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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAR 5 2014

Susan Stracquatano
Specialty Chemicals & Systems, Inc.
c/o Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: LTS Sanitizer
EPA Reg. No. 61647-1
Application Date: January 24, 2014
Receipt Date: January 27, 2014

Dear Ms. Stracquatano:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification:

To update the Storage and Disposal per PR Notice 2007-4

General Comments:

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable and a copy has been inserted in your file for future reference.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Wanda Y. Henson".

Wanda Y. Henson (Team 32)
Environmental Protection Specialist
Regulatory Management Branch II
Antimicrobials Division (7510P)

United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number
NOTIFICATION

Application for Pesticide - Section I

1. Company/Product Number 61647-1	2. EPA Product Manager: Demson Fuller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product Name LTS Sanitizer	PM#: 32	
5. Name and Address of Applicant (Include Zip Code) Specialty Chemicals & Systems, Inc. c/o Delta Analytical Corporation 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <input checked="" type="checkbox"/> Check if this is new address		6. Expedited Review. In accordance with FIFRA Sec. (3)(c)(3)(b)(i), my product is similar or identical in composition and labeling to :

Section II

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated:	<input type="checkbox"/> "MeToo" Application
<input checked="" type="checkbox"/> Notification	<input type="checkbox"/> Other - Explain Below

Explanation: Use additional page(s) if necessary. (For sections I and II.)
Notification per PR Notice 2007-4 to update the Storage and Disposal language.

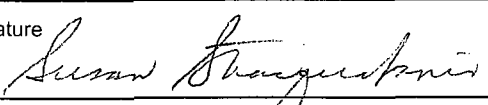
Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

1. Material This Product Will Be Packaged In :					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Certification must be submitted	Unit Packaging <input type="checkbox"/> yes <input checked="" type="checkbox"/> no		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other: (Specify)
	If Yes, Unit packaging weight	No. per container	If Yes, package weight	No. per container	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container 1 gal., 5 gal.			5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in which Label is affixed to product: <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other					

Section IV

1. Contact Point		
Name Susan Stracquatano	Title: Agent, Specialty Chemicals & Systems, Inc.	Telephone No.: 301-680-7971

Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		Date Application Received (Stamped)
2. Signature 	3. Title: Agent, Specialty Chemicals & Systems, Inc.	
4. Typed Name Susan Stracquatano	5. Date January 24, 2014	



January 24, 2014

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Demson Fuller, PM #32

Re: **Notification of Update to Storage and Disposal Section of Label per PR Notice 2007-4 and in Response to Agency letter of December 9, 2013**

Company: Specialty Chemicals & Systems, Inc.
Product: LTS Sanitizer
EPA Reg. No.: 61647-1

Dear Mr. Fuller:

On behalf of Specialty Chemicals & Systems, Inc., I am submitting a notification per PR Notice 2007-4 to update the Storage and Disposal statement of LTS Sanitizer, EPA Reg. No. 61647-1.

Specialty Chemicals & Systems, Inc. received a stop sale order for this product when EPA found that LTS Sanitizer labels did not include language identifying container type as required by 40 CFR §156.140(a). The Storage and Disposal statement of the label has been updated following the guidance found in Chapter 13 of the Label Review Manual. The addition of the container language as required in EPA's order is the only change made to this label. The revision is highlighted.

Under separate cover, I am also submitting an amendment to the label that updates the Hazards to Humans and Domestic Animals Precautionary Statement. This change is being put in a separate submission in order to get LTS Sanitizer back on the market as quickly as possible by addressing the mandated change by notification first.

Enclosures:

- Agent letter
- Application for Pesticide Registration (EPA Form 8570-1);
- Revised product label, two copies, one with revisions highlighted plus one on CD
- EPA letter of December 9, 2013

If you have any questions regarding this submission, you may contact me at ssracquatanio@delta-ac.com or (301) 680-7971.

Sincerely,

Susan Stracquatano, Agent
Specialty Chemicals & Systems, Inc.

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LTS SANITIZER

ACTIVE INGREDIENT - SODIUM HYPOCHLORITE	5.25%
OTHER INGREDIENTS	94.75%
TOTAL	100.00%

Contains 5% available chlorine by weight

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID	
Call a poison control center or doctor immediately for treatment advice. Have the product container or label with you when you call a poison control center or doctor, or when going for treatment.	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first five minutes, then continue rinsing eye.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes
If swallowed	<ul style="list-style-type: none"> • 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 a doctor. • Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER	
You may contact the Poison Center at 1-800-222-1222 for emergency medical treatment information.	
NOTE TO PHYSICIAN - Probable mucosal damage may contraindicate the use of gastric lavage.	

See other precautions on this label.

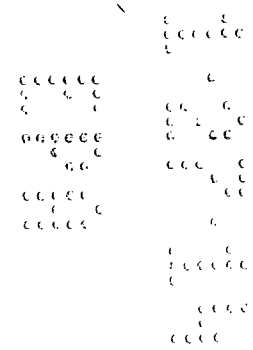
EPA Reg. No. 61647-1

EPA Est. No. 61647-CO-001

Distributed by:

Specialty Chemicals & Systems, Inc.
4650 Leyden St., Unit A
Denver, Colorado 80216

Net Contents: Gallons



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Eye contact can cause severe irritation, eye damage, even blindness. Skin contact can cause severe irritation, burns. Inhalation can cause severe irritation, pneumonia, lung damage, even death. Ingestion can cause severe irritation, ulceration, coma, even death.

Wear safety glasses or goggles or face mask and rubber gloves. Do not get in eyes, on skin, or clothing. Do not breathe vapor, mist or gas. Use only with adequate ventilation. Vacate poorly ventilated areas as soon as possible. Do not return until strong odors have dissipated. Wash thoroughly after handling.

ENVIRONMENTAL HAZARDS

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 AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT: Mix only with water according to label directions. Mixing this product with chemicals (e.g. ammonia, acids, detergent, etc.) or organic matter (e.g. urine, feces, etc.) will result in the release of hazardous gases which are irritating to eyes, lungs and mucous membranes.

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 required level of available chlorine.

MEAT AND POULTRY PROCESSING PLANTS - Surfaces or articles to be sanitized must be thoroughly precleaned. Solutions containing 600 ppm available chlorine by weight (15 oz. sodium hypochlorite solution per 10 gallons water) may be used for sanitizing walls, floors, ceilings and similar areas. Maintain contact with sanitizer for at least 2 minutes. Do not rinse after sanitizing. Solutions containing 200 ppm available chlorine (5 oz. sodium hypochlorite solutions per 10 gallons water) may be used on edible product equipment. Maintain contact time with sanitizer for at least 2 minutes. Do not rinse after sanitizing. Do not allow the solution to come directly in contact with meat or poultry.

DRINKING WATER DISINFECTION - Sodium hypochlorite solution may be used to disinfect water supplies. Mix a ratio of 4 oz. of this product to 2000 gallons water. Begin feeding this solution with a hypochlorinator until a free available chlorine residual of at least 0.2 ppm and no more than 0.6 ppm is attained throughout the distribution system. Check water frequently with a chlorine test kit. Bacteriological sampling must be conducted at a frequency not less than that prescribed by the National Primary Drinking Water Regulations. Contact your local Health Department for further details.

RESTAURANTS AND TAVERNS - After washing with dishwashing detergent and rinsing with clean water, immerse utensils in sanitizing solution prepared by adding 5 oz. of this product with 10 gallons of water to provide 200 ppm available chlorine by weight. Maintain contact with sanitizer for at least 2 minutes and allow sanitizer to drain. Do not rinse utensils with water after treatment.

MACHINE DISHWASHING TERMINAL RINSE SANITATION - As a terminal sanitizing for pre-cleaned food utensils, adjust automatic dispensing equipment to provide a sanitizing use solution of 100 to 200 ppm available chlorine by weight according to requirements of Public Health Authorities. Use solution

should be tested frequently with a suitable chlorine test kit to ascertain that the rinsate strength does not fall below 50 ppm. In absence of a test kit a starting concentration of 200 ppm should be used. Do not rinse utensils with water after treatment.

SWIMMING POOL WATER DISINFECTION - For a new pool or spring start-up, superchlorinate with 122 to 244 oz. of product for each 10,000 gallons of water to yield 5 to 10 ppm available chlorine by weight. Check the level of available chlorine with a test kit. Adjust and maintain pool water pH to between 7.2 to 7.6. Adjust and maintain alkalinity of the pool to between 50 to 100 ppm.

To maintain the pool, add manually or by a feeder device, 24.5 oz. of this product for each 10,000 gallons of water to yield an available chlorine residual between 0.6 to 1.0 ppm by weight. Stabilized pools should maintain a residual of 1.0 to 1.5 ppm available chlorine. Test the pH, available chlorine residual and alkalinity of the water frequently with appropriate test kits. Frequency of water treatment will depend upon temperature and number of swimmers.

Every 7 days, or as necessary, superchlorinate the pool with 122 to 244 oz. of product for each 10,000 gallons of water to yield 5 to 10 ppm available chlorine by weight. Check the level of available chlorine with a test kit. Do not re-enter pool until the chlorine residual is between 1.0 to 3.0 ppm.

At the end of the swimming pool season or when water is to be drained from the pool, chlorine must be allowed to dissipate from treated pool water before discharge. Do not chlorinate the pool within 24 hours prior to discharge.

WINTERIZING POOLS - While water is still clear & clean, apply 7.5 oz. of product per 1,000 gallons, while filter is running, to obtain a 3 ppm available chlorine residual, as determined by a suitable test kit. Cover pool, prepare heater, filter and heater components for winter by following manufacturers' instructions.

STORAGE AND DISPOSAL

Storage: Do not contaminate food or feed by storage, disposal or cleaning of equipment. Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water.

Pesticide Disposal: Product or rinsates that cannot be used must be diluted with water before disposal in a sanitary sewer.

Container Handling:

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple Rinse as follows: Fill container ¼ full with water and recap. Shake for 10 seconds. Drain for 10 seconds after the flow begins to drip. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times. Offer for recycling if available or reconditioning if appropriate or place in trash.

[for alternate language for refillable containers:]

Refillable container. Refill this container with sodium hypochlorite only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times. Offer container for recycling if available or reconditioning if appropriate or place in trash.