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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 23, 2003

Mr. Edward Doheny
Compliance Chemist
Quadra Chemicals Western, Inc.
5700 NW Front Ave.
Portland, OR 97210

Subject: **Alas 478**
EPA Registration No. 74210-1
Application Dated June 26, 2003

Dear Mr. Doheny:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following comments .

Proposed Amendment

- Revised label (change in rate to "1-2 oz/10 gallons of water, 200-400 ppm active anionic sanitizer")

General Comments


1. With respect to the Confidential Statement of Formula (CSF) dated April 7, 1997, explain why there is a range of "pH 1-1.7" in block no. 8.
2. Change the chemical name "dodecyl benzene sulfonic acid" to "alkyl benzene sulfonic acid" (CSA Reg. No. 68584-22-5).
3. Submit an up-dated CSF for review.

Other Comments

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,



Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

PESTICIDE STORAGE:

Keep container tightly closed when not in use. If contents are spilled or leaked due to container damage, collect liquid with absorbent material and dispose of in accordance with local, state, and federal pesticide disposal regulations.

PESTICIDE DISPOSAL:

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixtures or dilute solutions 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:

Metal containers - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Plastic containers - Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or incinerator, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

EPA REG. NO. 74210-1
EPA EST. NO. 74210-OR-1

ALAS-478

PHOSPHORIC ACID-ANIONIC SANITIZER AND CLEANER
FOR USE ON ALL HARD NONPOROUS SURFACES

ACTIVE INGREDIENTS:	
Phosphoric Acid	30.00%
C(10-15) Alkylbenzene Sulfonic Acid	25.68%
INERT INGREDIENTS	44.48%
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN
DANGER

SEE ADDITIONAL PRECAUTIONS ON SIDE PANEL
FOR INDUSTRIAL USE ONLY

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

ALAS-478 IS ACCEPTED BY THE USDA FOR USE IN FEDERALLY-INSPECTED MEAT, POULTRY, SHELL EGG GRADING AND EGG PRODUCTS

GENERAL PRECAUTIONS AND RESTRICTIONS: Do not apply this product in a way that will contact workers or other persons. Only protected handlers may be in the area during application.

ALAS-478 is an excellent liquid acid anionic cleaner and sanitizer. It is effective against gram positive and gram negative bacteria (Staphylococcus aureus, Pseudomonas aeruginosa and Escherichia coli) at 1 to 2 fluid ounces of ALAS-478 per 10 gallons of water (200 to 400 ppm active anionic sanitizer) on stainless steel, painted steel, plastic, and tile surfaces.

ALAS-478 is effective against *Listeria monocytogenes* at 1 to 2 fl. oz. per 10 gallons of water on stainless steel, plastic, and painted steel surfaces. For tile or similar surfaces, use fl. oz. of ALAS-478 per 5 gallons of water (400 ppm active anionic sanitizer) is required.

ALAS-478 passes the A.O.A.C. Germicidal and Detergent Sanitizing Tests for food contact surface sanitizers at concentration of 1 fl. oz. ALAS-478 per 10 gallons of water.

GENERAL CLEANING INSTRUCTIONS

FOAM CLEANING: Use 1 to 2 quarts of ALAS-478 per each 50 gallon foam charge of warm (100-110 degree F.) water. Allow the foam a contact time of 5 minutes, then rinse thoroughly with potable water.

MANUAL CLEANING: Add 1 to 2 oz. of ALAS-478 per each gallon of warm (100-110 degree F.) water. Scrub or brush on thoroughly to clean all surfaces, then rinse with potable water.

MINERAL FILM REMOVAL: Use 3 to 4 oz. of ALAS-478 per each gallon of warm (100-110 degree F.) water. Apply to surfaces by manual procedures or by mechanical foam application and allow a contact time of 5 minutes. Rinse thoroughly with potable water.

SANITIZING INSTRUCTIONS

DAIRY, ICE CREAM AND CHEESE PLANT SANITIZING: For tank trucks, holding tanks, vats and plant equipment, use a 1-2 oz. of ALAS-478 per each 10 gallons of water (200-400 ppm active anionic sanitizer) applied by spray or brush after a thorough cleaning process and potable water rinse. Allow a sanitizer contact time of at least 2 minutes, then drain thoroughly and air dry.

To eliminate *Listeria monocytogenes*, use 1 oz. of ALAS-478 per each 5 gallons of water (400 ppm active anionic sanitizer) applied by spray or brush after a thorough cleaning process and potable water rinse. Allow a sanitizer contact time of at least 2 minutes, then drain thoroughly and air dry.

BACTERIOPHAGE CONTROL, CHEESE PLANTS: After a thorough cleaning and rinse with potable water, sanitize all cheese equipment with an ALAS-478 solution containing a 1-2 oz. of ALAS-478 per each 10 gallons of water (200-400 ppm active anionic sanitizer). Allow a two-minute sanitizer contact time, then drain the solution from the equipment.

Using the appropriate equipment, wet spray to cover all surfaces with an ALAS-478 solution containing 1 oz. of ALAS-478 per each 5 gallons of water (400 ppm active anionic sanitizer). After all surfaces are covered, close the rooms and allow to stand overnight.

ACIDIFIED RINSE, CIP SANITIZING, DAIRY PLANTS: Following a thorough cleaning procedure and final rinse with potable water, prepare a 1-2 oz. of ALAS-478 per each 10 gallons of water (200-400 ppm active anionic sanitizer) solution and pump it through the lines for at least 2 minutes. Do not circulate. Drain the sanitizer solution from the lines, allowing thorough drainage.

RESTAURANT AND INSTITUTIONAL ESTABLISHMENT SANITIZING

- Scrape/pre-wash plates, utensils, cups, glasses whenever possible.
- Wash all items with good detergent.
- Rinse thoroughly with potable water.
- Sanitize in an ALAS-478 solution containing 1-2 oz. of ALAS-478 per each 10 gallons of water (200-400 ppm active anionic sanitizer). Immerse all items for at least 2 minutes or for a contact time specified by the local governing sanitizing code.
- Place all sanitized items on a rack or drainboard to air dry.

FOR USE IN DAIRY FARM SANITIZING

BULK MILK COOLING TANKS: Prior to filling the tank with milk, sanitize the tank with a 1-2 oz. of ALAS-478 per each 10 gallons of water (200-400 ppm active anionic sanitizer) solution by brush or spray method. Allow a sanitizer contact time of at least 2 minutes, then drain thoroughly and air dry.

DAIRY FARM UTENSILS: Prior to milking, sanitize the utensils with an ALAS-478 solution (1-2 oz. per each 10 gallons water) by a rinse, spray, immersion, or brush method. Allow a 2-minute sanitizer contact time, then drain thoroughly and air dry.

INFLATIONS: Brush inflations after milking with a warm (100-120°F) ALAS-478 solution containing 1-2 oz. of ALAS-478 per each 10 gallons of water (200-400 ppm active anionic sanitizer), using a good inflation brush. Rinse thoroughly with potable water and store as directed by sanitarians or service personnel. Prior to milking, sanitize with an ALAS-478 solution, 1-2 oz. per 10 gallons of water (200-400 ppm active anionic sanitizer). Allow a contact time of 2 minutes, then drain thoroughly and air dry.

BEVERAGE PLANT

CIP LINES, CUP LINES, CUP LINES, CUP LINES: Prepare a 1-2 oz. per 10 gallons ppm active anionic sanitizer solution and pump through the lines for at least 2 minutes. Do it thoroughly from the lines.

PRE-MIX & BLENDING MACHINES: Follow the directions of the manufacturer and use a 1-2 oz. per each 10-gallon (200-400 ppm sanitizer) solution for at least 2 minutes, drain thoroughly and air dry.

GLASSWARE SANITIZING: Rinse glassware thoroughly with potable water and store as directed by sanitarians or service personnel. Prior to milking, sanitize with an ALAS-478 solution, 1-2 oz. per 10 gallons of water (200-400 ppm active anionic sanitizer). Allow a contact time of 2 minutes, then drain thoroughly and air dry.

EMERGENCY NUMBERS:
(503) 699-7055 (QUADRA CHEMICALS)
(800) 424-9300 (CHEMTEC)

FIRST AID

- IF IN EYES:**
- Hold eye open and rinse slowly and gently.
 - Remove contact lenses, if present, after 2 minutes.
 - Call a poison control center or doctor for further treatment.
- IF ON SKIN OR CLOTHING:**
- Take off contaminated clothing.
 - Rinse skin immediately with plenty of water.
 - Call a poison control center or doctor for further treatment.
- IF SWALLOWED:**
- Call a poison control center or doctor immediately for treatment.
 - Have person sip a glass of water if able to do so.
 - Do not induce vomiting unless told to do so.
 - 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.
 - Call a poison control center or doctor for further treatment.

HOTLINE NUMBER:
Have the product or label with you when calling a poison control center or doctor, or going for treatment. Your local number is 1-800-424-9300 for emergency medical information.

NOTE TO PHYSICIAN:
Probable mucosal damage may contraindicate

FOR INFORMATION ON THIS PESTICIDE PRODUCT (INCLUDING HEALTH CONCERNS, MEDICAL EMERGENCIES, OR PESTICIDE INCIDENTS), CALL THE NATIONAL PESTICIDE INFORMATION TELECOMMUNICATIONS NETWORK AT 1-800-737-7378.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

DANGER

CORROSIVE: Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (P.P.E.)

Applicators and other handlers must wear:
- Coveralls over long-sleeved shirt and long pants
- Socks and chemical-resistant footwear
- Goggles or face shield
- Chemical-resistant apron
- Chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, PV, or viton)

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washable, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing or other materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users should remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

PHYSICAL AND CHEMICAL HAZARDS

Do not mix with caustic or alkaline cleaners as violent boiling and spattering may result. Do not add ALAS-478 to hydrochlorite bleaches, chlorine sanitizers or chlorinated cleaners as this liberates toxic, corrosive chlorine gas.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

MANUFACTURED BY:

Quadra Chemicals Western, Inc.

Corporate Office:
5700 NW Front Avenue
Portland, OR 97210
503.242.0200

DOT SHIPPING NAME

**CORROSIVE LIQUIDS, ACIDIC, INORGANIC, N.O.S.
(PHOSPHORIC ACID/DODECYLBENZENE SULFONIC ACID)**

UN3264