

63679-1

7/3/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 3, 2013

Ms. Megan E. Pletka, Regulatory Consultant to Packers Chemical, Inc.
"TSG": Technology Sciences Group
1150 18th Street, NW, Suite 1000
Washington, DC 22202-4501

SUBJECT: FQPA Code 332 Minor Label Changes per PR Notice 98-10
PRODUCT NAME: **KC-615**
EPA REGISTRATION NUMBER: **63679-1**
APPLICATION DATE: June 24, 2013
APPLICATION RECEIVED DATE: June 24, 2013

Dear Ms. Pletka:

This acknowledges receipt of your Notification application, submitted under the provisions of FIFRA section 3(c) 7(A) and PR Notice 98-10.

Pesticide Application:

Packers Chemical, Inc. is submitting the following two Minor Label Changes for **EPA Reg. No. 63679-1**:

1. The appearance of the NSF Logo on the Product Label;
2. The appearance of the Marketing Claim: "Directions For Use continued on (Right)(Left) panel" on the Product Label.

General Comments:

Based on the review of the submitted material, the following comments apply. The Notification application is **Acceptable**. A copy of the **accepted** Notification is attached in **Regulatory File Jacket 63679-1**.

If you have questions or comments with regard to this Agency Letter, the please contact Killian Swift via email at 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,

A handwritten signature in black ink, appearing to read "D. Fuller".

Demson Fuller,
Acting EPA Product Manager 32
Regulatory Management Branch II
Antimicrobials Division 7510P

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

1. Company/Product Number 63679-1	2. EPA Product Manager Mike Mendelsohn	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Packers Chemical, Inc. / KC-615	PM# 32	
5. Name And Address Of Applicant (Include ZIP Code) Packers Chemical, Inc. 3729 Peddle Hollow Rd. Kieler, WI 53812 <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 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"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain Below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

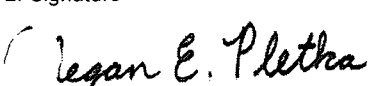
Submission of label notification to add NSF logo and optional marketing claim per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of 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 this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 12 of FIFRA.

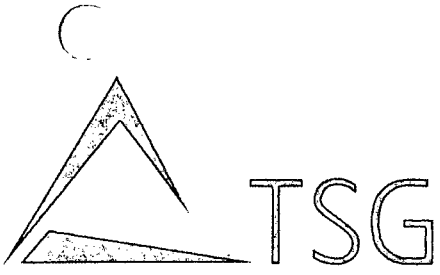
Please send all correspondence to: Megan E. Pletka, Technology Sciences Group, Inc., 1150 18th Street, NW, Suite 1000, Washington, DC 20036

Section III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per Container	If "Yes" Unit Packaging wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
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"/> Other _____		
<input type="checkbox"/> Lithographed					
<input type="checkbox"/> Paper glued					
<input type="checkbox"/> Stenciled					

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application:)		
Name Megan E. Pletka, Technology Sciences Group, Inc.	Title Regulatory Consultant	Telephone No. (include Area Code) (202) 828-8954
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 (Stamped)
2. Signature 	3. Title Regulatory Consultant to Packers Chemical, Inc.	
4. Typed Name Megan E. Pletka	5. Date June 24, 2013	



Technology Sciences Group Inc.
1150 18th Street, NW, Suite 1000
Washington, D.C. 20036
Direct: (202) 828-8954
Fax: (202) 872-0745
E-Mail: mpletka@tsgusa.com

Megan E. Pletka
Regulatory Consultant

Mike Mendelsohn, PM 32
Office of Pesticide Products, US EPA
Document Processing Desk (NOTIF)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

June 24, 2013

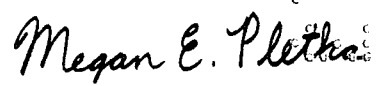
RE: Label Notification to Add NSF Logo and Minor Marketing Claim
Company Name: Packers Chemical, Inc.
Product Name: KC-615
EPA Reg. No.: 63679-1

Dear Mr. Mendelsohn:

Technology Sciences Group Inc., on behalf of Packers Chemical, Inc., is submitting the enclosed label notification to add the National Science Foundation (NSF) logo as well as an optional marketing claim to the aforementioned product label. Please see the following enclosed documentation to support this application:

- EPA Form 8570-1, Application for Pesticide Registration;
- One highlighted copy of the product label;
- Three clean copies of the product label.

Should you have any questions or comments, please do not hesitate to contact me directly via phone at 202-828-8954, or email at mpletka@tsgusa.com.

Sincerely,

Megan E. Pletka
Regulatory Consultant to
Packers Chemical, Inc.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER. Corrosive. Causes irreversible eye damage. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt, pants, safety goggles and rubber gloves when handling this product. Wash thoroughly with soap and water after handling, 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 reset 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 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 purposes. 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, 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.

DISINFECTION OF NONPOROUS NON-FOOD CONTACT SURFACE.

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, immerse equipment in the disinfecting solution for at least 10 minutes. Do not rinse equipment with water after treatment.

IMMERSSION METHOD - Prepare a disinfecting solution by thoroughly mixing 600 ppm available chlorine 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.

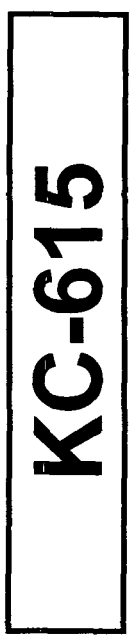
IMMERSSION METHOD - Prepare a disinfecting solution by thoroughly mixing 600 ppm available chlorine tank, 6 oz. of this product with 10 gallons of water to provide approximately 600 ppm available chlorine by weight. Clean equipment in the normal manner. Prior to use, immerse equipment in the disinfecting 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 should 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.

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 should 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.



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.
IF ON SKIN OR CLOTHING:
 -Remove contaminated clothing.
 -Rinse skin immediately with plenty of water for 15-20 minutes.
IF SWALLOWED:
 -Call a poison control center or doctor immediately for treatment advice. 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 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-W1-001

Manufactured for:

Packers Chemical, Inc.

3729 Peddle Hollow Rd.

Kieler, WI 53812

CONTENTS: 5 GALLONS (18.92L) 55 GALLONS (208.17L)

BATCH: _____

UN1791, Hypochlorite Solution, 8 Corrosive Material, PGIII

LISTED (XXXXXX)

NSF

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000