

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



## United States Environmental Protection Office of Pesticide Programs Agency

FEB 23 2010

Cheryl Wagner Agent for Midlab, Inc. Wagner Regulatory Associates, Inc. 7460 Lancaster Pike Suite 9 Hockessin, DE 19707

Subject:

Bright Pack CL-25 Alkaline Sanitizer EPA Registration No. 45745-10 Application Date: January 28, 2010 EPA Receipt Date: February 1, 2010

Dear Ms. Wagner:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions below.

#### **Proposed Amendment:**

Label Amendment

#### **Conditions:**

Revise the label as follows:

1. Add the primary brand name to the label so that the product heading reads as follows:

Bright Pack CL-25 Alkaline Sanitizer [ABN: CL-25 Alkaline Sanitizer]

- 2. Revise the ingredient statement by adding the word "dehydrate" to the end of the active ingredient name.
- 3. Revise the "If Inhaled" section of the First Aid Statements by deleting the "s" from the word "respirations" and by adding the statement "Call a poison control center or doctor for further treatment advice."
- 4. Revise the net contents on page 1 to read "NET CONTENTS: 200- ¼ oz. packets" ensuring consistency with the net contents statement on page 4.
- 5. Although, this product is used exclusively indoors, the proposed container disposal language is acceptable for household/residential products only. Revise the Container Disposal section as follows:

#### **Container Disposal**

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ 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.

#### **General Comments:**

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

Should you have any questions concerning this letter, please contact me at <u>Henson.Wanda@epa.gov</u> or call (703) 308-6345.

Sincerely,

Wanda Henson

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

## CL-25 Alkaline Sanitizer

with COMMENTS

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Sodium Dichloro-s-triazinetrione

INERT INGREDIENTS

TOTAL INGREDIENTS

### **KEEP OUT OF REACH OF CHILDREN DANGER**

FIRST AID						
If Swallowed	-Call a poison control center or doctor immediately for treatment adviceHave person sip a glass of water if able to swallow.					
	-Do not induce vomiting unless told to do so by a poison control center or doctorDo not give anything by mouth to an unconscious person.					
If on skin or	-Take off contaminated clothing.					
clothing	-Rinse skin immediately with plenty of water for 15-20 minutes.					
	-Call a poison control center or doctor for treatment advice.					
If In Eyes	-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 continuing rinsing eyeCall a poison control center or doctor for treatment advice.					
If Inhaled	-Move person to fresh airIf person is not breathing, call 911 or an ambulance, then give artificial respirations, preferably mouth-to-mouth if possible.					
Note to physician: Probable mucosal damage may contraindicate the use of gastric lavage.						
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.						
Emergency Number						
For 24-hour medical emergency assistance call 1-800-535-5053.						

See side panel for Directions for use

CL-25 Alkaline Sanitizer has been cleared under the Federal Food, Drug and Cosmetic Act for use on food contact surfaces [178.1010(b)(2)].

**EPA REG. NO. 45745-10** EPA EST. NO. 45745-TN-1 MIDLAB, INC. 232 INDUSTRIAL PARK ROAD **SWEETWATER, TN 37874** 

**NET CONTENTS: 1/4 oz.** 

# PRECAUTIONARY STATEME...S HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Causes skin irritation. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe dust. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

#### PHYSICAL OR CHEMICAL HAZARD

**STRONG OXIDIZING AGENT.** Contact with water slowly liberates irritating and hazardous chlorine containing gases. Decomposes at 460°F to 480°F with liberation of harmful gases. Will burn with the evolution of chlorine and equally toxic 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 material, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible fire and explosion.

#### IN CASE OF FIRE:

If possible, isolate container in open air or well ventilated area. Flood with large volumes 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 DISPOSAL:** Wastes of this pesticide may cause irreversible eye damage and burns to skin and may be dangerous. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed 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:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

#### **DIRECTIONS FOR USE**

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

Use CL-25 Alkaline Sanitizer in hospitals, restaurants, breweries, dairies and food processing plants. Use CL-25 Alkaline Sanitizer on hard (non-porous) surfaces, on dishes, glasses, or food processing equipment or utensils including dairy and brewery equipment or utensils.

Clean object to be sanitized with a suitable hard surface cleaner and rinse well with potable water. It may be necessary to remove gross filth and heavy soil from surface by pre-scrape, pre-flush and where necessary, a pre-soak treatment.

Dissolve 1 pack (1/4 oz.) of CL-25 Alkaline Sanitizer 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, flooding, or spraying to wet all surfaces thoroughly. Let stand at least one minute. Drain and air dry.

Use the same solution in the feed tanks of immersion or spray type machines providing at least one minute contact time to sanitize dishes, glasses, food processing equipment and utensils.

Use the sanitizing solution promptly after mixing. Prepare the sanitizing solution 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 CL-25 Alkaline Sanitizer to maintain a use solution of 100 ppm available chlorine.

For mechanical operations, do not reuse the prepared and spent use solution for sanitizing. The used and spent solution can be used for other purposes such as cleaning.

#### 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 a suitable hard surface cleaner and rinse well with potable water. It may be necessary to remove gross filth and heavy soil from surface by pre-scrape, pre-flush and where necessary, a pre-soak treatment.

Dissolve 1 pack (1/4 oz.) of CL-25 Alkaline Sanitizer 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, flooding, or spraying to wet all surfaces thoroughly. Let stand at least one minute. Drain and air dry.

Use the same solution in the feed tanks of immersion or spray type machines providing at least one minute contact time to sanitize dishes, glasses, food processing equipment and utensils.

Use the sanitizing solution promptly after mixing. Prepare the sanitizing solution 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 CL-25 Alkaline Sanitizer to maintain a use solution of 100 ppm available chlorine.

For mechanical operations, do not reuse the prepared and spent use solution for sanitizing. The used and spent solution can be used for other purposes such as cleaning.

#### CL-25 Alkaline Sanitizer

#### **ACTIVE INGREDIENT:**

Sodium Dichloro-s-

triazinetrione......25.00%

INERT INGREDIENTS ..... ....75.00% TOTAL INGREDIENTS ..... 100,00%

**Provides 14% Available Chlorine** 

## KEEP OUT OF REACH OF CHILDREN DANGER

#### **FIRST AID**

#### if Swallowed:

- -Call a 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 a poison control center or doctor.
- -Do not give anything by mouth to an unconscious person.

#### If on skin or clothing:

- -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 In Eves:

-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 continuing rinsing eye.

-Call a poison control center or doctor for treatment advice.

#### If Inhaled:

- -Move person to fresh air.
- -if person is not breathing, call 911 or an ambulance, then give artificial respirations, preferably mouth-to-mouth if possible

**Note to physician:** Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Emergency Number

For 24-hour medical emergency assistance call 1-800-535-5053.

See side panel for Directions for use

CL-25 Alkaline Sanitizer has been cleared under the Federal Food, Drug and Cosmetic Act for use on food contact surfaces [178.1010(b)(2)].

EPA REG. NO. 45745-10 EPA EST. NO. 45745-TN-1 MIDLAB, INC.

232 INDUSTRIAL PARK ROAD SWEETWATER, TN 37874

NET CONTENTS: 200 - 1/4 oz. packets

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

DANGER. Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Causes skin irritation. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe dust. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

## PHYSICAL OR CHEMICAL HAZARD

#### STRONG OXIDIZING AGENT.

Contact with water slowly liberates irritating and hazardous chlorine containing gases. Decomposes at 460°F to 480°F with liberation of harmful gases. Will burn with the evolution of chlorine and equally toxic 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 material, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible 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 DISPOSAL: Wastes of this pesticide may cause irreversible eye damage and burns to skin and may be dangerous. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed 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: Nonrefillable container. Do not reuse or refill this container. Offer

for recycling if available.

#### **PACKET LABEL**

#### **DIRECTIONS FOR USE**

See Outer Container for Additional Directions for Use

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

Dissolve 1 packet (1/4 oz.) of CL-25 Alkaline Sanitizer per 2 ½ gallons of water to give a solution containing 100 ppm available chlorine.

CL-25 Alkaline Sanitizer

ACTIVE INGREDIENT: Sodium Dichloro-striazinetrione......25.00%

INERT INGREDIENTS ..... 100.00%

Provides 14% Available Chlorine

KEEP OUT OF REACH OF CHILDREN DANGER

EPA REG. NO. 45745-10 MIDLAB, INC. EPA EST. NO. 45745-TN-1 232 INDUSTRIAL PARK ROAD SWEETWATER, TN 37874

**NET CONTENTS: 1/4 oz.** 

CONTAINER DISPOSAL:

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.