



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 7, 2012

Nicole Dauksevicz
Technical Compliance
Alpha Chemical Services, Inc
46 Morton Street
Post Office Box 431
Stoughton, MA 02072

Subject ALPHA SAN 400
 EPA Registration Number 10634-27
 Application Date May 25, 2012
 EPA Receipt Date May 31, 2012

Dear Ms Dauksevicz

The following amendment, submitted in connection with registration under section of the federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted with the following comments

Proposed label amendments

- Add the statement NOT FOR HOME USE FOR FOOD SERVICE AND INSTITUTIONAL USE,
- Revise storage and disposal statement per PR Notice 2007-4 with additional sizes added for marketing

General Comments

- 1 Revise the general first aid information statement or emergency phone number to read

 "For emergency information on (product, use, etc), call the National Pesticides Information Center at 1-800-858-7378, 6 30 AM to 4 30 PM Pacific time (PT), seven days a week During other times, call the poison control center 1-800-222-1222 "
- 2 On page 2, second paragraph, delete the descriptive terms "strong" and "very" from the statement
- 3 Separate the statement pertaining to the *miss use of product* from the instructions and place it directly under the heading to appear as follow

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling

4 In accordance with PR Notice 2000-5, the use of words such as "should" in advisory language can mistakenly imply that an unaccepted use is permissible Therefore on page 2, in the instructions paragraph, change/delete the terms "should, may" and replace it with the term "must "

5 Revise the first claim on the second page pertaining FDA to reflect EPA's indirect food contact regulations FDA no longer has jurisdiction of food contact sanitizer, it is now under EPA purview Therefore revise the citation to read §40 CFR 180 940 (a) (b) (c)

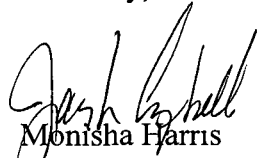
6 Revise the precautionary statement to read as follows

DANGER HIGHLY CORROSIVE Causes irreversible eye damage
Causes burns to skin Irritating to nose and throat May be fatal if swallowed Will burn with the evolution of chlorine and equally toxic gases Do not get in eyes, on skin or on clothing Wear goggles or face shield and rubber gloves when handling Avoid breathing dust or fumes Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet

Submit a copy of the final printed label before selling or distributing the product bearing the revised labeling A copy of the stamped label is enclosed your record

Should you have any questions or comments concerning this letter, please contact Adam Heyward via email at heyward_adam@epa.gov or by telephone at (703) 347-0274 during the hours of 6 00 am to 2 30 pm EST

Sincerely,



Monisha Harris
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure Stamped label

ALPHA SAN 400 has been cleared under the Federal Food Drug and Cosmetic Act for use on food contact surfaces (178 1010(b) (2))

ALPHA SAN 400 can be used in dairies hospitals breweries restaurants and food processing plants It is particularly effective on surfaces which contact food It is recommended for use on hard (non-porous) surfaces or on dishes glasses food processing equipment or utensils including dairy and brewery equipment or utensils that need a strong sanitizer treatment This material is very effective on table tops tanks vats floors walls dishes glasses metallic utensils and milkshake and soft serve machines

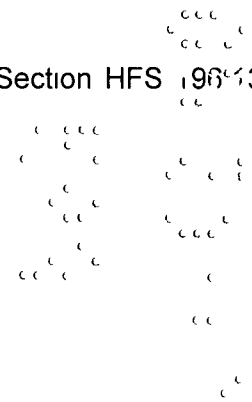
Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling
Clean object to be sanitized with 1 to 2 ounces Alpha San 400 per 2-1/2 gallons of water and rinse well with potable water It may be necessary to remove gross filth and heavy soil from surface by a pre-scrape pre-flush and where necessary a pre-soak treatment Dissolve 1 oz of Alpha San 400 per 2-1/2 gallons of water to give a solution containing 100 ppm available chlorine Apply the sanitizing solution to the surface to be sanitized by immersion or flooding to wet all surfaces thoroughly Let stand at least one minute Drain and air dry The same solution may be used in the feed tanks of immersion type machines providing at least one minute contact time to sanitize dishes glasses food processing equipment and utensils The sanitizing solution should be used promptly after mixing It should be prepared daily or more often if it becomes dilute or soiled If the solution is allowed to stand and/or continued use shows the level of chlorine has not been maintained add more Alpha San 400 to maintain a use solution of 100 ppm available chlorine For mechanical operations the prepared and spent use solutions may not be reused for sanitizing but may be used for other purposes such as cleaning

**WISCONSIN STATE DIVISION OF HEALTH
DIRECTIONS FOR EATING ESTABLISHMENTS**

- 1 Scrape and pre-wash utensils and glasses whenever possible
- 2 Wash with a good detergent or compatible cleaner
- 3 Rinse with potable water
- 4 Sanitize in a solution of 1 ounce of this product per 2-1/2 gallons water (100 ppm active chlorine) Immerse all utensils for at least two minutes or for contact time specified by governing sanitary code
- 5 Place sanitized utensils on a rack or drain board to air-dry

NOTE A clean potable water rinse following sanitization is not permitted under Section HFS 196.13 of the Wisconsin Administrative Code



NOT FOR HOME USE FOR FOOD SERVICE AND INSTITUTIONAL USE

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER!

Highly corrosive Causes irreversible eye damage Causes burns to skin Irritating to nose and throat May be fatal if swallowed Will burn with the evolution of chlorine and equally toxic gases Do not get in eyes on skin or on clothing Wear goggles or face shield and rubber gloves when handling Avoid breathing dust or fumes Wash thoroughly with soap and water after hand-handling Remove and wash contaminated clothing before reuse

ENVIRONMENTAL HAZARD *(For containers of 5 gallons or 50 lbs or more)*

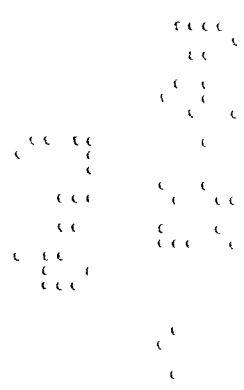
This product is toxic to fish and aquatic organisms Do not discharge effluent containing this product into lakes streams ponds estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority 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

PHYSICAL OR CHEMICAL HAZARD

STRONG OXIDIZING AGENT WILL BURN WITH THE EVOLUTION OF CHLORINE AND EQUALLY TOXIC GASES CONTACT WITH WATER SLOWLY LIBERATES IRRITATING AND HAZARDOUS CHLORINE-CONTAINING GASES DECOMPOSES AT 460 TO 480 DEG F WITH LIBERATION OF HARMFUL GASES
Mix only with water Use clean dry utensils Do not add this product to any dispensing device containing remnants of any other product Such use may cause a violent reaction leading to fire or explosion Contamination with moisture organic matter or other chemicals may start a chemical reaction with generation of heat liberation of hazardous gases and possible generation of fire and explosion

IN CASE OF FIRE If possible isolate container in open air or well-ventilated area Flood with large volume of water

IN CASE OF CONTAMINATION OR DECOMPOSITION Do not reseal container



STORAGE AND DISPOSAL

Do not contaminate water food or feed by storage or disposal

PESTICIDE STORAGE Store in original container Store in a cool dry area away from direct sunlight or heat
In case of spill flood area with large quantities of water

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

CONTAINER DISPOSAL

(For packets only) Nonrefillable container Do not reuse or refill this container Completely empty packet by shaking and tapping sides and bottom to loosen clinging particles Empty residue into application equipment Wrap empty packet and put in trash

(For plastic containers less than 50 lb only) Nonrefillable container Do not reuse or refill this container Completely empty container by shaking and tapping sides and bottom to loosen clinging particles Empty residue into application equipment Triple rinse as follows Fill the container 1/4 full with water and recap Shake for 10 seconds Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal Drain for 10 seconds after the flow begins to drip Repeat this procedure two more times Offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or if allowed by state and local authorities by burning If burned stay out of smoke

(For plastic container or fiber drum with liner greater than or equal to 50 lb only) Nonrefillable container Do not reuse or refill this container Completely empty liner/bag by shaking and tapping sides and bottom to loosen clinging particles Empty residue into application equipment When completely empty offer for recycling if available or dispose of liner/bag in a sanitary landfill or by incineration of if allowed by state and local authorities by burning If burned stay out of smoke If drum is contaminated and cannot be reused dispose of it in the manner required for its liner

