

82118-1

10/20/2009

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



Office of Pesticide Programs

OCT 20 2009

Jeff Jones
Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

FILE COPY

Subject: Innophos, Inc.
Sodium Hypochlorite Sanitizer and Cleaner
EPA Registration No. 82118-1
Application Dated: July 8, 2009
Receipt Dated: September 2, 2009

Dear Mr. Jones:

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

Conditions:

1. This product is registered "For Industrial Use As A Sanitizing Agent In Food Service Establishments". Therefore, the statement about repackaging as a sanitizer has been removed. This is an end use product, not a manufacturing use product.

2. Revise the "Hazards to Humans and Domestic Animals" statement as follows:

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 clothing. Wear goggles, or face shield. Wear protective clothing and rubber gloves. 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.

3. You must revise the Container Disposal language per PR Notice 2007-4.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter,
please call Wanda Henson at (703) 308-6345.

Sincerely,

for Wanda Henson

Emily H. Mitchell
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

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ACCEPTED
with COMMENTS
EPA Letter Dated:

Note to Agency: Text appearing in parenthesis or brackets is done to show optional text.

Sodium Hypochlorite Sanitizer and Cleaner

OCT 20 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 82118-1

ACTIVE INGREDIENT:	
Sodium Hypochlorite*	4.0%
OTHER INGREDIENTS:	
	96.0%
TOTAL:	
	100.00%

*Nominal 3.8 % Available Chlorine

FOR INDUSTRIAL USE AS A SANITIZING AGENT IN FOOD SERVICE ESTABLISHMENTS

**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 a person sip a glass of water if able to swallow. 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.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information or Inniophos ECT (Emergency Communication's Team) at 1-615-386-7816.

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

See additional precautionary statements on back (side) (left) (right) (panel) (of) (label) (below).

(See reference sheet (enclosed in case) for additional directions for use.)

Net Contents: 50 lb (22.7 kg) (as marked on container)

4085

Note to Agency: Text appearing in parenthesis or brackets is done to show optional text.

DIRECTIONS FOR USE:

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

TO CLEAN AND DEODORIZE glasses, dishes, mugs, knives, food utensils and equipment, use the following procedures:

Scrape then prewash with **SODIUM HYPOCHLORITE SANITIZER AND CLEANER** solution (1 oz. or 2 Tbs. per quart of water) or other detergent or compatible cleaner. Rinse in potable water.

TO SANITIZE glasses, dishes, mugs, knives, food utensils and equipment, use the following procedures:

Sanitize in **SODIUM HYPOCHLORITE SANITIZER AND CLEANER** solution (0.75 oz. or 1.5 level Tbs. per gallon of potable water (200 ppm)). Immerse all utensils for at least two minutes of contact time specified by governing sanitary code.

Contact your Innophos Sales Representative with any questions about the use of this product at 1-609-495-2495.

NOTE: WHEN USED ON FOOD CONTACT PROCESSING EQUIPMENT AND UTENSILS, AND ON OTHER FOOD CONTACT ARTICLES, FDA REGULATIONS REQUIRE ADEQUATE DRAINING BEFORE CONTACT WITH FOOD.

Solutions should be freshly prepared. Solutions should be tested during use to make sure the concentration does not drop below the recommended level. Keep in properly labeled containers to protect against contamination. Unused solutions should be discarded.

Note: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk and/or handling of this material, when such use and/or handling is contrary to label directions.

Note to Agency: Text appearing in parenthesis or brackets is done to show optional text.

**PRECAUTIONARY STATEMENTS
HAZARD 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 goggles or face shield, protective clothing and rubber gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product 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 agency 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.

PHYSICAL OR CHEMICAL HAZARDS

STRONG OXIDIZING AGENT: Hazardous Carbon Monoxide can form upon contact with food and beverage products in enclosed spaces and can cause death.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store in a cool dry area. Do not contaminate water, food, or feed by storage or disposal.

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: Completely empty by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of in a sanitary landfill or incineration if allowed by state and local authorities.

Offer for recycling if available. This is a non-refillable container. Do not reuse or refill this container.

SPILL OR LEAK

Wear NIOSH/MSHA approved dust/chlorine respirator. Follow OSHA regulations for respirator use (sec. 29 CFR 1910.134). Wear goggles, coveralls and rubber gloves and boots. Shovel or sweep up and place in an approved DOT container and seal.

EPA Reg. No. 82118-1
EPA Est. No. 085466-ISR-001

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Manufactured for:
Innophos Inc.
259 Prospect Plains Road, Cranbury, NJ 08512
1-609-495-2495