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OHOL/2010 UNITED STATES ENVIRONMENTAL PROTECTIO GENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



United States Environmental Protection Office of Pesticide Programs

Kresti A. Lyddon, Johnson Diversity, 8310 16th St. P.O Box 902 Sturtevant, WI 53177-0902

JUL -1 2010

Subject:

Product Name: EPA Registration No.: Date Submitted: EPA Receipt Date: Submission #: D-Trol 875-187 April 1, 2010 April 2, 2010 871494

Ms. Lyddon,

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

Proposed Amendment:

1. Removal of disinfectant claim from label.

Stamped Label

General Comments

Hand sanitizing is regulated by FDA not EPA. Please remove, "Hand Sanitizing" from the label. A stamped copy of the accepted labels is enclosed. Please submit three (3) copies 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 Velma Noble, PM Team 31 at (703) 308-6233 or Jamil Mixon at (703) 308-8032.

Sincerely,

Velma Noble

Product Manager, Team 31 Regulatory Management Branch Antimicrobials Division (7510P)

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EPA Form 1320-1A (1/90)

Enclosure:

OFFICIAL FILE COPY



D-Trol

Disinfectant, Sanitizer

For Industry Use

ACTIVE INGREDIENTS:	
n-Alkyl (60% C14, 30% C16, 5% C18, 5% C12) dimethyl benzyl ammonium	
chlorides	5.25%
n-Alkyl (68% C12, 32% C14) dimethyl ethyl benzyl ammonium chlorides	5.25%
OTHER INGREDIENTS:	
TOTAL:	

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

IN CASE OF EMERGENCY, CALL A POISON CONTROL CENTER OR DOCTOR FOR TREATMENT ADVICE.

Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.

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

See additional precautionary statements on back (side) (left) (right) (panel) (of) (label) (below) $\int_{c}^{c} \int_{c}^{c} \int_{c}$

NET CONTENTS:

ACCEPTED with COMMENTS in EPA Letter Dated:

JUL 1 = 2010]

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

April 1, 2010 EPA Reg. No. 875-187 Page 1 of 4

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Product of XXXX

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
- 1. Pre-flush or pre-scrape utensils, glasses, and hard, non-porous surfaces to remove gross food particles. Pre-soak if necessary. Then thoroughly wash surfaces with detergent followed by a potable water rinse. Tilt moveable surfaces for proper drainage.
- 2. Sanitize in 200 ppm solution (1/4 oz per gal. of water). Immerse utensils, glasses, and plates for at least 2 minutes. Thoroughly wet immovable surfaces using cloth, spray, or sponge for 2 minutes.
- 3. Place Sanitized utensils, glasses, and plates on rack or drain board to air dry. Do not rinse. Do not wipe. Prepare a fresh solution daily.

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 one (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, this product by soaking, spraying with suitable spray equipment, a clean mop or clean sponge.

FOR DISINFECTING IN HOPITALS AND REST HOMES:

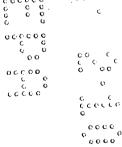
Remove gross filth or heavy soil prior to application of product. Mix ¾ ounces of product per 1 gallon of water (600 ppm). Allow surface to remain wet for 10 minutes. Allow surfaces to air dry.

(Note to reviewer: This paragraph will be used only on labels that list semi-critical devices as defined by FDA.) (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 blood stream 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.)

a solution containing 1/4 ounce of this product per gallon of water providing 200 ppm quaternary. Immerse hands and to completely wet the surface to above wrist area. Drain and wipe with a single service towel. DO NOT rinse hangs 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:

This product 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 ¼ oz. per gallon of water (200 ppm).



PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin, 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 and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE

(Keep from freezing). If frozen, thaw and make useable. Open dumping is prohibited.

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

CONTAINER DISPOSAL:

NONREFILLABLE SEALED CONTAINERS: Note to reviewer: Several of our packaging options are sealed containers or bottles designed to reduce worker exposure to the concentrate. None of these can be triple rinsed because they are closed sealed containers. The following text will be used on these sealed container types:

Nonrefillable container. Do not reuse or refill this container. Wrap empty container and put in trash.

NONREFILLABLE NON-RIGID CONTAINERS: Note to reviewer: Several of our packaging options are Bag-in-Box containers (a plastic bag liner supported inside a box) or are flexible bag-type containers (such as ACCUPACK™ Containers). These flexible containers are exempt from the triple rinsing requirements. The following text will be used on these container types:

Nonrefillable container. Do not reuse or refill this container. Wrap empty container and put in trash.

NONREFILLABLE READY-TO-USE FORMULATIONS: Note to reviewer: The following text will be used on nonrefillable RTU container labels:

Nonrefillable container. Do not reuse or refill this container. Wrap empty container and put in trash.

SMALL NONREFILLABLE CONTAINERS: Note to reviewer: The following text will be used on rigid, nonrefillable containers small enough to shake (5 gallons or smaller):

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. Fill the container 1/2 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.

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LARGE NONREFILLABLE CONTAINERS: Note to reviewer: One of the following paragraphs will be used on labels for rigid, nonrefillable containers too large to shake (larger than 5 gallons):

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. Fill the container ¼ full with water and replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for at least 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for reconditioning, if appropriate.

OR

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or a mix tank or collect rinsate for later use or disposal. Insert pressure-rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for reconditioning, if appropriate.

<u>REFILLABLE CONTAINERS</u>: Note to reviewer: One of the following paragraphs will be used on labels for refillable containers:

Refillable container. Refill this container with (this brand or brand name pesticide) only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

OR

Pressure rinsing the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container prior to final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

ENVIRONMENTAL HAZARDS (for containers of 5 gallons or 50 lbs. or more) 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 agency 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, or store near head or open flame. This prodect 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.

EPA Registration No. 875-187 EPA Establishment No. (Lot code letters indicate manufacturing location) (MSDS Ref. No. XXXXXXXXXX)

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