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Reg # 106-44

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 31 1995

Brulin & Company, Inc.
2920 Dr. Andrew J. Brown Avenue
P.O. Box 270
Indianapolis, IN 42606

Attention: Berma Zootman
Compliance/Regulatory Affairs Manager

Subject: Brulin CDQ
EPA Registration No. 106-44
MOU Compliance Amendment dated July 24, 1995

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended will be acceptable provided that you make the labeling change listed below before you release the product for shipping bearing the amended label.

1. Remove Essential Oils and Monoethanolamine from the active ingredients column. These chemicals were incorporated into the inerts category in the August 1, 1990 Agency letter.
2. Remove the term "outstanding" from the statement, "The outstanding action of CDQ is due to a combination of quaternary ammonium disinfectant..." and everywhere else it appears on the label. This is an unqualifiable marketing term and is not acceptable.
3. List a minimum contact time of 10 minutes for disinfection against the listed microorganisms.
4. If this product is a premise disinfectant for environmental surfaces and is not used on non-critical medical devices or medical equipment surfaces, compliance with PR-Notice 94-4 is not required.

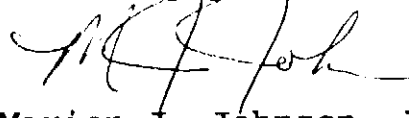
A stamped copy of your labeling is enclosed for your records. Submit five (5) copies of the final label prior to releasing the product for marketing.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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If you have any questions concerning this letter, please contact Wanda Mitchell at (703) 305-6141.

Sincerely yours,



Marion J. Johnson, Jr.
Product Manager (31)
Antimicrobial Program Branch
Registration Division (7505C)

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CDQ

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

ACTIVE INGREDIENTS:

n-Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈)	
dimethyl benzyl ammonium chlorides	1.6%
n-Alkyl (68% C ₁₂ , 32% C ₁₄)	
dimethyl ethylbenzyl ammonium chlorides	1.6%
Essential Oils	0.6%
Monoethanolamine	3.5%
INERT INGREDIENTS	92.7%
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.

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.

Manufactured and Sold by:
BRULIN & COMPANY, INC.

1-800-776-7148

Indianapolis, IN Richmond, CA Tampa, FL

E.P.A. Reg. No. 106-44

55-A

ACCEPTED
with COMMENTS
in EPA Letter Dated:
OCT 21 1995

E.P.A. Est. No. 105-IN-1

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 106-44

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DIRECTIONS FOR USE

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

The outstanding action of **CDQ** is due to a combination of quaternary ammonium disinfectant, a biodegradable detergent and synergizing builders.

BRULIN'S CDQ is a concentrate and must be diluted before use. For normal cleaning and disinfecting, use 2 to 4 ounces per gallon of water. Floors should be mopped with this solution, using only clean mops. Other hard surfaces: wipe with clean rags, or use hand scrub brush. Wear rubber or plastic gloves while hand scrubbing and rinsing.

- Use at 4 oz. per gallon to kill *Ps. aeruginosa*.
- Use at 2 oz. per gallon to kill *S. aureus* and *S. choleraesuis*.

Outstanding rinsability, moderate foam height and synergized cleaning make **CDQ** outstanding for most washable surfaces including composition, terrazzo and marble floors; glass and metal equipment, and painted and varnished surfaces; vinyl and leather upholstery. Removes heavy soils and even strips wax from floors.

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either in or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

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.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
OCT 21 1995

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

06-44