



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 6, 2021

Amanda Burwell  
Regulatory Specialist  
Stepan Company  
22 Frontage Road  
Northfield, IL 60093

Subject: Label and CSF Amendment – Add Alternate CSF 2 and changes to precautionary statements on label  
Product Name: BTC 2125M-80%  
EPA Registration Number: 1839-54  
Received Date: February 24, 2020  
Action Case Number/Decision Number: 00219885

Dear Amanda Burwell:

The amended label and CSF referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. Pursuant to 40 CFR 156.10(a)(6) you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 11/08/2011
- Alternate CSF 2 dated 02/24/2020

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2) If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition,

regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process, FIFRA section 12(a)(1)(B). Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Assurance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, you may contact Joe Daniels via email at [daniels.joseph@epa.gov](mailto:daniels.joseph@epa.gov).

Sincerely,



For Eric Miederhoff  
Product Manager Team 31  
Regulatory Management Branch I  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

Enclosure: Stamped Label

## DIRECTIONS FOR USE

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

### BTC® 2125M-80% IS A CATIONIC MATERIAL.

Only for formulation into antimicrobial products for use in: agricultural/farm premises, structures, buildings, and equipment; dairy farm milk handling facilities, equipment, storage rooms, houses, and sheds; food processing plant, food handling, food distribution equipment and premises; mushroom houses/empty premises and equipment; greenhouses/nurseries premise and equipment; egg handling equipment and rooms, egg washing treatment; poultry processing plant equipment/premises, meat processing plant/equipment, eating establishment premises and equipment; commercial, institutional, and industrial premises and equipment (floors, walls, storage areas); domestic dwellings, food handling areas, bathroom premises (hard surfaces), indoor premises; medical institutional critical care and noncritical care premises and laundry. For formulation into antimicrobial products for use in air conditioner/refrigeration condensate water systems, air washer and industrial scrubbing systems, once-through and recirculating industrial/commercial cooling water systems, pulp/paper mill water systems, swimming pools, fountains/water displays/decorative ponds/standing water, sewage treatment systems, spas, gas/oil drilling muds/packer fluids and gas/oil recovery injection water systems. For formulation into wood preservation, and wood preservative—seasoned wood pressure/thermal treatment and non-pressure treatment (joinery/remedial), and sapstain treatment; materials preservative, paper (stored) and paper-making (nonfood contact). Formulators using this product are responsible for providing data for the EPA registration of their formulated products.

## PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### DANGER

**KEEP OUT OF REACH OF CHILDREN.** Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin or on clothing. Wear goggles or face shield, protective clothing and rubber gloves when handling. May be fatal if inhaled, swallowed or absorbed through skin. Do not breathe vapor. Wear a minimum of a filtering face piece NIOSH approved respirator (TC-84A) with any N filter. Higher level respirators that are NIOSH approved for particulates can also be used. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or use the toilet. Remove contaminated clothing and wash before reuse.

# Stepan

## BTC® 2125M-80%

For formulation into antimicrobial products.

### ACTIVE INGREDIENTS:

Alkyl (60% C <sub>14</sub> , 30% C <sub>16</sub> , 5% C <sub>12</sub> , 5% C <sub>18</sub> ) dimethyl benzyl ammonium chlorides .....	40%
Alkyl (68% C <sub>12</sub> , 32% C <sub>14</sub> ) dimethyl ethylbenzyl ammonium chlorides.....	40%
<b>INERT INGREDIENTS .....</b>	<b>20%</b>
<b>TOTAL</b>	<b>100%</b>

## KEEP OUT OF REACH OF CHILDREN

# DANGER

### FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**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. Call a poison control center or doctor for further treatment advice.

**IF ON SKIN OR CLOTHING:** 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:** 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:** 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.

### HOT LINE NUMBER

You may also contact 1-800-228-5635 for emergency medical treatment information.

### NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

See side panels for additional precautionary statements.

### NET CONTENTS

## ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic invertebrates, oysters, and shrimp. 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 AND CHEMICAL HAZARDS

Do not use or store near heat or open flame. Do not mix with oxidizers, soap, or other anionic materials.

## STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in a dry place no lower in temperature than 50°F or higher than 120°F.

**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. Clean container promptly after emptying. Triple rinse empty container with water. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

FOR FORMULATING/MANUFACTURING USE ONLY

EPA Reg. No. 1839-54  
EPA Est. No. 1839-IL-01

**STEPAN COMPANY**  
22 West Frontage Road  
Northfield, IL 60093 USA

**ACCEPTED**

Dec 06, 2021

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 1839-54

Amended 02/24/2020