

JUL 2 3 2008

Mr. V Goncarovs **Regulatory Affairs Manager** Stephan Company 22 W. Frontage Rd. Northfield, IL 60093

Subject: **BTC® 8358 EPA Registration Number 1839-68** Application Dated May 15, 2008 Received Date May 15, 2008

Dear Mr. Goncarovs:

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

Proposed Amendment:

Revised label as per the Table 13 within the ADBAC RED for Agency review

Label Comment:

Delete the claim "Concentrated Germicide" Your product is a manufacturing use product in which directions for use nor efficacy data has been submitted/cited to support a public health claim such as germicide.

General Comments:

A stamped copy of the acceptable labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

CONCURRENCES								
SYMBOL								
SURNAME								
DATE				******				-

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

Sincerely

Vélma Noble Product Manager (31) Regulatory Management Branch I Antimicrobials Division (7510P)

Enclosure: Label

DIRECTIONS FOR USE

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

BTC® 8358 IS A CATIONIC MATERIAL.

Only for formulation into antimicrobial products for use in: agricultural/farms premises, structures, buildings, and equipment; dairy farm milk handling facilities, equipment, storage rooms, houses, and sheds; food processing plants, food handling, food distribution equipment and premises; mushroom houses/empty premises 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, golf/ commercial turf/lawns. greenhouses/nurseries, fountains/ water displays/decorative ponds/ standing water, sewage treatment systems, spas, gas/oil drilling muds/packer fluids, gas/oil recovery injection water systems, gas/oil pipeline maintenance, and gas/oil fracturing fluid 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 papermaking (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. May be fatal if inhaled. Harmful if absorbed through skin. Do not breathe 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. Do not get in eyes, on skin or on clothing. Wear protective eyewear, clothing and gloves (goggles, face shield, safety glasses 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

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 7 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.



BTC[®] 8358

CONCENTRATED GERMICIDE

For formulation into antimicrobial products.

ACTIVE INGREDIENT:

 Alkyl (40% C12, 50% C14, 10% C16)

 dimethyl benzyl ammonium chlorides

 INERT INGREDIENTS

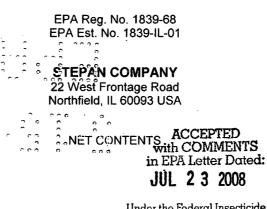
 TOTAL

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panels for additional precautionary statements.

FOR FORMULATING/MANUFACTURING USE ONLY



IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have a 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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic invertebrates, oysters, and shrimp. Do not discharge effluent containing this product intolakes, 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 hazardour Improper disposal of excess pesticide, spray mixture, or rinsate ic. 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: Do not reuse empty container. Triple rinse empty container with water. Return metal drum or offer for reconditioning or recycling (if available) or puncture and dispose of in a sanitary landfill, or by other procedures approved by State or local authorities. Plastic containers may be disposed of in a 'sanitary landfill, incinerated, or if allowed by local authorities, by burning. If burned, stay out of smoke.

RED adbac draft

Amend 05/15/08

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, 18,39-68