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06/19/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

JUN 19 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms Abigail Downs
Agent for Packers Chemical Inc
1150 18th Street NW Suite 1000
Washington D C 20036

Subject KC 615
EPA Registration No 63679 1
Application Date 05/16/2012
Receipt Date 05/17/2012

Dear Ms Downs

The following amendment submitted in connection with registration under FIFRA as amended is acceptable

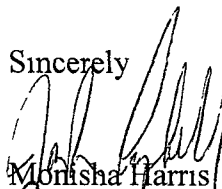
Proposed Amendment

- Update of precautionary statements

General Comments

A stamped label is enclosed for your records Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling Should you have any questions or comments concerning this letter you may contact Jaclyn Carl by telephone at (703) 347 0213 or by e mail at carl.jaclyn@epa.gov When submitting information or data in response to this letter a copy of this letter should accompany the submission to facilitate processing

Sincerely


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

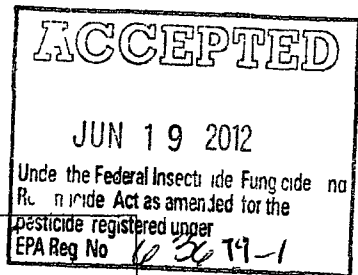
KC-615

ACTIVE INGREDIENT
SODIUM HYPOCHLORITE
OTHER INGREDIENTS
TOTAL

12 5%
87 5%
100 0%

AVAILABLE CHLORINE 11 9%

KEEP OUT OF REACH OF CHILDREN
DANGER



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 treatment advice

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 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 poison control center or doctor
Do not give anything by mouth to an unconscious person

IF INHALED

Move person to fresh air
If person is not breathing call 911 or an ambulance then give artificial respiration preferably by mouth to mouth if possible
Call a poison control center or doctor for further treatment advice

Have the product container or label with you when calling a poison control center or doctor or going for treatment **NOTE TO PHYSICIAN** Probable mucosal damage may contraindicate the use of gastric lavage

FOR ALL ACCIDENTS, CALL CHEMTREC AT 1 800 424 9300

See Side Panel for Additional Precautionary Statements

EPA REG NO 63679 1 EPA EST NO 63679 WI 001

Manufactured for
Packers Chemical Inc
3729 Peddle Hollow Rd
Kieler WI 53812

CONTENTS _____

BATCH _____

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive

Causes irreversible eye damage and skin burns Do not get in eyes on skin or on clothing Wear long sleeved shirt pants safety glasses or goggles and rubber gloves when handling this product Wash thoroughly with soap and water after handling and before eating drinking chewing gum using tobacco or using the toilet Avoid breathing vapors Vacate poorly ventilated areas as soon as possible Do not return until strong odors have dissipated Remove and wash contaminated clothing before reuse

PHYSICAL OR CHEMICAL HAZARDS

Strong oxidizing agent Mix only with water according to label directions Mixing this product with chemicals (e g ammonia acids detergents etc) or organic matter (e g urine feces etc) will release chlorine gas which is irritating to eyes lungs and mucous membranes

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms Do not discharge effluent containing this product into lakes ponds streams 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 and disposal

Pesticide Storage Store in a closed container in cool dry area away from heat and sunlight to avoid deterioration In case of spill isolate container (if possible) and flood area with large amounts of water to dissolve all material before discarding this container (if practicable) in trash **Emergency Handling** In case of contamination or decomposition do not reseal container Isolate in open well ventilated area and flood with large volume of water Cool unopened containers in vicinity by water spray

Pesticide Disposal Pesticide wastes may be 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 EPA Regional Office for guidance

Container Handling

Nonrefillable rigid container Do not re use or refill this container Triple rinse as follows Empty the remaining contents into application equipment or a mix tank Fill the container / 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 disposal in a sanitary sewer or other approved disposal facility Repeat this procedure two more times **Then offer for recycling or reconditioning or puncture and dispose of in trash or in a sanitary landfill or incineration or if allowed by state and local authorities by burning If burned stay out of smoke**

Refillable rigid container Refill this container with this product only Do not reuse this container for any other purpose Refill with bleach or triple or pressure rinse empty tank car or tank truck to remove bleach residues before refilling with this product Cleaning before refilling the tank car or tank truck is the responsibility of the refiller

CLEANING FORMULATIONS BLEACHING & NON PESTICIDE CHEMICAL MANUFACTURING This product may be used for cleaning formulations bleaching and non pesticidal chemical manufacturing Specifically designed handling and dispensing equipment must be used in accordance with manufacturer s instructions and according to operating instructions for product formulations defined by the use facility

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 the required level of available chlorine

SANITIZATION OF NONPOROUS FOOD CONTACT SURFACES

RINSE METHOD A solution of 100 ppm available chlorine may be used in the sanitizing solution if a chlorine test kit is available Solutions containing an initial concentration of 100 ppm available chlorine must be tested and adjusted periodically to insure that the available chlorine does not drop below 50 ppm Prepare a 100 ppm sanitizing solution by thoroughly mixing 1 oz of this product with 10 gallons of water If no test kit is available prepare a sanitizing solution by thoroughly mixing 2 oz of this product with 10 gallons of water to provide approximately 200 ppm available chlorine by weight

Clean equipment surfaces in the normal manner Prior to use rinse all surfaces thoroughly with the sanitizing solution maintaining contact with the sanitizer for at least 2 minutes If solution contains less than 50 ppm available chlorine as determined by a suitable test kit either discard the solution or add sufficient product to reestablish a 200 ppm residual Do not rinse equipment with water after treatment and do not soak equipment overnight Sanitizers used in automated systems may be used for general cleaning but may not be reused for sanitizing purposes

IMMERSION METHOD A solution of 100 ppm available chlorine may be used in the sanitizing solution if a chlorine test kit is available Solutions containing an initial concentration of 100 ppm available chlorine must be tested and adjusted periodically to insure that the available chlorine does not drop below 50 ppm Prepare a 100 ppm sanitizing solution by thoroughly mixing 1 oz of this product with 10 gallons of water If

no test kit is available prepare sanitizing solution by thoroughly mixing 2 oz of product with 10 gallons of water to provide approximately 200 ppm available chlorine by weight

Clean equipment in the normal manner Prior to use immerse equipment in the sanitizing solution for at least 2 minutes and allow the sanitizer to drain If solution contains less than 50 ppm available chlorine as determined by a suitable test kit either discard the solution or add sufficient product to reestablish a 200 ppm residual Do not rinse equipment with water after treatment

Sanitizers used in automated systems may be used for general cleaning but may not be reused for sanitizing purposes

FLOW/PRESSURE METHOD Disassemble equipment and thoroughly clean after use Assemble equipment in operating position prior to use Prepare a volume of a 200 ppm available chlorine sanitizing solution equal to 110 % of volume capacity of the equipment by mixing the product in a ratio of 2 oz product with 10 gallons of water Pump solution through the system until full flow is obtained at all extremities the system is completely filled with the sanitizer and all air is removed from the system Close drain valves and hold under pressure for at least 2 minutes to insure contact with all internal surfaces Remove some cleaning solution from drain valve and test with a chlorine test kit Repeat entire cleaning/sanitizing process if effluent contains less than 50 ppm available chlorine

CLEAN IN PLACE METHOD Thoroughly clean equipment after use Prepare a volume of a 200 ppm available chlorine sanitizing solution equal to 110 % of volume capacity of the equipment by mixing the product in a ratio of 2 oz product with 10 gallons of water Pump solution through the system until full flow is obtained at all extremities the system is completely filled with the sanitizer and all air is removed from the system Close drain valves and hold under pressure for at least 10 minutes to insure contact with all internal surfaces Remove some cleaning solution from drain valve and test with a chlorine test kit Repeat entire cleaning/ sanitizing process if effluent contains less than 50 ppm available chlorine

SPRAY/FOG METHOD Pre clean all surfaces after use Use a 200 ppm available chlorine solution to control bacteria, mold or fungi and a 600 ppm solution to control bacteriophage Prepare a 200 ppm sanitizing solution of sufficient size by thoroughly mixing the product in a ratio of 2 oz product with 10 gallons of water Prepare a 600 ppm solution by thoroughly mixing the product in a ratio of 6 oz product with 10 gallons of water Use spray or fogging equipment which can resist hypochlorite solutions Always empty and rinse spray/fog equipment with potable water after use Thoroughly spray or fog all surfaces until wet allowing excess sanitizer to drain Vacate area for at least 2 hours Prior to using equipment rinse all surfaces treated with a 600 ppm solution with a 200 ppm solution

SANITIZATION OF POROUS FOOD CONTACT SURFACES

RINSE METHOD Prepare a 600 ppm solution by thoroughly mixing 6 oz of this product with 10 gallons of water Clean surfaces in the normal manner Rinse all surfaces thoroughly with the 600 ppm solution maintaining contact for at least 2 minutes Prepare a 200 ppm sanitizing solution by thoroughly mixing 2 oz of this product with 10 gallons of water Prior to using equipment rinse all surfaces with a 200 ppm available chlorine solution Do not rinse and do not soak equipment overnight

IMMERSION METHOD Prepare a 600 ppm solution by thoroughly mixing in an immersion tank 6 oz of this product with 10 gallons of water Clean equipment in the normal manner Immerse equipment in the 600 ppm solution for at least 2 minutes Prepare a 200 ppm sanitizing solution by thoroughly mixing 2 oz of this product with 10 gallons of water Prior to using equipment immerse all surfaces in a 200 ppm available chlorine solution Do not rinse and do not soak equipment overnight

SPRAY/FOG METHOD Pre clean all surfaces after use Prepare a 600 ppm available chlorine sanitizing solution of sufficient size by thoroughly mixing the product in a ratio of 6 oz product with 10 gallons of water Use spray or fogging equipment which can resist hypochlorite solutions Always empty and rinse spray/fog equipment with potable water after use Thoroughly spray or fog all surfaces until wet allowing excess sanitizer to drain Vacate area for at least 2 hours Prior to using equipment rinse all surfaces with a 200 ppm available chlorine solution Prepare a 200 ppm sanitizing solution by thoroughly mixing 2 oz of this product with 10 gallons of water

DISINFECTION OF NONPOROUS NON FOOD CONTACT SURFACES

RINSE METHOD Prepare a disinfecting solution by thoroughly mixing 6 oz of this product with 10 gallons of water to provide approximately 600 ppm available chlorine by weight Clean equipment surfaces in the normal manner Prior to use rinse all surfaces thoroughly with the disinfecting solution maintaining contact with the solution for at least 10 minutes Do not rinse equipment with water after treatment and do not soak equipment overnight

IMMERSION METHOD Prepare a disinfecting solution by thoroughly mixing in an immersion tank 6 oz of this product with 10 gallons of water to provide approximately 600 ppm available chlorine by weight Clean equipment in the normal manner Prior to use immerse equipment in the disinfecting solution for at least 10 minutes and allow the sanitizer to drain Do not rinse equipment with water after treatment

COMMERCIAL LAUNDRY SANITIZERS

Spin wet fabrics or clothes dry prior to sanitization Thoroughly mix 2 oz of this product with 10 gallons of water to yield 200 ppm available chlorine Promptly after mixing the sanitizer add the solution into the pre wash prior to washing fabrics/clothes in the regular wash cycle with a good detergent Test the level of available chlorine if solution has been allowed to stand Add more of this product if the available chlorine level has dropped below 200 ppm

FOOD EGG SANITIZATION

Thoroughly clean all eggs Thoroughly mix 2 oz of this product with 10 gallons of warm water to produce a 200 ppm available chlorine solution
The sanitizer temperature must not exceed 130 F Spray the warm sanitizer so that the eggs are thoroughly wetted Allow the eggs to thoroughly dry
before casing or breaking Do not apply a potable water rinse Do not reuse the solution to sanitize eggs