

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PM
11/1/90
1/1/91

AUG 1 1990

Brulin Corporation
2920 Dr. Andrew J. Brown Avenue
P.O. Box 270
Indianapolis, IN 46206

Attention: Shirley Russell

Gentlemen:

Subject: Brulin CDQ
EPA Registration No. 106-44
Your Resubmission Dated May 8, 1990

Regarding the above-mentioned submission, which was in response to the Agency's letter of April 27, 1990, the following comments apply.

Product Chemistry

The removal of Essential Oils and Monoethanolamine from the active ingredients and including them with the inert ingredients is in compliance with current EPA Label Improvement Programs and is acceptable.

The revised Confidential Statement of Formula agrees with the label and is acceptable.

All alternate sources of supply listed for the active ingredients are satisfactory.

Labeling

The new revised labels which are associated with the subject amendment are acceptable subject to the following comment. (A stamped copy of the labeling is enclosed for your records).

- Please note that the correct carbon chain length distribution for the first active ingredient listed on the label is n-Alkyl (60% C-14, 30% C-16, 5% C-12, 5% C-18) dimethyl benzyl ammonium chloride. Please correct this accordingly.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

Submit five (5) copies of the finished labeling before releasing
the product for shipment.

Sincerely yours,



Walter C. Francis
Acting Product Manager (32)
Antimicrobial Program Branch
Registration Division (H7505C)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

Keep out of reach of children. Corrosive. 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 or fatal if swallowed or absorbed through the skin. Avoid contamination of food.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

This product must be kept under locked storage sufficient to make it inaccessible to children or persons unfamiliar with its proper use.

- Do not contaminate water, food, or feed by storage or disposal.
- Open dumping is prohibited.
- Do not reuse empty container.
- Store in a dry place no lower in temperature than 50° F. or higher than 120° F.

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 instruction, 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 incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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.



CDQ

**DISINFECTS, DEODORIZES AND CLEANS IN ONE
OPERATION FOR ALL HOSPITAL FURNISHINGS AND
OTHER WASHABLE SURFACES**

ACTIVE INGREDIENTS:

n-Alkyl (80% C ₁₂ , 20% C ₁₄ , 5% C ₁₆)	1.0%
dimethyl benzyl ammonium chlorides	1.0%
n-Alkyl (65% C ₁₂ , 32% C ₁₄)	1.0%
dimethyl ethylbenzyl ammonium chlorides	1.0%
INERT INGREDIENTS	96.0%
Total	100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

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 milk, egg whites, gelatin solution; or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician immediately.

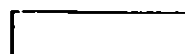
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsion may be needed.

SEE LEFT PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

E.P.A. REG. NO. 106-44

E.P.A. EST. NO. 106-IN-1

NET CONTENTS



U.S. GALLONS

Manufactured and Sold by:

BRULIN & COMPANY, INC.

1-800-776-7149

Indianapolis, IN Richmond, CA Tampa, FL

The outstanding quaternary disinfectant and sanitizer.

Brulin's CDQ For normal disinfection of washable surfaces using only one application while handling.

- Use at 4 oz per gallon
 - Use at 2 oz per gallon
- Outstanding cleaning performance on metal equipment and leather wax from floors.

ACCEPTED with CONFIDENCE in EPA Letter

ADD #1

Under the Federal Fungicide, and Disinfectant Act, registered under

06-94