

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JUL 16 2002

Subject: BTC 2125M Sanitizer Concentrated Powder
EPA Registration No. 1839-142
Application Date: 4/29/02
Receipt Date: 5/01/02

Dear Mr. Isaac:

The following amendment, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- Update First Aid Statements
- Update Precautionary Statements
- Expand Use Directions
- Addition of Use Directions for Tablets

CONDITIONS

Revise the label as follows:

1. On the Left Panel of the label, remove "Water Soluble Packet - Store in cool dry place. Do not handle packets with wet hands," to the Right Panel of the label, directly under "Pesticide Storage".
2. On the Left Panel of the label, remove "Tablets - Store in a cool dry place. Do not handle tablets with wet hands". Also place under "Pesticide Storage".

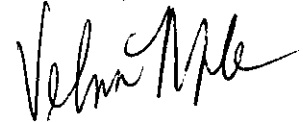
GENERAL COMMENTS

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

CONCURRENCES							
SYMBOL	MS 100						
SURNAME	T. Isaac						
DATE	7-16-02						

Should you have any questions or comments concerning this letter, please contact Zenobia Jones at (703) 308-6198.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble". The signature is written in a cursive style with a large initial "V" and a long, sweeping tail.

Velma Noble
Product Manager 31
Regulatory Management Branch 1
Antimicrobial Division (7510C)

BTC 2125[®]M-P40 SANITIZER CONCENTRATED POWDER

ACTIVE INGREDIENTS

Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈) dimethyl benzyl ammonium chlorides.....	20.00%
Alkyl (68% C ₁₂ , 32% C ₁₄) dimethyl ethylbenzyl ammonium chlorides.....	20.00%
INERT INGREDIENTS	<u>60.00%</u>
Total	100.00%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

See side panels for additional precautionary statements.

EPA REG. NO. 1839-142
EPA EST. NO. 1839-IL-01

STEPAN COMPANY
22 West Frontage Road • Northfield, IL 60093

NET CONTENTS: 0.0625 ounce per packet per tablet or
 0.125 ounce per packet per tablet or
 0.1875 ounce per packet per tablet or
 0.3125 ounce per packet per tablet or
 0.625 ounce per packet per tablet or
 1.25 ounce per packet per tablet

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JUL 16 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1839-142

(Center Panel)

Amend 04/29/02

DIRECTIONS FOR USE

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

BTC 2125M-P40 Sanitizer Concentrated Powder is designed specifically for use in restaurants, dairies, and bars where sanitization of food contact surfaces is of prime importance.

This product will sanitize previously cleaned and rinsed nonporous food contact surfaces such as tanks, counter tops, drinking glasses and eating utensils. When used at the recommended concentration of 200 ppm no potable water rinse is required.

When used as directed this product is an effective sanitizer against Escherichia coli and Staphylococcus aureus when diluted in water up to 750 ppm hardness (CaCO₃).

SANITIZATION - Remove all gross food particles and soil from areas which are to be sanitized with a good detergent, pre-flush, pre-soak or pre-scrape treatment. Rinse with a potable water rinse. To sanitize pre-cleaned and potable water-rinsed, non-porous, food contact surfaces, prepare a 200 ppm active quaternary solution by using the following dilution table:

In order to make X gallons of Solution	Add Net Weight of Product			
	in Ounces	or in Grams		
1	0.0625	1.8	or ONE Packet	or ONE Tablet
2	0.125	3.5	or ONE Packet	or ONE Tablet
3	0.1875	5.3	or ONE Packet	or ONE Tablet
5	0.3125	8.9	or ONE Packet	or ONE Tablet
10	0.625	17.7	or ONE Packet	or ONE Tablet
20	1.25	35.4	or ONE Packet	or ONE Tablet

To sanitize immobile items such as tanks, chopping blocks and counter tops, apply sufficient product by hand pump trigger sprayer, mop, sponge or cloth to flood the area with a 200 ppm active quaternary solution for at least 60 seconds making sure to wet all surfaces completely. Drain the use solution from the surface and air dry. Prepare a fresh solution daily or more frequently as soil is apparent.

To sanitize mobile items such as drinking glasses and eating utensils, immerse in a 200 ppm active quaternary solution for at least 60 seconds making sure to immerse completely. Remove, drain the use solution from the surface and air dry. Prepare a fresh solution daily or more frequently as soil is apparent.

When used for sanitization of previously cleaned food equipment or food contact items, limit the active quaternary to 200 ppm. **NO POTABLE WATER RINSE IS REQUIRED.** This product is an effective sanitizer when diluted in water up to 750 ppm hardness (CaCO₃).

To sanitize previously cleaned food-grade eggs in shell egg and egg product processing plants, spray with a solution of warm water at 200 ppm quat (see Dilution Table above). The solution should be warmer than the eggs, but not to exceed 130°F. Wet eggs thoroughly and allow to drain. Eggs sanitized with this product shall be subjected to a potable water rinse only if they are broken immediately for use in the manufacture of egg products. Eggs should be reasonably dry before casing or breaking. The solution should not be reused for sanitizing eggs.

PACKETS - *Tear open packet* - follow label dilution instructions and discard opened packet according to label disposal instructions.

Water soluble packet - follow label instructions by dropping packet directly into water. Do not remove packets before use. Store in a cool dry place. Do not handle packets with wet hands.

TABLETS - Follow label dilution instructions by dropping tablet directly into water. Do not remove tablets from container before use. Store in a cool dry place. Do not handle tablets with wet hands.

Stepan Company
Northfield, IL 60093
EPA Reg. No. 1839-142

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 16 2002

(Left Panel)

Amend 04/29/02

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1839-142

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, rubber gloves, and protective clothing. May be fatal if swallowed. 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 with plenty of water for 15-20 minutes. Call 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.

(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.

ENVIRONMENTAL HAZARDS

(Required for product supplied in containers 50 lbs. or greater.)

This pesticide 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. 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.

PACKET DISPOSAL - Do not reuse packet. Discard packet 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 to label instructions contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

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JUL 16 2002 (Right Panel)

Stepan Company
Northfield, IL 60093
EPA Reg. No. 1839-142

Amend 04/29/02

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
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Water Soluble Packet Label:

**BTC 2125[®]M-P40
SANITIZER CONCENTRATED
POWDER**

ACTIVE INGREDIENTS

Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈) dimethyl benzyl ammonium chlorides.....	20.0%
Alkyl (68% C ₁₂ , 32% C ₁₄) dimethyl ethylbenzyl ammonium chlorides.....	20.0%

INERT INGREDIENTS	60.0%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN

DANGER

See master label for additional precautionary statements
and use directions.

EPA REG. NO. 1839-142
EPA EST. NO. 1839-IL-01

STEPAN COMPANY
22 West Frontage Road • Northfield, IL 60093

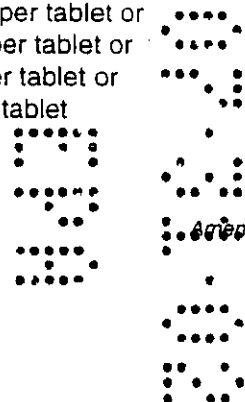
Add one packet to X gallons of water.

NET CONTENTS:	0.0625 ounce per packet per tablet or
	0.125 ounce per packet per tablet or
	0.1875 ounce per packet per tablet or
	0.3125 ounce per packet per tablet or
	0.625 ounce per packet per tablet or
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1839-142



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Tear Open Packet Label:

BTC 2125[®] M-P40 SANITIZER CONCENTRATED POWDER

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INERT INGREDIENTS	60.0%
Total	100.00%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

See master label for additional precautionary statements
and use directions.

ACCEPTED

Disposal - Do not reuse empty packet. Wrap packet and put in trash.

EPA REG. NO. 1839-142
EPA EST. NO. 1839-IL-01

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Mix contents of one packet into X gallons of water.

NET CONTENTS:

0.0625 ounce per packet per tablet or	
0.125 ounce per packet per tablet or	
0.1875 ounce per packet per tablet or	
0.3125 ounce per packet per tablet or	
0.625 ounce per packet per tablet or	
1.25 ounce per packet per tablet	

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