

1561-13

8-18-2003
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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AUG 18 2003

Mr. William Edwards
President
Edwards-Councilor Co., Inc.
1427 Baker Road
Virginia Beach, VA 23455

SUBJECT: QAC 100 Powdered Quat
EPA Registration Number: 1561-13
Application Dated: May 14, 2003
Receipt Date: May 20, 2003

Dear Mr. Standley:

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

- Update as per PR Notice 2001-1

Conditions

1. The following statement requires revision as it is too broad. Revise: "For Manufacturing Use Only" to read: "*For Use by manufacturers only in formulating antimicrobial products for the uses indicated on the label.*"

2. Revise the label by moving the signal word "Danger" so that it is on a separate line immediately below the: "Keep Out of Reach of Children" statement.

CONCURRENCES							
SYMBOL	J. Edwards						
SURNAME	7510C						
DATE	8/14/03						

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3. Revise the "Precautionary Statements" to read exactly as follows:

"Precautionary Statements"
Hazards to Humans and Domestic Animals

Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled, *swallowed or absorbed through the skin*. Do not get in eyes, on skin, or on clothing. Do not breath vapor or spray mist. *Wear a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, r, P or HE filter.* Wear goggles or face shield, protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse."

4. Reorder the First Aid statements such that they are listed in the order of most toxic route of exposure to least. Thus place in the following order: "If in eyes," "If on skin or clothing," "If swallowed," "If Inhaled."

5. Revise the "Directions for Use" section. According to the Agency records, this active ingredient is not approved for "institutional premise." Delete this site from you label.

6. Revise the "Storage and Disposal" section as follows:

A. Delete the subheading: "Prohibitions" and place the statement beginning: "Do not contaminate water, food..." such that it is immediately below the heading: "Storage and Disposal".

B. Revise the subheading: "Storage" to read "Pesticide Storage."

C. Revise the "Container Disposal" statement as follows to be in agreement with PR Notice 83-3: "Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application or other equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner."

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General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one 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 Tracy Lantz at (703) 308-6415.

Sincerely,



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

QAC 100 POWDERED QUAT

ACCEPTED
FOR MANUFACTURING USE ONLY with COMMENTS
in EPA Letter Dated:

ACTIVE INGREDIENT: n-Alkyl (C14 95%, C12 3%, C16 2%) dimethyl benzyl
ammonium chloride dihydrate.....100%

Aug 18 2003

DANGER - KEEP OUT OF REACH OF CHILDREN
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
Registered under EPA Reg. No. 1561-13

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS. CORROSIVE - Avoid contact with eyes, skin, or clothing. Contact with this product causes severe eye and skin damage. Inhalation will cause respiratory irritation. Wear chemical, goggles, face shield, protective clothing, and rubber gloves when handling. Harmful or fatal if swallowed. Wash thoroughly with soap and water after handling and before eating. Avoid contamination of food. Remove contaminated clothing immediately and wash completely before reuse.

FIRST AID	
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
If on skin or Clothing	<ul style="list-style-type: none">• 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 in eyes	<ul style="list-style-type: none">• 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 swallowed	<ul style="list-style-type: none">• Call 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 the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

DIRECTIONS FOR USE

It is a violation of Federal Law to use this material in a manner inconsistent with labeling. Formulate into antimicrobial products for use on hard surfaces in agricultural, food handling, and institutional premises or in industrial water systems and swimming pools. Formulators using this product are responsible for providing data for the EPA registration of their formulated products. DO NOT use water containing residue from use of this product to irrigate crops used for food or animal feed.

ENVIRONMENTAL HAZARDS

This pesticide is TOXIC to fish. DO NOT DISCHARGE effluent containing this product into oceans, lakes, streams, estuaries, ponds, or other waters unless in accordance with the requirements of a National Pollution Discharge (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 sewerage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

Avoid contact with anionic materials, soap or sulfated oils.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food, feed, or water by disposal. Open dumping is prohibited.

STORAGE: Store in original container in dry location. Keep from freezing.

SPILL OR LEAK: Small spills may be absorbed and absorbent incinerated or spill flushed away with water if practicable. Large spills should be contained and collected into containers. Dispose according to applicable State or Federal regulatory requirements.

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: Clean fiber drums can be recycled or disposed to sanitary landfill or incineration. Drum liner or fiber drum contaminated with pesticide must be disposed by incineration or according to appropriate State or Federal regulatory requirements.

NET CONTENTS 200 POUNDS

MANUFACTURED BY

EDWARDS-COUNCILOR CO., INC
1427 Baker Road
Virginia Beach, VA 23455

EPA Registration Number 1561-13
Establishment Number 1561-VA-1
CAS No. 68424-85-1