



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 23, 2003

Ms. Anna Rodriguez-Koster
Lewis & Harrison Consultants
Agent for National Chemical Laboratories of PA
122 C Street N.W. Suite 740
Washington, DC 20001

Subject: **NAC Pine Odor Disinfectant**
EPA Registration Number 2296-102
Application Dated November 11, 2002

Dear Ms. Rodriguez-Koster:

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

Proposed Amendment

- Response to Agency Letter Dated September 26, 2002

General Comments

1. Remove the statement "FOR USE AND STORAGE BY SERVICE PERSONNEL ONLY" from its present location and place it above or below the product name. The statement should be in large bold letters.
2. The Agency agrees with your rationale for not requiring child-resistant packaging since it does not meet the requirements of 40 CFR §157.22 (b).
3. Based on the revised precautionary statement, this product is not classified as Restricted Use Classification.

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

Should you have any question concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,



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

Enclosure

NAC

Pine-Odor Disinfectant

Active Ingredients:	
Pine Oil	5.00%
ortho-Benzyl-para-chlorophenol	3.60%
Inert Ingredients:	91.40%
Total Ingredients:	100.00%

EPA REG. NO. 2296-102
EPA EST. NO. 2296-PA-1

KEEP OUT OF REACH OF CHILDREN
DANGER

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

FOR SALE TO, USE AND STORAGE BY SERVICE PERSONNEL ONLY

mfg. by National Chemical Laboratories of PA. Inc.
401 North 10th Street
Philadelphia, PA 19123

NET CONTENTS:

ACCEPTED
with COMMENTS
EPA Letter Dated:
JAN 23 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **2296-102**

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 or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wear goggles or face shield (safety glasses). Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and pants,
- socks and shoes,
- goggles or face shield, and
- chemical resistant gloves (such as barrier laminate or butyl nitrile/neoprene rubber, PVC, viton at ≥ 14 mils)

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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. 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 INHALED:	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.
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.

PHYSICAL OR CHEMICAL HAZARDS

This product is corrosive to steel.

(Note to reviewer: If the container size is 5 gallons or larger, the following Environmental Hazards statements will be used:)

ENVIRONMENTAL HAZARDS: 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.

(Note to reviewer: Language in () is optional or interchangeable)

NAC Pine Odor Disinfectant (EPA Reg. No. 2296-102)

11/6/02

DISINFECTANT-DEODORANT-GERMICIDE-CLEANER

An effective pleasant disinfectant deodorant. This product is especially recommended for use in apartment buildings, households, schools, office buildings, and industrial plants for disinfecting floors, walls, sinks, bathrooms, toilets, urinals. Can be used as a deodorant which is noticeable from 1 to 3 hours after use. It is instantly soluble in water forming a milky white emulsion which does not separate on standing. When mixed with water in recommended dilutions does not stain the walls or floors and leaves a pleasant and fragrant odor of pine.

DIRECTIONS FOR USE:

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

Do not apply this product in a way that will contact other persons. Only protected handlers may be in the area during application.

For Disinfecting Premises: This product is recommended for non porous, inanimate surfaces in non-medical areas. Remove gross filth from surfaces. Thoroughly clean surfaces prior to application of product. Prepare a solution of 3 1/2 tablespoons of disinfectant to one gallon of water. Apply disinfecting solution by mop, sponge, and swab. Wet surface thoroughly and allow to remain for minimum 10 minutes. Let surface air dry.

Floors: When mopping or scrubbing use 3 1/2 tablespoons of disinfectant in each gallon of water in bucket.

Toilet Rooms, Commodes, and Urinals: Remove water from toilet bowls. Swab all bowl and urinal surfaces with a solution of 3 1/2 tablespoons of disinfectant per gallon of water making sure to get under the rim. The solution must remain in contact with the treated surface for at least 10 minutes. Scrub the floor and seat frequently with this solution. Use fresh solution each day or when it becomes soiled or diluted.

Garbage Receptacles: To aid in deodorization, sprinkle with a solution in the proportion of 4 tablespoons of disinfectant to a gallon of water. Rinse the empty can with some of the solution and leave the wash in the can. Use this solution to deodorize outhouses.

Farm Premises/Poultry Houses Disinfection: Do not use in milking stalls, milking parlors or milk houses. Remove all animals, poultry, and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes and other facilities occupied or traversed by animals or poultry. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces using 3 1/2 tablespoons of disinfectant in each gallon of water for a period of 10 minutes. Immerse all halters, ropes, and other types of equipment used in handling and restraining animals or poultry, as well as the cleaned forks, shovels, and scrapers used for removing litter and manure, in the recommended use solution. Ventilate buildings, cars, boats, and other closed spaces in which the product has been used. Do not house livestock or poultry or employ equipment until treatment has been absorbed, set or dried. Thoroughly scrub all treated feed racks, mangers, troughs, automatic feeders, fountains, and waterers with soap or detergent, and rinse with potable water before reuse.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a dry place between 50°F and 120°F.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticides, 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:

(Plastic containers): Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

(Note to reviewer: Language in () is optional or interchangeable)