. A Notice of Intent to Suspend the registration of your product will be issued if you do not respond to this letter within 15 days.

PRODUCT CHEMISTRY

- 1. The referenced product chemistry data pertaining to this end-use product, SHUR-SAN, has been previously reviewed and found acceptable in support of product reregistration.
- 2. The submitted Confidential Statement of Formula (CSF) is unacceptable. The nominal concentration of 16.5% should fall between the upper and lower certified limits, not equal to the lower limit. You may wish to reduce the lower certified limit to 16.3%. A revised CSF is needed.

ACUTE TOXICITY

- 1. The MRID #408985-02 cited for acute oral toxicity, acute dermal toxicity, primary eye irritation, and dermal irritation does not support reregistration of the subject product. The subject product is in Batch 4 in the RED, and contains 16% active ingredient.

CONCURRENCES

SYMBOL	7505C						
SURNAME	Thompson						
DATE	6-22						

The MRID cited contains studies performed on EPA Reg. No. 524-106 which is included in Batch 26, and is 96% active ingredient. Citation of the MRID #408985-02 is not acceptable as an 8-month response for the subject product. You must submit acute oral toxicity, acute dermal toxicity, primary eye irritation, and dermal irritation studies, or cite previously submitted studies relevant to the subject product.

2. You must provide a complete set of six acute toxicity studies for review. On a "Data Requirement Listing for the Owner Submission Method of Support" form, you checked box "9f. N.A. or waiver or other (explain)" for the acute inhalation toxicity and dermal sensitization studies. No explanation was included in the submission concerning the "N.A., waiver or other" action signified by this response. Waiver requests are to be submitted for review at the 90 Day RED Response. There is no record of such a waiver request.

3. You must either submit acute inhalation toxicity and dermal sensitization studies for review, cite a previously submitted study relevant to the subject product, or, if applicable, provide data certifying that these studies could not be performed.

LABELING

1. The first letter of "Keep, Out, Reach ~~and~~ Children" should be capitalized in the child hazard warning statement.

2. Change the Environmental Hazards statement to: "This pesticide is toxic to fish and aquatic organism. 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."

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Additional labeling revisions might be necessary after receipt of the requested information.

If you have any further questions, please contact Ms. Barbara Pringle at (703)305-6484.

Sincerely,



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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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JUN 22 1994

JUN 22 1994

Mr. Archy F. Slover
 Morgan-Gallacher, Inc.
 8707 Millergrove Drive
 Santa Fe Springs, CA 90670

Dear Mr. Slover:

SBJECT: SHUR-SAN
 EPA Registration No. 9152-19
 Amendments of October 7, 1993 and December 14, 1993

This is in response to above amendments correcting dosage rates in the usage of this product. The change from 300 ppm to 100 ppm is acceptable.

The label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. Please submit five copies of the final printed label before shipment of the product bearing the amended labeling. A stamped copy of the label is enclosed for your records.

If you have any further questions, please call Ms. Barbara Pringle at (703) 305-6484.

Sincerely,



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

CONCURRENCES

SYMBOL	7505C						
SURNAME	Pringle						
DATE	6-9						

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SHUR-SAN SANITIZER IS RECOMMENDED FOR USE ON FOOD PROCESSING EQUIPMENT AND UTENSILS INCLUDING DAIRY AND BREWERY PLANTS. IT IS ALSO RECOMMENDED FOR USE ON DISHES AND GLASSES IN RESTAURANTS.

DIRECTIONS FOR USE

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

FOR NON-RESIDENTIAL USE ONLY

DIRECTION FOR SANITIZING FOOD PROCESSING OR DAIRY EQUIPMENT

PRE FLUSH TANKS, SILOS, VATS, TABLES AND SMALL PARTS WITH POTABLE WATER AND SOAK OR WASH WITH DETERGENT. THIS IS EFFECTIVE WHEN APPLIED BY BRUSH OR PRESSURE WASHER. ALL FOOD PARTICLES MUST BE REMOVED. RINSE WITH POTABLE WATER BEFORE APPLYING THE SHUR-SAN.

FLUSHING OR RINSING: DISSOLVE 1 OUNCE OF SHUR-SAN IN EACH 7 1/2 GALLONS OF WATER REQUIRED. THIS WILL YIELD APPROXIMATELY 100 ppm AVAILABLE CHLORINE. BRUSH BY HAND ANY SURFACES NOT REACHED BY THE FLOWING SOLUTION. CONTACT TIME SHOULD BE AT LEAST TWO MINUTES. TEST SOLUTION DURING USE TO MAKE SURE THE CONCENTRATION DOES NOT DROP BELOW 50 ppm AVAILABLE CHLORINE. DO NOT RINSE. DRAIN SHUR-SAN SOLUTION FROM SURFACE AND AIR DRY.

SPRAYING: DISSOLVE 1 OUNCE OF SHUR-SAN IN EACH 7 1/2 GALLONS OF WATER REQUIRED. THIS WILL YIELD APPROXIMATELY 100 ppm AVAILABLE CHLORINE. SPRAY ALL SURFACES THOROUGHLY. LEAVE SOLUTION ON SPRAYED SURFACES FOR AT LEAST 5 MINUTES OR LONGER WHERE SPECIFIED BY LOCAL REGULATIONS. DO NOT RINSE. ALLOW TO DRAIN AND AIR DRY.

DO NOT RE-USE SHUR-SAN SOLUTION FOR SANITIZING MECHANICAL OPERATIONS. PREPARE FRESH SHUR-SAN SOLUTION AT LEAST DAILY OR MORE OFTEN IF THE SOLUTION BECOMES DILUTED OR SOILED.

DILUTION TABLE

1 oz. per 7 1/2 gallons = 100 ppm
2 oz. per 7 1/2 gallons = 200 ppm
3 oz. per 7 1/2 gallons = 300 ppm

STORAGE AND DISPOSAL

- 1. PROHIBITIONS:** Do not contaminate water, food or feed by storage or disposal. Open burning and dumping is prohibited.
- 2. 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.
- 3. CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If liner is contaminated and cannot be reused, dispose of in the same manner.

SHUR-SAN

SANITIZING COMPOUND

FORMULATED ESPECIALLY FOR FOOD PROCESSORS

EQUIPMENT IN THE FOOD PLANT SHOULD BE THOROUGHLY CLEANED AND RINSED AFTER DAILY USE. DISINFECT EQUIPMENT AFTER USE OR AT TIME SPECIFIED BY LOCAL REGULATIONS.

Keep out of reach of children.

DANGER

SEE RIGHT PANEL FOR ADDITIONAL CAUTIONS

ACTIVE INGREDIENTS: Sodium dichloro-s-triazinetrione 16.1%
INERT INGREDIENTS: 83.9%

(AVAILABLE CHLORINE - 10%)

EPA Reg. No. 9152-19

ACCEPTED with amendments by EPA Est. No. 9152-CA
by 101 Letter Dated:

JUN 22 1994

U.S. Environmental Protection Agency
Washington, DC 20460

9152-19

(310) 695-1232

Morgan-Gallagher, Inc.

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APPROVED FOR USE ON FOOD PROCESSING
MILKING DAIRY AND BREWERY PLANTS. IT IS
USEFUL IN DISHES AND GLASSES IN RESTAURANTS.

CAUTIONS FOR USE
FEDERAL LAW TO USE THIS PRODUCT
CONSISTENT WITH ITS LABELING.

RESIDENTIAL USE ONLY

FOOD PROCESSING OR DAIRY EQUIPMENT

TABLES AND SMALL PARTS WITH POTABLE
WATER DETERGENT. THIS IS EFFECTIVE WHEN
USED IN WASHER. ALL FOOD PARTICLES MUST BE
REMOVED BEFORE APPLYING THE SHUR-SAN.

ONE QUINCE OF SHUR-SAN IN EACH 7 1/2 GALLONS
WATER YIELD APPROXIMATELY 100 PPM AVAILABLE
CHLORINE. SURFACES NOT REACHED BY THE FLOWING
WATER SHOULD BE A LEAST TWO MINUTES. TEST SOLUTION
CONCENTRATION DOES NOT DROP BELOW 50 PPM
AT RINSE. DRAIN SHUR-SAN SOLUTION FROM

ONE QUINCE OF SHUR-SAN IN EACH 7 1/2 GALLONS OF WATER
YIELD APPROXIMATELY 100 PPM AVAILABLE CHLORINE.
LEAVE SOLUTION ON SPRAYED SURFACES
UNTIL COMPLETELY DRY WHERE SPECIFIED BY LOCAL REGULA-
TIONS. DRAIN AND AIR DRY.

USE FOR SANITIZING MECHANICAL OPERA-
TION AT LEAST DAILY OR MORE OFTEN
AS SOILED.

CONCENTRATION TABLE

- 1 gallon - 100 ppm
- 1 gallon - 200 ppm
- 1 gallon - 300 ppm

STORAGE AND DISPOSAL

Use water, food or food by storage or disposal.
Label.

Waste are usually hazardous. Improper
storage or disposal is a violation of Federal Law. If
by use according to label instructions, contact
local Central Agency or the Hazardous Waste
Regional Office for guidance.

Empty empty liner by stretching and tapping sides
into. Empty residue from application equipment.
Wash or by incineration if allowed by State and
local and cannot be reused, dispose of in the

SHUR-SAN

SANITIZING COMPOUND

FORMULATED ESPECIALLY FOR FOOD PROCESSORS

EQUIPMENT IN THE FOOD PLANT SHOULD BE THOROUGHLY
CLEANED AND RINSED AFTER DAILY USE. DISINFECT
EQUIPMENT AFTER USE OR AT TIME SPECIFIED BY LOCAL
REGULATIONS.

Keep out of reach of children.

DANGER

SEE RIGHT PANEL FOR ADDITIONAL CAUTIONS

ACTIVE INGREDIENTS: Sodium dichloro-s-triazetrione 16.5%
 INERT INGREDIENTS: 83.5%
 (AVAILABLE CHLORINE - 10%)

EPA Reg. No. 9152-19

EPA Est. No. 9152-CA-1

ACCEPTED
with 100% compliance
by EPA letter dated

JUN 22 1991

Environmental Health
Administration
Washington, DC

9152-19

KEEP OUT OF REACH OF CHILDREN DANGER—CORROSIVE

Causes eye damage • Causes skin irritation • Harmful if swallowed

STATEMENT OF PRACTICAL TREATMENT

FIRST AID:

If a known exposure occurs or is suspected, immediately initiate the recommended
procedures below. If further treatment is required contact a Poison Control Center, a
physician or the nearest hospital.

In case of contact, hold eyelids apart and flush eyes and skin with plenty of water
for at least 15 minutes, while removing contaminated clothing and shoes. Get
medical attention. Wash clothing before reuse.

If swallowed, do not induce vomiting. Immediately give large quantities of water. If
vomiting does occur, give fluids again. Do not induce vomiting or give anything by
mouth to a unconscious person. Call a physician immediately.

If inhaled, remove to fresh air. Seek medical attention if respiratory irritation
occurs.

PRECAUTIONARY STATEMENTS

HAZARDOUS TO HUMANS & DOMESTIC ANIMALS

DANGER—CORROSIVE

Causes eye damage • Causes skin irritation • Harmful if swallowed
Do not get in eyes, on skin or on clothing. Wear goggles or face shield.
Remove contaminated clothing and wash before reuse. Wash thorough-
ly with soap and water after handling.

SPILL OR LEAK

Sweep up. Place in an appropriate chemical waste container. Flush spill area with
water. Observe all local, state and federal laws and regulations regarding disposal,
spill cleanup, removal or discharge.

Warning: Oxidizing Material—avoid contact with organic materials.
Rinse polyethylene liner after each use and keep container tightly closed.

Store in a dry place. Keep container off wet floors.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Keep out of lakes,
streams or ponds. Treated effluent should be discharged into lakes, streams, ponds
or public waters unless a discharge permit is obtained. For guidance, contact the
regional office of Environmental Protection Agency.

PHYSICAL AND CHEMICAL HAZARDS: STRONG OXIDIZING AGENT:

Mix only with water according to label directions. Mixing this product with grass
such as feces, urine, etc., or other chemicals will release hazardous gases irritating
to eyes, lungs and mucous membranes.

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Morgan-Gallacher, Inc.

SANTA FE SPRINGS, CA 90670

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