

SEP 07 2000

DiverseyLever  
3630 E. Kemper Road  
Cincinnati, OH 45241

Subject: D-Trol  
EPA Registration No. 875-187  
Amendment Date: June 7, 2000

Attn: Terry Sabatelli  
Registration Specialist

The amendment, referred above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you address the following comments before this product is released for shipment.

1. You will need to delete the "Algaecide" claim. You do not have directions on how this product works as an algaecide. You may want to amend the current label by adding specific directions and use sites.
2. The "Statements of Practical Treatment" will need to be updated in accordance with PR Notice 2000-3. (For guidance: [www.epa.gov/opppmsd1/PR\\_Notices/pr2000-3.pdf](http://www.epa.gov/opppmsd1/PR_Notices/pr2000-3.pdf))
3. The Precautionary Statements will need to be updated according to the Label Manual 3<sup>rd</sup> Edition by stating :

*Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses), protective clothing, and rubber gloves. Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.*

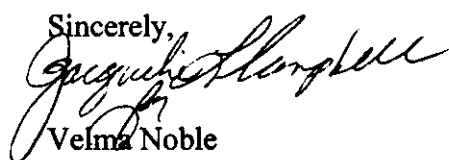
4. On the left panel, delete the heading "Precautionary Statements (continued)."
5. According to PR Notice 83-3, all pesticide products are required to have storage instructions with an appropriate heading. The section should be placed immediately after the statement, "Do not contaminate water, food, or feed by storage and disposal."

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

- 6. Under the "Sanitizing Directions," you will need include the sanitization immoveable hard, non-porous food contact surfaces such as tables, counters, food processing equipment. The section should be revised as follows:
  - a. Pre-flush or pre-scrape utensils, glasses, and hard, non-porous surfaces to remove gross food particles. Pre -soak if necessary. Then thoroughly was surfaces with detergent followed by a potable water rinse. Tilt all moveable surfaces for proper drainage.
  - b. Sanitize in 200 ppm solution (1/4 oz. per 1 gal. of water.) Immerse utensils, glasses, plates for at least 2 minutes. Thoroughly wet immovable surfaces using cloth, spray or sponge for 2 minutes.
  - c. Place sanitized utensils, glasses, plates on rack or drain board to air dry. Let immovable surfaces drain and air dry. Do not rinse. Do not wipe. Prepare a fresh solution daily.
- 7. Under "For Disinfecting," you must revised this section by stating "*Remove gross filth or heavy soil prior to application of product. Mix 3/4 ounces of product per 1 gallon of water (600 ppm). Allow surfaces to remain wet for 10 minutes. All surfaces to air dry.*"
- 8. Under "Microbiological Data" you must be revised by stating "D-Trol sanitizes against *Staphylococcus aureus* (ATCC 6538), *Escherichia coli* (ATCC 11229), *Pseudomonas aeruginosa* (ATCC 15442) and *Listeria monocytogenes* (ATCC 15313) on food contact surfaces in 2 minutes using 1/4 oz per 1 gallon of water (200 ppm).
- 9. The Agency would like to notify you that we are in the process of developing a policy regarding the use of "hand sanitizing" claims on pesticide labels. We feel that these claims are outside the Agency's jurisdiction and should be deleted. Once we have completed the policy, you will be notified of our decision.

A stamped copy of the label is enclosed for your records. You will need to submit one copy of the final printed label to the Agency before you release this product for shipment. If you have any questions regarding this letter, please contact Zenobia Jones at (703) 308-6198.

Sincerely,  
  
 Velma Noble  
 Product Manager 31  
 Regulatory Management Branch I  
 Antimicrobials Division (7510C)



DiverseyLever®

### PRECAUTIONARY STATEMENTS (continued)

**ENVIRONMENTAL HAZARDS:** 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.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not use, pour, spill or store near heat or open flame. This product is corrosive to mild steel. Do not store or transport in unlined metal containers. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

### STORAGE AND DISPOSAL:

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL. OPEN DUMPING IS PROHIBITED. DO NOT REUSE EMPTY CONTAINERS. IF FUSED, TAP AND MIX TO BE REUSABLE.

**PESTICIDE RESPONSE:** 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 instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**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.

**GENERAL:** Consult Federal, State or local disposal authorities for approved alternative procedures.

### DIRECTIONS FOR USE:

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

For Final Sanitizing Rinsing in Food Plants

For Sanitizing Equipment in Meat and Poultry Plants

To sanitize utensils and equipment in hand wash, sink, and spray wash operations.

1. Pre-rinse or pre-scrape utensils and glasses to remove gross food particles. Pre-rinse if necessary.
2. Wash thoroughly with a DiverseyLever Detergent.

HEALTH-3, FLAMMABILITY-1, REACTIVITY-0, PERSONAL PROTECTION-0



SKU# 99902470

BATCH/LOT#

# D-TROL

## DISINFECTANT, SANITIZER AND ALGAEICIDE

### For Industry Use

#### ACTIVE INGREDIENT(S):

n-Allyl (60% C14, 30% C18, 5% C12, 5% C12)	
dimethyl benzyl ammonium chloride	5.25%

n-Allyl (60% C12, 30% C14)	
dimethyl ethyl benzyl ammonium chloride	5.25%

<b>INERT INGREDIENT(S):</b>	90.50%
<b>TOTAL:</b>	<b>100.00%</b>

## KEEP OUT OF REACH OF CHILDREN DANGER

#### STATEMENT OF PRACTICAL TREATMENT:

In case of contact, flush eyes or skin with plenty of water for at least 15 minutes. For eyes call a physician. Remove contaminated clothing and wash before reuse. If swallowed, drink promptly a large quantity of milk, egg whites or gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician immediately.

**NOTE TO CONTRACTOR:** Prohibit animal access to and contamination of the use of product tanks. Reservoirs against circulatory shock, respiratory depression, and convulsions may be avoided.

## PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

## DANGER

**CORROSIVE:** Causes eye damage and skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful if swallowed. Avoid contact with food.

NET CONTENTS: 55 GAL (206.2 L)

DiverseyLever • 3830 E Kemper Rd • Cincinnati OH 45241-2046 • 800 233 1000  
24 Hr EMERGENCY TELEPHONE:  
Medical: (Call Collect) 303 562 1024 • Transportation: (CHEMTREC) 800 424 9300

3/4

ver®

**DIRECTIONS FOR USE (continued)**

- 3. Rinse with potable water.
  - 4. Sanitize in a solution of 200 ppm Quat (1/4 oz. per 1 gal. of water). Immerse all utensils and glasses for at least 2 minutes. If spraying, keep surface wet with sanitizer for at least 2 minutes.
  - 5. Place sanitized utensils on a rack to air dry. Adequately drain all surfaces before contact with food.
- For hand wash operations, fresh sanitizing solution must be prepared at least daily, prepare more often if the solution becomes diluted or soiled. Solution used in spray operations may not be re-used for sanitizing. Only 1 sanitization per solution is allowed. The solution may be used for cleaning or other purposes if it is not soiled.

**APPLICATIONS:** After cleaning surfaces with suitable detergent and rinsing, the sanitizing solution of D-Trol may be applied by soaking, spraying with suitable spray equipment, a clean mop or clean sponge.

**FOR DISINFECTING IN HOSPITALS AND REST HOMES:** Clean equipment with a suitable detergent and rinse. For disinfecting hard surfaces such as floors, walls, furnishings and carts use 3/4 ounces of D-Trol per 1 gallon of water (600 ppm quat). For disinfecting porous surfaces use 1 1/2 ounces of D-Trol PER 1 GALLON OF WATER (1200 ppm Quat).

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 pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high-level disinfection. D-Trol complies with 21 CFR 178.1070. Sanitizing Solutions Food Additive Law for final sanitizing rinsing of food processing equipment and on food contact surfaces in bars and restaurants.

**HAND AND GLOVE SPRITIZING:** Wash hands or gloves with warm water and soap. Rinse with potable water. Prepare a solution containing 1/4 ounce D-Trol per gallon of water providing 200 ppm quaternary. Immerse hands or skin to completely wet skin or surface to above wrist area. Drain and wipe with a single service towel. DO NOT rinse hands or gloves with potable water unless required by regulating authorities. Test sanitizer solution with a test kit. Discard used solution daily or more often if it becomes diluted or soiled.

**MICROBIOLOGICAL DATA:**  
Official A.O.A.C. Procedures, 14th Edition, 1960.  
Hard water tolerance: in the presence of hard water (750 ppm), Staphylococcus aureus (ATCC No. 6538) Escherichia coli (ATCC No. 12228) and Listeria monocytogenes (ATCC No. 53143) are reduced in 30 seconds with 1/4 ounce solution of D-Trol disinfectant/sanitizer per gallon of water (200 ppm Quat).

EPA Registration No. 875-187  
EPA Establishment No. 4313-TX-1(12); 48282-WA-1(27)  
875-08-1(58); 875-PA-1(88); 875-XI-1(10)  
4313-TX-1(12); 875-CA-4(88); 48282-WA-1(27)

Made in USA

**ACCEPTED**  
**with COMMENTS**  
**in EPA Letter Dated:**

SEP 07 2000 2000

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 875-187