



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

January 8, 2013

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Abigail T. Downs, Regulatory Consultant to Packers Chemical, Inc.  
TSG: Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, DC 20036

Subject: Label Amendment Results  
Product Name: **KC-615**  
EPA Registration Number: **63679-1**  
Application Date: December 18, 2012  
Application Receipt: December 19, 2012

Dear Ms. Downs:

This acknowledges receipt of your Label Amendment application, submitted pursuant to registration under the Federal Insecticide, Fungicide, and Rodenticide Act ( FIFRA ) 3 ( c ) 9, as amended.

Proposed Amendment:

Packers Chemical, Inc. is submitting a Label Amendment for use as a "Booster for Alkaline Detergents to Clean Food Processing Equipment" for **EPA Reg. No. 63679-1**.

On Page Two above "Directions For Use" statement:

**Proposing the following:** "Booster For Alkaline Detergents To Clean Food Processing Equipment: KC-615 is an effective bleach cleaning booster for use with alkaline detergents. For cleaning application as a detergent booster, use 1-20 oz. in 10 gallons of water (100-2000 ppm available chlorine by weight) to aid in the removal of organic soils. All non-porous food contact surfaces treated with booster detergent must be rinsed thoroughly with a potable water rinse followed by sanitizing with an approved food contact surface sanitizer."

**Deleting the following:** "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 defined by use facility."

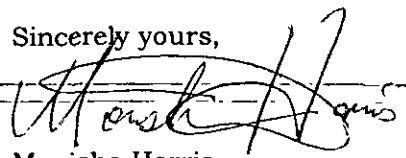
General Comments:

Based on the review of the material submitted, the following comment applies. The Label Amendment application is **Acceptable**. A stamped, **Accepted**, KC-615 Product Label is enclosed for your records and the same has been added to your File ( **EPA Reg. No. 63679-1** ) for future reference.

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If you have questions or comments with regard to this Agency Letter, the please contact Killian Swift via email at [Swift.Killian@epa.gov](mailto:Swift.Killian@epa.gov) or by telephone at **703-308-6346**. When you are submitting information or data in response to this Agency Letter, please send a copy of this Agency Letter with your response in order to facilitate processing.

Sincerely yours,



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

Enclosure: EPA stamped, **Accepted**, KC-615 Product Label.

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> <b>Amendment</b> <input type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide – Section I**

1. Company/Product Number <b>63679-1</b>	2. EPA Product Manager <b>Monisha Harris</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Packers Chemical, Inc. / KC-615</b>	PM# <b>32</b>	
5. Name And Address Of Applicant (Include ZIP Code) <b>Packers Chemical, Inc.</b> <b>3729 Peddle Hollow Rd.</b> <b>Kieler, WI 53812</b> <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section II**

<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain Below.
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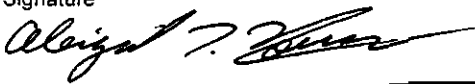
Explanation: Use additional page(s) if necessary. (For section I and Section II.)

**Submission of label amendment to add directions for use as a booster for alkaline detergents to clean food processing equipment. Please confirm receipt with Abigail Downs: adowns@tsgusa.com, via phone (202) 828-8992, or via fax (202) 872-0745.**

**Section III**

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes"                      No. per Unit Packaging wgt.      Container	If "Yes"                      No. per Unit Packaging wgt.      Container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	
5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Pager glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name <b>Abigail Downs, Technology Sciences Group, Inc.</b>	Title <b>Regulatory Consultant</b>	Telephone No. (Include Area Code) <b>(202) 828-8932</b>
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.		6. Date Application Received (Stampcd)
2. Signature 	3. Title <b>Regulatory Consultant to Packers Chemical, Inc.</b>	
4. Typed Name <b>Abigail T. Downs</b>	5. Date <b>December 18, 2012</b>	

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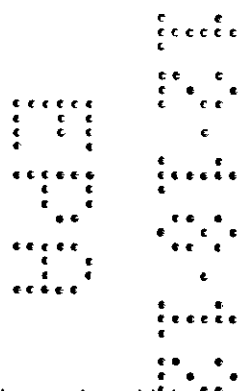
Technology Sciences Group Inc.  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, D.C. 20036  
Direct: (202) 828-8945  
Fax: (202) 872-0745  
E-Mail: hbjornson@tsgusa.com

Abigail Downs  
Regulatory Consultant

Monisha Harris, PM 32  
Office of Pesticide Products, US EPA  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

December 18, 2012

**RE: Minor Label Amendment**  
**Company Name:** Packers Chemical, Inc.  
**Product Name:** KC-615  
**EPA Reg. No.:** 63679-1



Dear Ms. Harris:

Technology Sciences Group Inc., on behalf of Packers Chemical, Inc., is submitting the enclosed label amendment to add directions for use to the aforementioned product label for use as a "Booster for Alkaline Detergents to Clean Food Processing Equipment." Please see the following enclosed in support of this application:

- 8570-1, Application for Pesticide;
- One redline copy of the product label with the changes indicated;
- Five copies of the product label.

Should you have any questions or comments, please do not hesitate to contact me directly via phone at 202-828-8992, or email at [adowns@tsgusa.com](mailto:adowns@tsgusa.com).

Sincerely,

Abigail Downs  
Regulatory Consultant to  
Packers Chemical, Inc.

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# KC-615

**ACTIVE INGREDIENT:**

SODIUM HYPOCHLORITE.....12.5%  
 OTHER INGREDIENTS.....87.5%  
 TOTAL.....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 1-800-424-9309**

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**

**ACCEPTED**  
 JAN 8 2013  
 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 63679-1

**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 vapor: *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 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 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.

**BOOSTER FOR ALKALINE DETERGENTS TO CLEAN FOOD PROCESSING EQUIPMENT:** KC-615 is an effective bleach cleaning booster for use with alkaline detergents. For cleaning application as a detergent booster, use 1-20 oz. in 10 gallons water (100-2000 ppm available chlorine by weight) to aid in the removal of organic soils. All hard non-porous food contact surfaces treated with this boosted detergent must be rinsed thoroughly with a potable water rinse followed by sanitizing with an approved food contact surface sanitizer.

**DIRECTIONS FOR USE:**

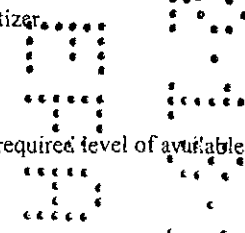
It is a violation of federal law to use this product in a manner inconsistent with its labeling.

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 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 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**

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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.

