

106-44

1064

Berma L. Johnson
Compliance/Regulatory Affairs Manager
Brulin & Company, Inc.
P.O. Box 270
Indianapolis, In. 46206

JUL 15 2011

Subject: **Brulin CDQ**
EPA Registration Number 106-44
Application Dated April 18, 2011
EPA Received Date April 25, 2011

Dear Ms. Johnson:

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

Proposed Amendment:

- Label amendments

Labeling:

1. Revise the phrase under the product name to read: "...and other *hard non-porous* surfaces."
2. Under the "PRECAUTIONARY STATEMENTS" delete "Keep out of reach of children".
3. Revise the "PRECAUTIONARY STATEMENTS" to read as follows:

"Corrosive. Causes irreversible eye damaged and skin burns. Do not get in eyes, on skin, or on clothing. Harmful if swallowed or absorbed through the skin. Wear protective eyewear (goggles, face shield or safety glasses), protective clothing and protective gloves (rubber, chemical resistant) when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse."

CONCURRENCES

SYMBOL	7510P							
SURNAME	S. Johnson							
DATE	7/13/11							

4. Under the "ENVIRONMENT HAZARDS" revise to read " *This pesticide is toxic to fish, and aquatic invertebrates. Do not discharge...* "
5. On page 2 delete "biodegradable detergent" and replace with "cleaner".
6. Under the "DIRECTIONS FOR USE" delete the words "should" replace with "must". This occurs 2 times in this section.
7. Under the bullets spell out the complete name (genus and species) of the organisms.
8. The 2nd paragraph delete the word "most" and add "*sealed hard non-porous*" surfaces including "*composite.*"
9. Add the heading "Pesticide Storage" to the section beginning: "This product must be kept..."

General Comments:

Your Application for Pesticide does not indicate the sizes of the packages in which this product is marketed. Submit a revised application for pesticide which includes the package information and revised labeling which includes language for the disposal of all appropriate packages.

A stamped copy of the acceptable labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

Sincerely,



Velma Noble
 Product Manager (31)
 Regulatory Management Branch I
 Antimicrobials Division (7510P)

Enclosure: Stamped Label

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

BRULIN CDQ

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

ACCEPTED with COMMENTS in EPA Letter Dated: JUL 15 2011

ACTIVE INGREDIENTS	
n-Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈)	
dimethyl benzyl ammonium chlorides.....	1.65%
n-Alkyl (68% C ₁₂ , 32% C ₁₄)	
dimethyl ethylbenzyl ammonium chlorides.....	1.65%
INERT INGREDIENTS	<u>96.70%</u>
TOTAL	100.00%

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

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. **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 eye. 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 SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

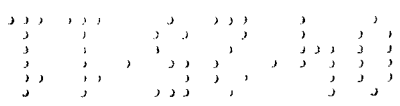
DANGER. Keep out of reach of children. Corrosive. Causes severe eye and skin damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed or absorbed through the skin. Avoid contamination of food.

ENVIRONMENTAL HAZARDS. (If 5 gallon or larger.)

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.

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

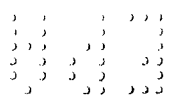
E.P.A. Est. No. 106-IN-1



Manufactured by:
BRULIN & COMPANY, INC.
1-800-776-7149

INDIANAPOLIS IN □ TAMPA FL □ RICHMOND CA

44-D
April 2011



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

DIRECTIONS FOR USE

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

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*.

Treated surfaces should remain wet for 10 minutes.

Rinsability, moderate foam height and synergized cleaning make CDQ effective on 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 into 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 preclean 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 E.P.A. Regional Office for guidance.

CONTAINER DISPOSAL

NONREFILLABLE CONTAINER. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available.

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Net Contents: _____

Batch No. _____

