

NOV 7 1988

Arrow Chemical Products, Inc.  
2067 St. Anne Street  
Detroit, MI 48216

Attention: Thaddeus E. Wlodarski

Gentlemen:

Subject: 150 Arrow Sanitizer  
EPA Registration No. 5747-17  
Your Submission Dated December 2, 1987  
EPA Received Date December 9, 1987

The amendment referred to above, submitted in connection with the Label Improvement Program Notice for Antimicrobial Products Used as Food Contact Surface Sanitizers, is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling.
  - a. Change the "First Aid" heading to read "Statement of Practical Treatment."
  - b. Delete the word "milk."
  - c. Change the "Use Directions" heading to "Directions For Use" and add a misuse statement immediately below the "Directions For Use" heading to read as follows:

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

50239:I:Leavy:LL-7:KENCO:10/28/88:12/13/88:rw:ek:vo:rw

CONCURRENCES

SYMBOL

SURNAME

--	--	--	--	--	--	--	--

- d. The contact time is 1 minute for the sanitization section and the directions must also indicate if and how the product should be removed from the surfaces after the recommended exposure period (Rinse or air dry).
- e. Revise the precautionary statements to read as follows:

**PRECAUTIONARY STATEMENTS**  
Hazards to Humans and Domestic Animals  
**DANGER**

Keep Out of Reach of Children. Causes severe eye and skin damage. Do not get in eyes, on skin or on clothing. Harmful if swallowed. Wear goggles or face shield and rubber gloves when handling. Avoid contamination of food. Remove and wash contaminated clothing.

**STATEMENT OF PRACTICAL TREATMENT**

In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes. For eyes, call a physician. Remove and wash all contaminated clothing before reuse. If swallowed, drink egg whites, gelatin solution or if these are not available, drink large quantities of water. Call a physician.

**NOTE TO PHYSICIAN**

Probable mucosal damage may contraindicate the use of gastric lavage.

- f. Include the following "Storage and Disposal" statement to read as follows:

**STORAGE AND DISPOSAL**

**PROHIBITIONS**

Do not contaminate water, food, or feed by storage disposal. Open dumping is prohibited.

**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**

(For 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.

(For 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, by burning. If burned stay out of smoke.

The "STORAGE AND DISPOSAL" heading must be of the same size as the child hazard warning statement.

- g. Within your Directions For Use, specify in each section that sanitized utensils are to be air dried. Delete the statement "No rinse is required" from each of the sections in your Use Directions.
2. We have determined that this product is subject under the child-resistant packaging regulations (effective March 9, 1981).

Two suggestions for compliance are:

- a. Submit a special packaging certification statement. Specifically refer to page 388, "Contents of Certification." Ref: *Federal Register* Vol. 49, No. 2, Wednesday, January 4, 1984, pp. 380-388.

and/or

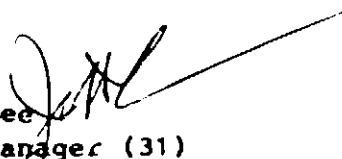
- b. Delete all references to household/home use.
3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Karen Leavy at (703) 557-3966.

Sincerely yours,



John H. Lee  
Product Manager (31)  
Antimicrobial Program Branch  
Registration Division (TS-767C)

Enclosure

<

Reg no: 5747-17

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

NOV -7 1988

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide  
registered under EPA Reg. No.  
5747-17

# 150 ARROW SANITIZER

DISINFECTANT                      SANITIZER  
DEODORIZER

ACTIVE INGREDIENTS:

n-Alkyl (60% C <sub>12</sub> , 30% C <sub>14</sub> , 5% C <sub>16</sub> , 5% C <sub>18</sub> )	
dimethyl benzyl ammonium chlorides	5%
n-Alkyl (68% C <sub>12</sub> , 32% C <sub>14</sub> )	
dimethyl ethylbenzyl ammonium chlorides	5%
INERT INGREDIENTS:	90%
	100%

This is a concentrate and should be diluted before using.

E.P.A. EST. NO. 5747-MI-1  
E.P.A. NO. 5747-17

**DANGER**

Keep Out of Reach of Children. See other precautionary statements on left side panel.

Manufactured by  
Arrow Chemical Products, Inc., Detroit, MI 48216

NET CONTENTS ONE GALLON

Hospitals  
For floors,  
Nursing Home  
Tops, Garbage  
use 3 1/2 ounces  
level it will  
aeruginosa  
Cold Disinfectant  
For disinfecting  
instruments,  
simply submerge  
containing  
water. Submerge  
Food Processing  
For sanitizing  
and food utensils  
water to provide  
At this level  
required.  
Dishes  
To sanitize  
the equipment  
solution concentration  
(200 ppm).  
RINSE is required  
local health

## Restaurant and Bar Rinse

Dishes, glassware, silverware, cooking utensils, wash with soap or synthetic detergent, rinse thoroughly and immerse in a sanitizing solution containing 1 ounce Sanitizer to 4 gallons of water. No Terminal Potable Water Rinse Required.

## Schools, Homes

For sanitizing and disinfecting Schools, Locker Rooms, Garbage Pails, Sink Tops, Corridors, Classrooms, Offices and Shower Stalls. Apply solution with mop or cloth. Sanitize with 1 ounce to 4 gallons of water. Disinfect with 3 ounces to 5 gallons of water. Kills Staphylococcus aureus and Salmonella choleraesuis.

## DANGER

Keep out of reach of children. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Causes severe eye irritation. Causes skin irritation. In case of contact, wash immediately with plenty of water. For eyes get medical attention. Avoid contamination of food.

## FIRST AID

If swallowed, drink milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Call a physician. Rinse empty container thoroughly with water and discard.