



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 26 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Kim Davis, Agent for Activon, Inc.
30856 Rocky Road
Greely, CO. 80631-9375

SUBJECT: May 7, 2003 Amendment
EfferSan
EPA Registration 66570-2

Dear Ms. Davis:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is conditionally acceptable provided the following changes are made:

- 1). Add the word "separately" to last sentence of Precautionary Statements so sentence reads: "Remove contaminated clothing and wash clothing separately before reuse."
- 2). Increase the type size of phrase FIRST AID and make it all upper case letters.
- 3). Spell out B.O.D. on page 3.

In summary, your request to update this label in accordance with PR Notices 95-1, 97-6, 2000-5 and 2001-1 is acceptable. Your request to change the product name of record and update the Poultry House directions is acceptable. Your re-phrasing of the directions through-out the label is also acceptable.

A copy of your conditionally approved label is enclosed. Please submit a copy of your finished label including these revisions. If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,

A handwritten signature in black ink, appearing to read "R. Brennis".

Robert S. Brennis
Product Manager (32)
Regulatory Management Branch II
Antimicrobial Division (7510-C)

Enclosure

EfferSan™

**Protects Against Odor
Controls Bacteria and Algae
Multi-purpose effervescent tablets
Sanitizes, disinfects and protects against odor**

Active Ingredient:
Sodium Dichloro-s-Triazinetrione 50%
Other Ingredients 50%
Available Chlorine: 30% **Total** 100%

With Activon Technology

**Keep Out of Reach of Children
DANGER**
See back panel [inside] [booklet] for additional precautionary statements.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

100 Tablets (1.42 lb.)
24 Tablets (0.34 lb.)

JUN 26 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

EPA Reg. No. 66570-2 EPA Est. _____

66570-2

[Manufactured for]
Activon, Inc.
900 Green Valley Road
Beaver Dam, WI 53916

{Back Panel/Booklet}

PRECAUTIONARY STATEMENTS Hazards to Humans & Domestic Animals

DANGER: Corrosive: causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes, on skin or on clothing. Avoid breathing dust. Wear goggles or face shield. Thoroughly wash with soap and water after handling. Remove contaminated clothing and wash before reuse.

separately First Aid *make bigger & all caps*

Have the product container or label with you when calling a poison control center or doctor or going for treatment. [You may also call 1-800-222-1222 {or other appropriate number} for emergency medical treatment advice.]

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 the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If Swallowed	<ul style="list-style-type: none"> Immediately call a poison control center or doctor for treatment advice. Have person drink large amounts of water if able to swallow. Avoid alcohol. 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	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Immediately rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

{Note: The first aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

Physical or Chemical Hazards

Use only clean, dry utensils. Mix only into water. Contamination with moisture, dirt, organic matter or other chemicals (including pool chemicals) or any other foreign matter may start a chemical reaction with generation of heat, liberation of hazardous gasses and possible generation of fire and explosion. Avoid any contact with flaming or burning materials such as a lighted cigarette. Do not use this product in any chlorinating device that has been used with any inorganic or unstabilized chlorinating compounds (e.g., calcium hypochlorite). Such use may cause fire or explosion.

Environmental Hazards

This pesticide is toxic to fish and aquatic organisms.

DIRECTIONS FOR USE

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

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 66570-2

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SPA AND TUB USE

Eight (8) tablets of this product will provide approximately 3 ppm available chlorine in 500 gallons of water. Using an appropriate test kit, test and adjust the water to the following values: pH: 7.2 - 7.8; total alkalinity: 60 - 100 ppm; calcium hardness: 200 ppm, minimum. Maintain these conditions for proper spa and hot tub operation by frequent testing with a test kit. Do not allow cyanuric acid level to exceed 150 ppm. It is recommended that spas and hot tubs be drained every 30 - 90 days, more often under heavy use. Consult manufacturer's recommendations concerning the compatibility of chlorine sanitizers with their equipment. Some oils, lotions, fragrances, cleansers, etc., may cause foaming or cloudy water and may react with chlorine sanitizers, reducing their efficacy. Reentry into treated spas/hot tubs is prohibited above levels of 3 ppm chlorine.

Start-Up (Freshly Filled)

1. Turn on the circulation system and ensure that it is operating properly.
2. Add 8 tablets of this product for each 500 gallons of water. Check the free available chlorine (FAC) level and, if below 4 - 5 ppm, repeat as needed.

Regular Use

Turn on the circulation system and ensure that it is operating properly. Add 8 tablets per 500 gallons of this product to the water. Test for FAC and add additional product, if necessary, to attain 4 - 5 ppm FAC. Maintain 1 - 3 ppm FAC while the spa or hot tub is in use. After each use, shock treat with 24 tablets per 500 gallons water to control odors and algae. Repeat as needed. Spa or hot tub should not be entered until FAC reaches 1 - 3 ppm.

Extended Non-Use Period

During extended periods when the spa or hot tub is not being used, with the circulation system running, add 24 tablets of this product per 500 gallons twice a week or as needed to maintain 1 - 3 ppm FAC.

FOR USE IN INDUSTRIAL RECIRCULATING WATER COOLING TOWERS, AIR WASHERS & EVAPORATIVE CONDENSERS

Treatment with this product is an effective way to control the growth of bacteria and algae in industrial recirculating water cooling towers, air washers and evaporative condensers.

1. Clean badly fouled systems prior to initiating treatment.
2. Initial Dosage - when the system is just noticeably fouled, add 128 tablets (16 oz.) of this product per 10,000 gallons of water contained in the system. Repeat this dosage, if necessary, until a free available chlorine (FAC) level of 0.5 - 1.0 ppm is obtained, as determined by use of a reliable test kit.
3. Maintenance Dosage - to obtain a FAC of 0.5 - 1.0 ppm, add 20 - 40 tablets (2.5 - 5.0 oz.) of this product per 10,000 gallons of water daily or as needed.
4. Add this product to the system at a point where adequate flow is maintained. Variations in water temperature, chlorine demand and flow rate will affect the dissolution rate. Warmer seasons may require an upward adjustment of the FAC.

AIR WASHERS

For use only in industrial air washer systems that maintain effective mist eliminating components. Hypochlorite controls slime-forming bacteria and fungi in air washer systems. This product may be added to the system either continuously, intermittently or as needed. The frequency of feeding and duration of the treatment will depend on the severity of the problem.

1. Clean badly fouled systems prior to initiating treatment.
2. Initial Dosage - when the system is just noticeably fouled, add 128 tablets (16 ounces) of this product per 10,000 gallons of water contained in the system. Repeat this dosage, if necessary, until a free available chlorine (FAC) level of 0.5 - 1.0 ppm is obtained, as determined by use of a reliable test kit.
3. Maintenance Dosage - to maintain a FAC of 0.5 - 1.0 ppm, add 20 - 40 tablets (2.5 - 5.0 oz.) of this product per 10,000 gallons of water, daily or as needed.
4. Add this product to the system at a point where adequate flow is maintained. Variations in water temperature, chlorine demand and flow rate will affect the dissolution rate. Warmer seasons may require an upward adjustment of the FAC.

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FOR USE IN SEWAGE TREATMENT

Insecticide,
Fungicide, Herbicide, Algaecide, Actas

66570-2

- 1. Disinfection of Effluents:** Disinfection by chlorination or hypochlorination does not occur instantaneously. A suitable detention basin must be provided to expose the sewage effluent to the effects of this product for a sufficient period of time (usually a minimum of 15 minutes). Where mechanical stirring or other agitation is not present, introduce chlorination for disinfection before primary or secondary sedimentation treatments, if these are used.

The amount of product solution required will vary, depending on the concentration and conditions of the final effluent. Treat the sewage before it has reached a septic state. Experiments indicate that about 30% of the chlorine demand of raw sewage is attributed to settle solids; 40% to suspended and colloidal solids; and 30% to dissolved solids.

Whenever possible, control disinfection by laboratory checks. Disinfection can be achieved when the chlorine residual (after 15 - 30 minutes contact time) is between 0.6 and 1.0 ppm. Experience with different types of treated sewage may eventually establish a relationship between the residual chlorine content of the final effluent and the contact time necessary to ensure the desired bacteriological results. Once this relationship is established, the residual chlorine content and contact time may then become the controlling factors for operation. Perform occasional bacteriological checks as a safeguard.

Hypochlorinators used to treat sewage in small communities must be located near the influent of the detention basin. To conform with the requirements mentioned above, the feed rate must be adjusted to the higher dosages usually required for sewage practices. In cases where sewage is to be temporarily disinfected before being diluted in a body of water, the following conditions will usually provide satisfactory protection against receiving waters' pollution:

- a. Raw sewage: 10 - 30 ppm available chlorine
- b. Primary treated sewage: 5 - 20 ppm available chlorine
- c. Sewage which has undergone primary and secondary treatment, or secondary alone: 2 - 5 ppm

Frequently perform bacteriological tests as a safeguard. The available chlorine level in the discharge effluent should be between 0.6 and 1.0 ppm or in accordance with an NPDES permit. For guidance contact the regional office of the EPA.

- 2. Slime Control:** When ponding of the filters is excessive, stoppage of the distributing filter can occur. The continual feeding of a hypochlorite solution into the effluent at a point above the filter nozzles will satisfactorily clean the filter. Dosages will depend on the amount of excess slime accumulated on the nozzles and filter stone. Extreme cases may require dosages as high as 10 ppm available chlorine. Once the desired cleaning has been achieved, an intermittent application of hypochlorite solution to the dosing tanks, just ahead of the filter, is usually successful. The amount and frequency of the dosage needed to give satisfactory continuous operation of the trickling filters depends on the severity of the microbiological problem.

In activated sludge plants, "bulking sludge" can be caused by the presence of slime that interrupts proper settling. A solution of hypochlorite introduced at some point on the return sludge line can be an effective control measure. Normal dosage rates are 2 - 8 ppm available chlorine.

spell out

- 3. B.O.D. Reduction:** The condition can usually be avoided by applying a solution of hypochlorite to the effluent until a substantial residual is obtained. Apply at a point that will permit 10 - 20 minute contact time prior to discharging effluent into the stream. A dosage that leaves a residual available chlorine of about 0.2 ppm after a contact time of at least 10 minutes will afford a reduction of about 1/3 of the effluents B.O.D. Where more permanent or greater B.O.D. reduction is necessary dosing to high available chlorine residuals is recommended.

- 4. Coagulation and Sedimentation:** A great deal of the finer divided suspended matter and most of the colloidal matter in sewage does not readily respond to plain sedimentation. The job of removing substantial portions of this kind of matter is usually accomplished either by chemical precipitation, by filtration or by the use of both processes. Research has proven that prehypochlorination will improve sedimentation and coagulation in sewage treatment operations.

- 5. Treating Effluent from Mobile Sewage Treatment Units:** Only human waste, toilet paper and water should enter the mobile sewage treatment unit. Solids are retained in the unit for later removal, while the liquid portion is filtered, disinfected and discharged. Product is placed in a flow-through container where the liquid effluent passes over them before being discharged.

Disinfection by chlorination or hypochlorination does not occur instantaneously. A suitable detention basin must be provided to expose the sewage effluent to the effects of this product for a sufficient period of time (usually a minimum

APPROVED
PERMITS
Permit Dated:
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of 15 minutes). Frequently test effluent as a safeguard. The available chlorine level in the discharge effluent should be between 0.6 and 1.0 ppm or in accordance with an NPDES permit. For guidance contact the regional office of the EPA.

**FOR USE THROUGHOUT FOOD AND BEVERAGE
PROCESSING AND FOOD HANDLING OPERATIONS**

66570-2

This product is recommended for sanitizing all types of hard, non-porous equipment and utensils used in food processing and canning plants, bottling plants, breweries, fish processing plants, meat and poultry processing plants, milk handling and processing plants, restaurant and institutional dining establishments and poultry houses. Use 12 tablets of this product to 40 gallons of water (100 ppm available chlorine) to sanitize previously cleaned processing and packaging equipment. Allow at least a one minute contact time before draining. Allow adequate draining before contact with beverages.

To control the growth of bacteria in brewery pasteurizers, clean badly fouled systems before treatment. When the system is just noticeably fouled, add 50 - 70 tablets (8 - 10 oz.) of this product per 10,000 gallons of water (17 - 24 tablets in 343 gallons of water) contained in the system. Repeat this dosage if necessary until a free available chlorine (FAC) level of 0.5 - 1.0 ppm is obtained, as determined by use of a reliable test kit. To maintain a FAC of 0.5 - 1.0 ppm, add 7 - 14 tablets (1 - 2 ounces) of this product per 10,000 gallons of water, daily or as needed. Add this product to the system at a point where adequate flow is maintained.

EGG PROCESSING PLANTS

To clean egg shells, spray with a solution containing 12 tablets (2 ounces) of this product per 40 gallons of water (100 ppm available chlorine) at 90°F to 120°F. Spray-rinse the cleaned eggs with warm potable water. Only clean, whole eggs may be sanitized. Dirty, cracked or punctured eggs may not be sanitized.

To destain egg shells, immerse the eggs in a solution containing 100 ppm available chlorine at 90°F to 120°F. After destaining, the eggs must be cleaned by spraying with an acceptable cleaner. Follow with potable water rinse.

To sanitize clean shell eggs intended for food or food products, spray with a solution of 12 tablets (2 oz.) per 40 gallons of water (providing 100 ppm available chlorine). The solution must be equal to or warmer than the eggs, but must not exceed 130°F. Thoroughly wet eggs and allow to drain. Eggs that have been sanitized with this chlorine compound may be broken for use in the manufacture of egg products without prior potable water rinse. Eggs must be reasonably dry before casing or breaking. The solution must not be reused for sanitizing eggs.

Thoroughly clean and sanitize all egg cups, breaking knives, trays and other equipment that come into contact with "off" eggs. First, clean all equipment. Before placing back in use, spray with a solution containing 12 tablets (2 oz.) per 40 gallons of water (100 ppm available chlorine). Allow surfaces to completely drain before contact with egg products. To sanitize egg freezers and dryers (tanks, pipelines and pumps), use the spray (or fog) method of treatment (see **Application Methods**). This procedure is generally used to sanitize large, non-porous surfaces that have already been cleaned of physical soil.

Prepare a solution containing 100 ppm available chlorine. Heavily apply spray to all surfaces the eggs will touch. Thoroughly spray all treated surfaces, corners and turns. Allow at least a one minute contact time before draining. Allow equipment to drain adequately before contact with eggs.

**DIRECTIONS FOR SANITIZING HARD, NON-POROUS SURFACES,
DISHES, GLASSES, FOOD PROCESSING EQUIPMENT AND UTENSILS,
DAIRY AND BREWERY EQUIPMENT AND UTENSILS**

This product is an effective sanitizing agent. Treatment with this product throughout food and beverage processing and food handling operations can help ensure the quality and safety of the final product.

Hand Washing of Items

1. Remove all gross food particles and soil by a preflush or prescrape and, when necessary, presoak treatment. Wash surfaces or objects with a good detergent or compatible cleaner, followed by a potable water rinse before application of the sanitizing solution.
2. Prepare a sanitizing solution by dissolving 3 tablets of this product in 10 gallons of water. This will give a solution containing 100 ppm free available chlorine (FAC).
3. Place equipment, utensils, dishes, glasses, etc. in the solution or spread the solution over the surface to be sanitized.
4. Allow to stand at least one minute, drain the excess solution from the surface and allow to air dry.
5. Fresh sanitizing solution must be prepared at least daily or more often if the solution becomes diluted or soiled.

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Machine Washing of Items

1. Remove all gross food particles and soil by a preflush or prescrape and, when necessary, presoak treatment. Wash surfaces or objects with a good detergent or compatible cleaner, followed by a potable water rinse before application of the sanitizing solution.
2. Dissolve 3 tablets of this product in 10 gallons of water to obtain a solution having a FAC of 100 ppm.
3. Add the solution to the feed tank of immersion or spray type machines that can provide at least one minute contact time for sanitizing dishes, glasses, food processing equipment or utensils. Allow to drain and air dry before use.
4. Promptly use the sanitizing solution. Prepared solutions cannot be reused for sanitizing but may be used for other purposes, such as cleaning.

POULTRY HOUSES

The problem of odor control in poultry houses is not completely solved by normal cleaning practices. The regular use of an efficient bactericide and deodorant is strongly recommended and often required by health authorities. Remove all poultry and feeds from premises, vehicles, coops, crates and enclosures. Remove all litter and droppings from floors, walls and surfaces of barns, pens, stalls, chutes and other facilities occupied or transversed by poultry. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. To disinfect, saturate all surfaces with a solution of at least 1,000 ppm available chlorine for a period of two minutes. A 1,000 ppm solution can be made by thoroughly mixing 30 tablets with 10 gallons of water (15 tablets with 5 gallons of water). Immerse all types of equipment used in handling and restraining poultry, as well as the cleaned forks, shovels and scrapers used for removing litter and manure. Ventilate buildings, coops and other closed spaces. Do not house poultry or employ equipment until chlorine has been absorbed, set or dried. All treated feed racks, mangers, troughs, automatic feeders, fountains and waterers must be thoroughly scrubbed with soap or detergent then rinsed with potable water before reuse.

MILK HANDLING AND PROCESSING EQUIPMENT

This product can be used on dairy farms and in plants processing milk, cream, ice cream and cheese. Rinse milking machines, utensils and all equipment with cold water to remove excess milk. Clean and rinse prior to sanitizing. To sanitize, spray or rinse all precleaned surfaces with a solution of 3 tablets of this product to 10 gallons of water, to obtain a 100 ppm available chlorine solution. Allow adequate draining before contact with dairy products.

APPLICATION METHODS

Freshly prepare all sanitizing solutions. Test solutions during use to ensure the concentration does not drop below the recommended level. Keep in properly labeled containers to protect against contamination. Discard unused solutions.

Pressure Method of Sanitizing Equipment

This method is commonly used to sanitize closed systems, such as fluid milk cooling and handling equipment. It is also appropriate for sanitizing weigh tanks, coolers, short-time pasteurizers, pumps, homogenizers, fillers, sanitary piping and fittings, and bottle and can fillers. For mechanical operations, prepared solutions cannot be reused for sanitizing but may be used for other purposes, such as cleaning. For manual operations, fresh sanitizing solutions must be prepared at least daily or more often if the solution becomes diluted or soiled. First, disassemble and thoroughly clean all equipment immediately after use. Remove all gross food particles and soil by a preflush or prescrape and, when necessary, presoak treatment. Wash surfaces or objects with a good detergent or compatible cleaner, followed by a potable water rinse before application of the sanitizing solution. Then place back in operating position. Prepare a solution containing 12 tablets (2 oz.) to 40 gallons of water (100 ppm available chlorine) in a volume sufficient to fill the equipment. Allow a 10% excess for waste. Pump the solution through the system until it is filled and air excluded. Close final drain valves and hold under pressure for one minute to ensure proper contact with all surfaces. Remove a portion of the cleaning solution from the drainvalve and test with a chlorine test kit. Repeat entire cleaning/sanitizing process if effluent contains less than 50 ppm available chlorine. Rinse system with potable water prior to use.

Spray Method of Sanitizing Equipment

The spray (or fog) method is generally used to sanitize large, non-porous surfaces that have already been freed of physical soil. It is appropriate for batch pasteurizers, holding tanks, weigh tanks, tank trucks and cars, vats, tile walls, ceilings and floors. Clean all surfaces after use. Prepare a solution containing 100 ppm available chlorine. Use pressure-spraying or fogging equipment designed to resist chlorine-containing solutions (e.g., rubber-coated, plastic or stainless steel). When using any other kind of spraying equipment, always empty and thoroughly rinse the spray/fog equipment with potable water immediately after treatment. Apply spray or fog heavily to all surfaces the product will touch. Thoroughly spray (or fog) all treated surfaces, corners and turns until wet. Allow at least a one minute contact time before draining. Allow excess solution to drain and air dry then place in service. Vacate area for at least two hours.

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General Rinse Method

Solutions containing 100 ppm available chlorine sanitize plant floors, walls and ceilings, and also control odors in refrigerated areas and drain platforms. Generously flush or swab surfaces with the solution. After one minute contact time allow solution to drain and then air dry.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Keep product dry in tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame. **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 label instructions, contact your state pesticide or environmental control agency, or the hazardous waste representative at the nearest EPA Regional Office for guidance. **Container Disposal:** Do not reuse empty container. Thoroughly rinse empty container with water to dissolve all material before discarding in trash.

Emergency Handling

In case of contamination or decomposition do not reseal container. If possible, isolate container in open and well-ventilated area. Flood with large volumes of water. Dispose of contaminated material in an approved landfill area.

- [] Denotes alternate/optional language
- { } Denotes language that does not appear on the market labeling

ACCEPTED
 COMMENTS
 Date Letter Dated:
 JUN 26 2003

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No.

66570-2

