

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV - 8 2010

Ju Choi Shepard Bros., Inc. 503 S. Cypress St. La Habra, CA 90631

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Subject:

Alas - 478

EPA Registration No. 50600-12 Application Date: July 30, 2010 EPA Receipt Date: August 10, 2010

Dear Mr. Choi,

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

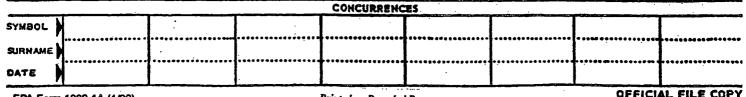
Proposed Amendment

Remove residue removal statement from food contact sanitizing directions

Conditions

Revise the label as follows:

- 1. Revise the "User Safety Recommendations" section to be incompliance with PR Notice 2000-5, Mandatory Labeling, by deleting the term, recommendations, and stating "instructions." Also, delete should and state "must."
- 2. Revise the "If on skin, clothes" subheading under the "First Aid" statements to read "If on skin or clothing".
- 3. Revise the "DOT proper shipping name" by deleting "organic" and stating "Inorganic" per the product's last stamped label dated September 23, 2003.
- 4. Move the "Personal Protective Equipment (P.P.E.)" statements to appear immediately after the Precautionary Statements.



EPA Form 1320-1A (1/90)

Printed on Recycled Paper

IITED STATES ENVIRONMENTAL PROT

General Comments

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 concerning this letter, please contact me at Cambellmcfarlane.jacqueline@epa.gov or call (703) 308-6416.

Sincerely,

Product Manager (34)

Regulatory Management Branch II Antimicrobials Division (7510P)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CORROSIVE: Causes irreversible eve damage or skin burns. Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no instructions exist for washable items, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard dothing or other materials that have been drenched or heavily contaminated with a concentrate of this product. Do not reuse them.

USER SAFETY RECOMMENDATIONS
User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove PPE immediately after handling this

product. Wash outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. Users should remove clothing immediately, if pesticide gets inside. Then wash thoroughly and put on clean clothing

PHYSICAL AND CHEMICAL HAZARDS

Do not mix with caustic or alkaline cleaners as violent boiling and spattering may result. Do not add ALAS - 478 to hypochlorite bleaches, chlorine sanitizers or chlorinated cleaners as this liberates toxic, corrosive, chlorine gas,

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into takes, 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

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL

PESTICIDE STORAGE:

Keep container tightly closed when not in use. If contents are spilled or leaked due to container damage, collect liquid with absorbent material and dispose of in accordance with local state, and federal pesticide disposal regulations. 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 the label instructions, contact your state pesticide or environmental control atgency, or the hazardous waste representative at the nearest EPA Regional Office or guidance. CONTAINER DISPOSAL:

Nonrefillable container. Do not reuse or refill this container Offer for recycling, if available. Triple rinse container (o

equivalent) promptly after emptying. Containers 5 gallons or less: 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 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. Containers greater than 5 gattons: Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth,

ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal Repeat this procedure two more times.

ALAS - 478

ACID-ANIONIC SANITIZER AND CLEANER FOR USE ON ALL HARD NONPOROUS SURFACES

ACTIVE INGREDIENTS:	
	30 00%
Phosphoric Acid C ₍₁₀₋₁₆₎ Alkylbenzene Sulfonic Acid	25.60%
INERT INGREDIENTS:	
TOTAL	

KEEP OUT OF REACH OF CHILDREN DANGER!

See Additional Precautions On Side Panel FOR INDUCTORAL LICE ONLY

F	OR INDUSTRIAL USE ONLY
FIRST AID	
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 continue rinsing eye.
	Call a poison control center or doctor for additional treatment advice.
lf on skin,	Take off contaminated clothing.
clothes:	 Rinse skin immediately with plenty of water for 15 - 20 minutes.
• Call	Call a poison control center or doctor for treatment advice.
lf	Call a poison control center or doctor
swallowed:	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 inhaled:	Move person to fresh air.
ii iiiiiiiiiiiiii	• If person is not breathing, call 911 or an

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

ambulance, then give artificial respiration,

preferably by mouth-to-mouth, if possible.

HOTLINE NUMBER: Have the product or label with you when calling a poiso control center or doctor, or going for treatment. You may also contact (562) 697-1366 or Chemtrec at 1-800-424-9300 for emergency medical treatment information.

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call The National Pesticide Telecommunications Network at 1-800-858-7378

NOTE TO PHYSICIAN:

Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No. 50600-12

EPA Est. 50600-CA-01



Manufactured By: Shepard Bros.

503 S. Cypress St. **SB** La Habra, CA 90631

(562) 697-1366

(800) 645-3594

DIRECTIONS FOR USE

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

GENERAL PRECAUTIONS AND RESTRICTIONS: Do not apply this product in a way that will contact workers or other persons. Only protected handlers may be in the area during application.

ALAS - 478 is an excellent liquid acid anionic cleaner and sanitizer. It is effective against gram positive and gram negative bacteria (Staphylococcus aureus Pseudomonas aeruginosa and Escherichia coli) at 1 - 2 fl. oz. per 10 gallons of water (200 - 400 ppm active anionic sanitizer) on stainless steel, painted steel, plastic, and tile surfaces.

ALAS - 478 is effective against Listeria monocytogenes at 1 - 2 fl. oz. per 10 gallons of water on stainless steel. plastic, and painted steel surfaces. For tile or similar surfaces, 1 fl. oz. of ALAS - 478 per 5 gallons of water (400 ppm active anionic sanitizer) is required.

ALAS - 478 passes the A.O.A.C. Germicidal and Detergent Sanitizing Tests for food contact surface sanitizers at concentration of 1 fl. oz. ALAS - 478 per 10 gallons of water.

GENERAL CLEANING INSTRUCTIONS

FOAM CLEANING: Use 1 to 2 quarts of ALAS - 478 per each 50 gallon foam charge of warm (100 - 110°F) water. Allow the foam a contact time of 5 minutes, then rinse thoroughly with potable water.

MANUAL CLEANING: Add 1 to 2 fl. oz. of ALAS - 478 per each gallon of warm (100 - 110°F) water. Scrub or brush on thoroughly to clean all surfaces, then rinse with potable water.

MINERAL FILM REMOVAL: Use 3 to 4 fl. oz. of ALAS - 478 per each gallon of warm (100 - 110°F) water. Apply to surfaces by manual procedures or by mechanical foam apparatus and allow a contact time of 5 minutes. Rinse thoroughly with potable water.

DOT PROPER SHIPPING NAME: CORROSIVE LIQUIDS, ACIDIC, ORGANIC, N.O.S., (DODECYLBENZENE SULFONIC ACID. PHOSPHORIC ACID), 8, UN3265, PGII

BATCH NUMBER:

NET CONTENTS: 575 LBS

SANITIZING INSTRUCTIONS

DAIRY, ICE CREAM AND CHEESE PLANT SANITIZING: For tank trucks, holding tanks, vats and plant equipment, use 1 - 2 fl. oz. of ALAS - 478 per each 10 gallons of water (200 - 400 ppm active anionic sanitizer) applied by spray or brush after a thorough cleaning process and potable water rinse. Allow a sanitizer contact time of at least 2 minutes, then drain thoroughly and air dry

To eliminate Listeria monocytogenes, use 1 fl. oz. of ALAS - 478 per each 5 gallons of water (400 ppm active anionic sanitizer) applied by spray or brush after a thorough cleaning process and potable water rinse. Allow a sanitizer contact time of at least 2 minutes, then drain thoroughly and air dry.

BACTERIOPHAGE CONTROL, CHEESE PLANTS: After a thorough cleaning and rinse with potable water. sanitize all cheese equipment with an ALAS - 478 solution containing 1 - 2 fl. oz. of ALAS - 478 per each 10 gallons of water (200 - 400 ppm active anionic sanitizer). Allow a two-minutes sanitizer contact time. then drain the solution from the equipment.

Using the appropriate equipment, wet spray to cover all surfaces with an ALAS - 478 solution containing 1 fl. oz. of ALAS - 478 per each 5 gallons of water (400 ppm active anionic sanitizer). After all surfaces are covered. close the rooms and allow to stand overnight.

ACIDIFIED RINSE, CIP SANITIZING, DAIRY PLANTS: Following a thorough cleaning procedure and final rinse with potable water, prepare a 1 - 2 fl. oz. of ALAS - 478 per each 10 gallons of water (200-400 ppm active anionic sanitizer) solution and pump it through the lines for at least 2 minutes. Do not circulate. Drain the sanitizer solution from the lines allowing thorough drainage

RESTAURANT AND INSTITUTIONAL ESTABLISHMENT SANITIZING

- 1. Scrape/pre-wash plates, utensils, cups, glasses whenever possible.
- 2. Wash all items with good detergent.
- 3. Rinse thoroughly with potable water.
- 4. Sanitize in an ALAS 478 solution containing 1 2 fl. oz. of ALAS - 478 per each 10 gallons of water (200 - 400 ppm active anionic sanitizer). Immerse all items for at least 2 minutes or for a contact time specified by the local governing sanitizino code.
- 5. Place all sanitized items on a rack or drainboard to air dry

FOR USE IN DAIRY FARM SANITIZING

BULK MILK COOLING TANKS: Prior to filling with milk. sanitize the tank with a 1 - 2 fl. oz. of ALAS - 478 per each 10 gallons of water (200 - 400 ppm active anionic sanitizer) solution by brush or spray method. Allow a sanitizer contact time of at least 2 minutes, then drain thoroughly and air dry

ACCEPTED with COMMENTS EPA Letter Dated:

NOV - 8 2010

Under the Federal Insecticide, Fungicide, and Remembede Act as amended for the pesticide, registered under EPA Reg. No. 50 600-12

DAIRY FARM UTENSILS: Prior to milking, sanitize the utensils with an ALAS - 478 solution (1 - 2 fl. oz. per each 10 gallons of water) by a rinse spray, immersion, or brush method. Allow a 2 minute sanitizer contact time, then drain thoroughly and air dry.

INFLATIONS: Brush inflations after milking with a warm (100 - 120°F) ALAS - 478 solution containing 1 - 2 fl. oz. of ALAS - 478 per each 10 gallons of water (200 - 400 ppm active anionic sanitizer), using a good inflation brush. Rinse throroughly with potable water and store as directed by sanitarians or service personnel. Prior to milking, sanitize with an ALAS - 478 solution, 1 - 2 fl. oz. per 10 gallons of water (200 - 400 ppm active anionic sanitizer). Allow a contact time of 2 minutes, then drain thoroughly and air dry.

BEVERAGE PLANT SANITIZING

CIP LINES, CLOSED SYSTEMS: Prepare a 1 - 2 fl. oz. of ALAS - 478 per 10 gallons of water (200 - 400 ppm active anionic sanitizer) solution and pump it through the lines for at least 2 minutes to sanitize . circulate. Thoroughly drain the solution from th

PRE-MIX & POST-MIX VENDING MACHINES: JOW directions of the manufacturer and use a 1 - 2 fl oz of ALAS - 478 per 10 gallons of water (200 - 400 ppm active anionic sanitizer) solution. Allow a sanitizer contact time of 2 minutes, drain throughly and air dry.

GLASSWARE & BOTTLE SANITIZING: Following a thorough cleaning procedure with a final potable water rinse, use 1 - 2 fl. oz. of ALAS - 478 per 10 gallons of water (200 - 400 ppm active anionic sanitizer) solution by spray or dip method. Allow a contact time of 2 minutes, then drain throughly and air dry.

MEAT, POULTRY PLANT, AND POULTRY PREMISES SANITIZING

CIP AND GIBLET LINES: Following a thorough cleaning and potable water rinse, sanitize by using a 1 -2 fl: oz. of ALAS - 478 per 10 gallons of water (200 -400 ppm active anionic sanitizer) solution by pumping this solution through the lines for 2 minutes, then drain

PROCESSING EQUIPMENT, UTENSILS, AND POULTRY PREMISES: After a thorough cleaning and potable water rinse, sanitize by using a 1 - 2 fl. oz. of ALAS - 478 per 10 gallons of water (200 - 400 ppm active anionic sanitizer) solution by a spray or brush method. Allow a 2 minute contact time, then drain and air drv.

CONCRETE OR TILE FLOORS AND WALL! foam cleaning and rinse procedure, sanitize by applying a 1 fl. oz. of ALAS - 478 per 5 gallons of water (400 ppm active anionic sanitizer) solution. Allow a 2 minute contact time, then drain and air dry.

PERSONAL PROTECTIVE EQUIPMENT (P.P.E.) Applicators and other handlers must wear:

- Coveralls over long-sleeved shirt and long pants Socks and chemical-resistant footwear
- Goggles and face shield
- Chemical-resistant apron
- Chemical-resistant gloves (such as barrier laminate. butyl rubber, nitrile rubber, neoprene rubber, PV, or viton)

Effective Date: 07/26/2010