

1561-13

06/17/2010

1/5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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



Office of Pesticide Programs

Robert G. Butz,
Carter Ledyard & Milburn LLP,
701 8th St., N. W., Suite 410,
Washington, DC 20001-3893

JUN 17 2010

Product Name: QAC 100 Powdered Quat
EPA Reg. No.: 1561-13
Notification Date: May 19, 2010
Date Received: May 19, 2010
Submissions #: 875275

Dear Mr. Butz,

This letter acknowledges receipt of your notification submitted under the provision of the Federal Insecticide, Fungicide and Rodenticide Act. (FIFRA) section 3(c)9 and PR Notice 98-10.

Proposed Notification for:

- 1) Update container disposal language

General Comments

Based on a review of the submitted material, your application for pesticide notification for the product "QAC 1000 Powered Quat", EPA Reg. # number 1561-13 is acceptable. A copy of your notification has been placed in our records for future reference.

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)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

Please read instructions on reverse before completing form

Form Approved, OMB No. 2070-0060, Approval expires 5-31-98

	United States	<input type="checkbox"/>	Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/>	Amendment	
	Washington, DC 20460	<input checked="" type="checkbox"/>	Other	

Application for Pesticide – Section I

1. Company/Product Number 1561-13	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) QAC 100 Powdered Quat	PM # 31	
5. Name and Address of Applicant (Include ZIP Code) Edwards-Councilor Co., Inc. 1427 Baker Road Virginia Beach, VA 23455 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg No. Product Name	

Section – II

<input type="checkbox"/> Amendment – Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
 Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Label Code: 20100519

Section III

1. Material This Product Will be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 200 lbs.		5. Location of label directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	<input type="checkbox"/> Other _____	

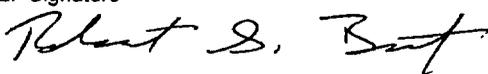
Section IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Robert G. Butz	Title Authorized Agent, Staff Scientist Carter Ledyard & Milburn LLP	Telephone No. (Include Area Code) 202-623-5711

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law

6. Date Application Received

2. Signature 	3. Title Authorized Agent, Staff Scientist Carter Ledyard & Milburn LLP
4. Typed Name Robert G. Butz	5. Date May 19, 2010

(Stamped)

31

3/5

CARTER LEDYARD & MILBURN LLP
Counselors at Law

Robert G. Butz Ph.D.
Staff Scientist

Direct Dial: 202-623-5710
E-mail: butz@clm.com

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(212) 371-2720

May 19, 2010

VIA COURIER

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504 P)
U.S. Environmental Protection Agency
Room S-4900
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Attn: Velma Noble (PM 31)

Re: Notification of Revised Label for QAC 1000 Powdered Quat, EPA Reg. No. 1561-13

Dear Velma,

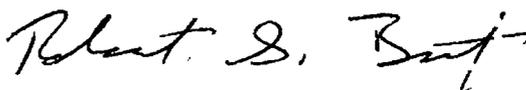
On behalf of Edwards-Councilor Company, Inc., I am notifying the Agency of a revised label for QAC 100 Powdered Quat, a technical product, EPA Reg. No. 1561-13. The container disposal instructions on the label have been revised per the language in PR Notice 2007-4.

Attached please find:

- Application Form with notification statement set forth in PR Notice 2007-4 (EPA Form 8570-1);
- One copy of the proposed product label with changes clearly marked; and
- One copy of the proposed product label.

If you have any questions, please contact me at 202-623-5710.

Sincerely,



Robert G. Butz, Ph.D.

Attachments

RGB

QAC 100 POWDERED QUAT

For Use by manufacturers only in formulating antimicrobial products for the uses indicated on the label

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

KEEP OUT OF REACH OF CHILDREN

DANGER

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 (MSFIA / 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."

FIRST AID	
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 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 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.
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
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- Formulaic into antimicrobial products for use on hard surfaces in agricultural, food handling, 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. DONNOT 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:

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

PESTICIDE 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: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) 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. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other 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 recycling, if available.

5/5

20100519. Label for Container Rule Changes

Notes to reviewer are bracketed []
Statements in parenthesis are optional text ()

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. 69424-85-1

(Batch Code:) [to appear on front or back panel of label or immediate container]