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Mr. Thomas W. Isaac Sr. Regulatory Specialist Stepan Company 22 W. Frontage Rd. Northfield, IL 60093

Subject:

10% BTC 2125M Powdered Fabric Softener/Sanitizer

EPA Registration No. 1839-106
Application Date: 4/29/03

Application Date: 4/29/03 Receipt Date: 4/30/03

JUL 29 2003

Dear Mr. Isaac:

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

Update First Aid Statements

LABEL COMMENTS

As stated on the Agency November 15, 2000 letter, we are in the process of re-evaluating use of phrases such as "residual self sanitizing" in the description of non-public health claims. The use of terms such as sanitizing, sanitization, sanitizes,, imply public health benefits and need to be supported by the appropriate efficacy data. During our reregistration process, you will likely be asked to either revise the claims or provide efficacy data to support the claim.

GENERAL COMMENTS

A stamped copy of the accepted labeling is enclosed. 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 Zenobia Jones at (703) 308-6198.

Sincerely,

Velma Noble

Product Manager 31

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BURNAME) 7 17403

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EPA Form 1320-1A (1/90)

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"U.S. Government Printing Office: 1992 - 422-499406?

10% BTC 2125[®]M Powdered Fabric Softener/Sanitizer

Fabric Softener Concentrate, Residual Bacteriostatic and Residual Self-Sanitizer under conditions of high humidity or wet contamination for prevention of odors.

ACTIVE INGREDIENTS

n-Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈)	
dimethyl benzyl ammonium chlorides	5.0%
n-Alkyl (68% C ₁₂ , 32% C ₁₄) dimethyl	
ethylbenzyl ammonium chlorides	5.0%
INERT INGREDIENTS	90.0%
Total	100.0%

DANGER

See side panels for additional precautionary statements.

EPA REG. NO. 1839-106 EPA EST. NO. 1839-IL-01

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 2 9 2003

Under the Federal Insecticide,
Under the Federal Insecticide,
Fungicide, and Rodenholde Act as
Fungicide, and Rodenholde,
amended, for the pesticide,
registered under EPA Reg. No. 1839, 106

STEPAN COMPANY

22 West Frontage Road Northfield, IL 60093

NET CONTENTS

(Center Panel)



DIRECTIONS FOR USE

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

10% BTC 2125[®]M Powdered Fabric Softener/Sanitizer is a concentrated formulation designed for use in commercial laundry operations by addition to the final rinse cycle.

The residual self-sanitizing activity reduces the number of odor causing bacteria from wet contamination.

Residual self-sanitizing level of bacterial control

Add 4 ounces of this product per 100 lbs. of dry laundry to the final rinse cycle water.

At this rate, this product provides, to the fabric, a residual <u>self-sanitizing</u> activity against odor-causing Gram positive and Gram negative organisms under conditions of high relative humidity or wet contamination.

Residual bacteriostatic level of bacterial control

Add 16 ounces of this product per 100 lbs. of dry laundry to the final rinse cycle water.

At this rate, this product provides, to the fabric, a residual <u>bacteriostatic</u> activity against odorcausing Gram positive and Gram negative organisms under conditions of high relative humidity or wet contamination.

10% BTC 2125[®]M Powdered Fabric Softener/Sanitizer inhibits the growth of organisms which act on urine to produce ammonia in diapers and wet bed linens. It also softens clothes, thereby eliminating chafing and "static cling" from nylons and other synthetic fabrics. The use of this product will also help to improve ironing time.

ACCEPTED with COMMENTS in EPA Letter Dated:

JUL 2 9 2003

Under the Federal Insecticide,
Pungicide, and Rodenticide Act as
amended, for the trusticide,
registered under EPA Reg. No. 1839 - 100

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 and rubber gloves, and protective clothing. Harmful if swallowed or absorbed through skin. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

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 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 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

(OPTIONAL) You may contact xxx/xxx-xxxx for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

(Note: If container size is of 50 lbs. or greater, the following Environmental Hazards statement must be used.)

ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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.

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.

CONTAINER DISPOSAL - Do not reuse empty container. Triple rinse empty container with water. Offer empty metal or plastic containers for recycling if available. Return metal drums then offer for reconditioning or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and 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

For containers less than 50 lbs: Do not reuse empty container. Wrap in newspaper and discard in trash.

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 Gerial Structions, contact your State Pesticide or Environmental Control Agency with the rearest. EPA Regional Office for guidance. In EPA Regional Office for guidance.

Stepan Company

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Amend 4/29/03