

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 5 1992

Mr. John Vinters  
John Sexton & Company  
1800 Churchman Avenue  
Indianapolis, IN 46203

Dear Mr. Vinters:

Subject: Sexton Pine Oil Disinfectant  
EPA Registration No. 1947-7  
Your Amendment Dated May 20, 1992

This is in response to your amendment to revise the label reflecting removal of soap from the active ingredients for the subject product per Agency's request. The following comments apply.

1. The removal of soap from the active ingredients and placing it with inert ingredients is in compliance with current EPA Label Improvement Program and is acceptable.
2. The revised Confidential Statement of Formula is not filled out completely and is not acceptable.
3. Submit a revised Confidential Statement of Formula and in blocks 14a and 14b enter the upper and lower certified limits for all components including Tall oil fatty acids and Potassium hydroxide.
4. In the revised label in the ingredient statement change "Inactive Ingredients" to "Inert Ingredients".

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- 5. The container disposal instructions should be grouped under the heading "Container Disposal". The instructions should be given for the disposal of pesticide, for guidance refer to PR Notice 83-3. These instructions should be placed under the headings Storage and Disposal, and should be similar to:

"Do not contaminate water food, or feed by storage or disposal. "Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility".

If you have any questions about these comments, please call Marianne Clark at 703-305-7879.

Sincerely yours,



Ruth Douglas  
 Product Manager (32)  
 Antimicrobial Program Branch  
 Registration Division (H7505C)

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