

JUN 27 1990

James Varley & Sons, Inc
1200 Switzer Ave.
St. Louis, MO 63147

Product Name: Anti-Staph The Triple Threat
Registration Number 421-378
Application Dated 4/2/90

The amendment referred to above, submitted in connection with registration under FIFRA, is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- a. Delete the "Phenol Coefficient" statement from the label.
- b. Delete [redacted] and "[redacted]" from the active ingredient. These are considered inert. Adjust your inert percentages accordingly.
- c. The signal word "DANGER" must be placed immediately below the Child Hazard Warning Statement.
- d. Revise the statement "See first Aid and cautionary statements on back panel" to read: "See back panel for precautionary statements."
- e. On the back panel, above the word "DANGER" include a precautionary statement to read:

Precautionary Statements
Hazards To Humans and Domestic Animals

BEST AVAILABLE COPY

f. Change the word "FIRST AID" to read: "Statement of Practical Treatment."

60867:I:DeLaney:LL-18:KENCO:06/11/90:07/11/90:de:sw:vo:ek:da

CONCURRENCES

SYMBOL							
SURNAME	DeLaney						
DATE	6/14/90						

- g. Delete the word "milk."
 - h. Revise the statements "Reduces the hazard of cross-infection ..." to read "Reduces the hazard of cross-contamination ...".
 - i. Include a contact time for the disinfection section.
 - j. Indicate the specify method of Applications, (i.e., apply using mops, sponge, cloth, etc.). Refer to the enclosed DIS/TSS-15 for further guidance.
 - k. Under heading "For Ordinary Cleaning", delete "Extremely soiled surfaces may require more per gallon of water" to read "For heavily soiled areas, a preliminary cleaning is required. Prepare a fresh solution daily or when use solution becomes visibly dirty."
 - l. Under "NOTE To Physician," delete the last sentence starting with "Measure against circulatory ...".
 - m. Revise "Causes eye damage and severe skin irritation" Corrosive. Causes eye and skin damage.
2. We have adjusted our records to reflect the new product name change.

OLD: Anti-Staph

NEW: Anti-Staph The Triple Threat

3. Submit five (5) copies of your final printed labeling before you release the product for shipment.


If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). 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) 557-6982.

Sincerely yours,

BEST AVAILABLE COPY

John H. 
Product Manager (31)
Antimicrobial Program Branch
Registration Division (H7505C)

SAFE

ACCEPTED
with COMMENTS
in EPA Letter Dated

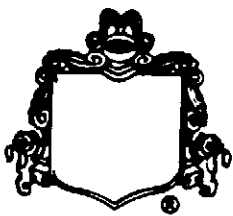
JUN 27 1990

BEST

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

421-378

Precautionary Sta
Hazards To Human
animals



ANTI-STAPH

THE TRIPLE THREAT

Cleans - Disinfects - Deodorizes

ACTIVE INGREDIENTS

1,4-Dioxane	1.25
2,4-Dichloro-6-Tert-Butyl-4-Nitrophenol	1.25
2,4-Dichloro-6-Tert-Butylphenol	1.25

INERT INGREDIENTS

EPA Reg. No. 421-378 EPA Est. No. 421-MO-1

DANGER:

(See first aid & cautionary statements on back panel)

KEEP OUT OF REACH OF CHILDREN

NET CONTENT: 32 FL. OZS. (1 QUART)

2.50%

97.50%

CODE #1002

ANTI-STAPH

Cleans - Disinfects - Deodorizes

DANGER: KEEP OUT OF REACH OF CHILDREN

CORROSIVE. CAUSES EYE DAMAGE & SKIN IRRITATION. WEAR GOGGLES OR FACE SHIELD & RUBBER GLOVES. WASH HANDS THOROUGHLY WITH SOAP & WATER AFTER USE. AVOID CONTACT WITH CLOTHING. OR FATAL IF SWALLOWED. AVOID CONTAMINATION OF FOOD & FEEDSTUFFS.

FIRST AID: In case of contact immediately flush eyes or skin with plenty of water. If swallowed, call a physician. Remove and wash contaminated clothing before re-use. If inhaled, get fresh air. If necessary, call a physician. If these are not available, use 1% solution of egg whites, gelatin solution or if these are not available, use 1% solution of alcohol. Call a physician.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE.

STORAGE: Keep container closed when not in use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product should be disposed of in an approved waste disposal facility.

CONTAINER DISPOSAL - Metal Containers: Triple rinse (or equivalent) and recycle where possible. If not, puncture and dispose of in a sanitary landfill, or by other means approved by local and state authorities.

Plastic Containers: Triple rinse (or equivalent) and recycle where possible. If not, puncture and dispose of in a sanitary landfill, or by other means approved by local and state authorities.

Local authorities: by burning if burned stay out of smoke.

NOTE TO PHYSICIAN: Probable mucosal damage may occur.

DIRECTIONS FOR USE - For Ordinary Cleaning: Mix 1 part of product with 64 parts of water (1 gallon of water). Extremely soiled surfaces may require more product. Rinse surfaces with appropriate cleaning apparatus. Remove excess solution.

Deodorizing: Prepare solution of 1 part to 64 parts of water. Apply to surfaces to be deodorized. Provide adequate disinfecting action and apply for 10 minutes. Rinse treated food surfaces or equipment with water.

This product is specifically formulated for use as a multi-purpose cleaning, disinfecting and deodorizing agent. Exerts quality cleaning, disinfecting and deodorizing action. Recommended for cleaning and disinfecting of all types of floors, walls, ceilings, and equipment. Bathroom fixtures such as toilet bowls, urinals, wash basins and trays. This product is non-volatile, non-corrosive to most materials.

Highly effective against a wide variety of microorganisms. Recommended for use on sickroom, hospital, and institutional buildings. Highly effective against a wide variety of microorganisms. Recommended for use on sickroom, hospital, and institutional buildings. Highly effective against a wide variety of microorganisms.

cross-infection in buildings, factories, hospitals and institutions. A Product of

JAMES VARLEY & SONS
ST. LOUIS, MO 63147
1-800-325-3303

NOT REVIEWED

In Accordance with FR Notice 99-4.
Based on Draft Labeling Dated 8/17/98

PRECAUTIONARY STATEMENTS

Hazardous to Humans and Domestic Animals

DANGER: Corrosive. Causes eye and skin damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield & rubber gloves when handling. Harmful or fatal 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, promptly drink a large quantity of egg whites, gelatin solution or if these are not available drink large quantities of water. Avoid alcohol. Call a physician.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL.

STORAGE: Keep container closed when not in use.

PESTICIDE DISPOSAL: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL—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.

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.

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



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