

Purdy Products, Inc.
1526 North 31st Street
Milwaukee, WI 53208

OCT 17 1988

Attention: James P. Kucharski

Gentlemen:

Subject: Trophy No-Rac C&S
EPA Registration No. 10710-6
Your Amendment Dated January 25, 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. The phrase "Keep Out of Reach of Children" must be placed immediately above the signal word "DANGER" (front panel only).
 - b. Delete the words "milk" and "Sanitizer."
 - c. Revise the heading "Use Directions" to "Directions for Use," and add the misuse statement to read:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
 - d. Delete the phenol coefficients claim on the left panel.
 - e. Revise the statement "A pre-cleaning step is recommended" to "A pre-cleaning step is required."

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CONCURRENCES

SYMBOL								
SURNAME								
DATE								

- f. The Agency has reviewed our files, and determined that your signal word must be Danger.
- g. The precautionary statements should 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. Wear goggles or face shield and rubber gloves when handling. Harmful if swallowed. Avoid contamination of food.

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 contaminated clothing before reuse.

If swallowed, drink PROMPTLY a large quantity of egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician immediately.

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

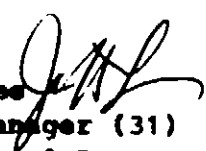
- h. The contact time is 10 minutes for the disinfection section.
 - i. Revise the statements "hazard of cross-infection" to "hazard of cross-contamination." Delete sodium carbonate and tetrasodium ethylenediamine tetraacetate from the active ingredients. Change your inert ingredients percentages accordingly.
 - j. Include the "Storage and Disposal" heading and add the subheadings Pesticide and Container Disposal. Refer to PR Notice 83-3 for the appropriate storage and disposal statements.
2. 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 Martha DeLaney at (703) 557-3675.

Sincerely yours,


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

Enclosure

Reg no: 10710-6

USE DIRECTIONS:

Disinfection

Use at a concentration of 100 ppm. This product will kill the bacterium *Pseudomonas aeruginosa* FRD 10 at this level. The test was conducted as mandated by the AOAC Use-Dispersion Test. At this level, the product is fungicidal against *Candida albicans*.

Use at a concentration of 100 ppm. Trophy No-Bac C and S will kill *Candida albicans* at this level. The test was conducted as mandated by the AOAC Use-Dispersion Test. At this level, the product is fungicidal against *Candida albicans*.

Use at a concentration of 100 ppm. Trophy No-Bac C and S will kill *Candida albicans* at this level. The test was conducted as mandated by the AOAC Use-Dispersion Test. At this level, the product is fungicidal against *Candida albicans*.

PHENOL COEFFICIENTS

Guaranteed	Minimum
1	14
1	18

TROPHY

NO-BAC C AND S

**CLEANER • DEODORIZER /
DISINFECTANT • FUNGICIDE**

Designed for Hospital and Institutional Use

ACTIVE INGREDIENTS

n-Alkylbenzyl dimethylammonium chloride	10.0%
Dimethylbenzyl dimethylammonium chloride	10.0%
n-Alkylbenzyl dimethylammonium chloride	10.0%
ethylbenzyl dimethylammonium chloride	10.0%

INERT INGREDIENTS

95.50%

EPA Est. No. 10010-011
EPA Reg. No. 1-2100

CONTENTS
1 GALLON

WARNING

Keep Out of Reach of Children. See right side panel for additional precautionary statements.

PURDY PRODUCTS INC
Milwaukee, Wisconsin 53208

ACCEPTED
with COMMENTS
in EPA Letter Dated:

001 17 1988

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