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STATES ENVIRONMENTAL PROTECTIC \GENCY UNIT!

February 13, 2013

Ms. Georgia Anastasiou Consultant for Purac America, Inc. Lewis & Harrison 122 C. Street, N.W., Suite 740 Washington, D.C. 20001

Subject: **PURAC®** Sanilac 88 EPA Registration No.: 69132-2 Notification Date: January 18, 2013 EPA Receipt Date: January 22, 2013

Dear Ms. Anastasiou,

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

Proposed Notification

- Adding options for net contents values [562 lbs (255 kg)] or [2646 lbs (1200 kg)]
- Adding the sections to include item number and lot code
- Correcting the company zip code address to read 60069
- Adding non-FIFRA advisory statement "Not Intended For Human Consumption"

General Comments

Based on a review of the submitted materials, to make minor label changes per PR Notice 98-10 is acceptable and apart of the record on file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Lorena Rivas by telephone at (703) 305-5027 or by e-mail at rivas.lorena@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,

queline Campbell-McFarlane Product Manager (34) Regulatory Management Branch II

	CONCURRENCESICTODIALS L	ivision (7510P)
SYMBOL 7510P		
SURNAME ATURS		
DATE 2/13/13		

EPA Form 1320-1A (1/90)

OFFICIAL FILE COPY

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Please read instructions on reverse befor	ore completing form.		Form Approved.	(برت B No. 2070-0	060, Approval expires 05-31-98		
	United States]	Registra		OPP Identifier Numbe		
EPA Env	ironmental Protectio	n Agency					
	Washington, DC 204			ICIIC			
Application for Pesticide - Section I							
1. Company/Product Number 2. EPA Product Manager 3. Proposed Classification							
69132-2		Linda A. Holli			5. Proposed Classification		
4. Company/Product (Name) PURAC Sanilac 88		PM# BPPD			None Restrict		
5. Name and Address of Applicant (Inc	clude ZIP Code)		Review In a	cordance wit	n FIFRA Section 3(c)(3)		
Purac America, Inc.					composition and labeling		
111 Barclay Boulevard		to:			•		
Lincolnshire Corporate Cent Lincolnshire, IL 60069	er	EPA Reg. No.					
PLEASE SEND ALL CORK	RESPONDENCE TO	Product Name	9				
"CONTACT POINT" L			·				
Check if this is a new ad							
-		Section - II					
Amendment – Explain below.		F	inal printed label	s in response to	Agency letter dated		
Resubmission in response to A	gency letter dated	<u> </u>	le Too" Applicati	on			
Notification - Explain below.			ther - Explain be	wole			
Explanation: Use additional Notification to	page(s) if necessary. make minor change			d cover lette	er for details.		
This notification is consistent with the the labeling or the confidential statem statement to EPA. I further understan be in violation of FIFRA and I may be	ent of formula of this produ d that if this notification is a	ct. I understand that not consistent with th	it is a violation of terms of PR N	of 18 U.S.C. Sec. otice 98-10 and 4	1001 to willfully make any fal		
		Section - III					
1. Material This Product Will Be Packa							
Child-Resistant Packaging	Unit Packaging	Water S	Soluble Packagir	ng 2.	Type of Container Metal (plastic-lined drums)		
					Plastic		
	If "Yes" No	p. per If "Yes"		o. per	Glass		
*Certification must	Unit Packaging wgt. co	ontainer Packag	e wgt. co	ontainer	Paper		
be submitted					Other (Specify)		
3. Location of Net Contents Informatio	n 4. Size(s) Ret	ail Container		5. Location of Lat	pel Directions		
Label Con	tainer			On Label			
				On labelin	g accompanying product		
6. Manner in Which Label is Affixed to	Product Lithogr	•	Other				
	Stencil			ر · ر د (
	Stencil	ed Section - IV		ر د ر ر د ر ر د ر ر			
1. Contact Point (Complete items di	Stencil Stencil rectly below for identification	ed Section - IV of individual to be co	ntacted, if neces	sary, to process	ີ ເປັນ ເປັນເປັນ ເກີຣ applicຂັ້ງດະ,) ຼີ ປີ		
1. Contact Point <i>(Complete items di</i> Name Georgia Anastasiou, Lev 122 C Street NW Suite 505, Washi	rectly below for identification wis & Harrison Title ngton DC 20001	ed Section - IV of individual to be co Agent for P	ntacted, if neces urac America, li	sary, to process	<u>ເດັດເຊັນ</u> ເກີຣ applicຂັ <u>ນ</u> ີດເວັດເວັດ ເອັດສາຍເປັນ ເດັດເຊັນ ເປັນ ເດັດ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດເປັນ ເດັດ ເດັດເປັນ ເດັດເປັນ ເດັດ ເດັດ ເດັດ ເດັດ ເດັດ ເດັດ ເດັດ ເດ		
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LEWIS & Harrison

122 C Street, N.W., Suite 505 Washington, D.C. 20001

telephone 202.393.3903 fax 202.393.3906

Consultants in Government Affairs

January 18, 2013

HAND-DELIVERED

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

ATTENTION: Linda Hollis Biopesticides and Pollution Prevention Division

SUBJECT:

Purac America, Inc. Purac Sanilac 88 (EPA Reg. No. 69132-2) Notification in Accordance with PR Notice 98-10

Dear Ms. Hollis:

On behalf of Purac America, Inc. ("Purac"), I am submitting a notification for the product **Purac Sanilac** 88 (EPA Reg. No. 69132-2). The changes to the product label are as follows:

- A. Add the options for net contents values;
- B. Add the sections to include the item number and lot code;
- C. Correct the zip code for the company address to read 60069; and,
- D. Add the non-FIFRA advisory statement -"Not intended for human consumption".

Please note no other changes have been made to the product label.

Enclosed please find the following documents to support this submission:

- 1) Pesticide Application which includes a signed statement certifying compliance with PR Notice 98;
- 2) One (1) copy of the revised product label, with the changes highlighted; and,
- 3) Two (2) copies of the revised product label.

Thank you for your attention to this matter. If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com.

Sincerely,

Surgia anastasion

Georgia Anastasiou Agent for Purac America, Inc.

cc: Michaela Hume (Purac)

PURAC[®] Sanilac 88 FOR MANUFACTURING USE ONLY

Active Ingredient:	
L-Lactic Acid	88.0%
Inert Ingredients	1 <u>2.0%</u>
TOTAL	100.0%

*Contains 8.8 lbs. of active ingredient per gallon (880 g per kg)

KEEP OUT OF REACH OF CHILDREN

PELIGRO DANGER

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment.

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

HOT LINE NUMBER

Have a product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

CORROSIVE: Causes irreversible eye damage and skin burns. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Wear protective eyewear (safety glasses, goggles, or face shield), protective clothing, 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. Remove and wash contaminated clothing before reuse

ENVIRONMENTAL HAZARDS

This pesticide 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Item Number: Lot Code:

WARRANTY LIMITATIONS AND DISCLAIMER

Purac America, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated when used in accordance with the use directions under normal conditions. Purac America, Inc. neither makes, nor authorizes any agent or representative to make, any other warranty of fitness or of merchantability, guarantee or representation, express or implied, concerning this material.

Manufactured for



Lincolnshire, IL 60069

EPA Reg. No. 69132-2

EPA Est. No.

Net Contents: [562 lbs (255 kg)] or [2646 lbs (1200 kg)]

DIRECTIONS FOR USE

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

PURAC[®] Sanilac 88 is only to be used in the manufacture and formulation of antimicrobial products for hospital, institutional, commercial, industrial, and residential use.

Formulators using PURAC[®] Sanilac 88 to manufacture their own products are responsible for registering those products with US EPA.

This product may be used to formulate products for any additional use(s) not listed on the label if the formulator or user group has complied with US EPA submission requirements regarding support of such use(s).

Not Intended For Human Consumption

STORAGE AND DISPOSAL

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

Pesticide Storage: Do not store at jemperatures above 140°F. Do not store mixed material. ĉ

Pesticide Disposal: Pesticide wastes, areceptely hazardous. Improper disposal of excess pesticide 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. Leire

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse as follows: Empty the remaining contents into application equipment or mix tank. Fill the container $\frac{1}{\sqrt{2}}$ full with water. Replace and tighten closures. Tip the container on its side and roll it back and forth several times, ensuring at least one complete revolution, for 30 seconds. Stand container on its end and tip back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat the procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn unless allowed by state and local ordinances