

MAY 24 1988

Elkhorn Chemical Company, Inc.
One Elko
P.O. Box 209
Elkhorn, WI 53121

Attention: Delores A. Stehle

Gentlemen:

Subject: General Purpose Sanitizer
EPA Registration No. 2437-17
Your Submission Dated March 11, 1988

The submission referred to above, submitted in connection with the Label Improvement Program Notice for Antimicrobial Products Used as Food Contact Surface Sanitizers, is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling.
 - a. Include a 10-minute contact time for the disinfection section.
 - b. Delete the statement "No potable water rinse is required" from the sanitization section.
 - c. The contact time of at least 1 minute is required for sanitization.
 - d. Revise your disposal statement to read:

STORAGE AND DISPOSAL

PROHIBITIONS

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

54748;I;Lee:L-1;KENCO:5/17/89;5/18/89;KA;GJ;VO

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

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

(for metal containers)

Triple rinse (or Equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

(for plastic containers)

Triple rinse (or Equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities, by burning. If burned, stay out of smoke.

The "STORAGE AND DISPOSAL" heading must be of the same type size as the child hazard warning statement.

- e. On the right panel, the "First Aid" heading must be changed to "Statement of Practical Treatment."
- f. Delete the word "milk."
- g. Revise the referral statement to read:

See right side panel for additional precautionary statements.

- h. Revise the "Directions" heading to read:

Directions For Use

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

- i. Revise the statement "For heavily soiled or contaminated areas precleaning is recommended" to read:

For heavily soiled or contaminated areas, a precleaning step is required.

- j. Include the following headings on the right panel immediately above the word "DANGER:"

**Precautionary Statements
Hazards to Humans and Domestic Animals**

- k. The signal word "DANGER" must be placed directly below the statement "Keep Out of Reach of Children" (front panel only).

- 2. We have determined that this product is subject to the child-resistant packaging regulations (effective March 9, 1981).

Two suggestions for compliance are:

- a. Submit a special packaging certification statement. Specifically refer to page 388, "Contents of Certification." Ref: Federal Register Vol. 49, No. 2, Wednesday, January 4, 1984 pp. 380-388.

and/or

- b. Delete all references to household/home use.

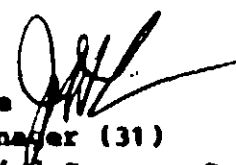
- 3. The revised Confidential Statement of Formula agrees with the label and is acceptable.
- 4. Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of the Federal Insecticide, Fungicide, and Rodenticide Act. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha DeLaney at (703) 557-6982.

Sincerely yours,


 John H. Lee
 Product Manager (31)
 Antimicrobial Program Branch
 Registration Division (H7505C)

Enclosure

**DISINFECTANT-DEODORIZER-SANITIZER
DIRECTIONS**

FOR SANITIZING AND DISINFECTING FLOORS, WALLS, AND UNANIMATE HARD SURFACES IN HOMES, SCHOOLS, HOSPITALS AND OFFICES. USE IN LOCKER ROOMS, CORRIDORS, CLASSROOMS, SINK TOPS, GARBAGE PAILS, ETC., APPLYING SOLUTION WITH MOP OR CLOTH. SANITIZE WITH SOLUTION OF ONE OUNCE OF GENERAL PURPOSE SANITIZER TO FOUR GALLONS OF WATER. DISINFECT WITH THREE OUNCES OF GENERAL PURPOSE SANITIZER TO FIVE GALLONS OF WATER. FOR HEAVILY SOILED OR CONTAMINATED AREAS PRE-CLEANING IS RECOMMENDED.

HOSPITALS AND WORKING HOMES: FOR USE ON ALL HARD SURFACES. USE SOLUTION OF THREE AND ONE-HALF OUNCES OF GENERAL PURPOSE SANITIZER TO FIVE GALLONS OF WATER. AT THIS LEVEL, GENERAL PURPOSE SANITIZER WILL BE EFFECTIVE AGAINST PSEUDOMONAS AERUAINOSA PRO-10, STAPHYLOCOCCUS AUREUS, AND SALMONELLA CHOLERAESUS.

FOOD PROCESSING EQUIPMENT: FOR SANITIZING PREVIOUSLY CLEANED FOOD PROCESSING EQUIPMENT. DILUTE ONE OUNCE GENERAL PURPOSE SANITIZER WITH FOUR GALLONS OF WATER. AT THIS LEVEL, NO POTABLE WATER RINSE IS REQUIRED.

RESTAURANTS AND BAR RINSE: FOR DISHES, GLASSWARE, SILVERWARE, AND COOKING UTENSILS.

- 1- SCRAPE AND BRUSH UTENSILS AND GLASSES WHEREVER POSSIBLE.
- 2- WASH GLASSES, DISHES, UTENSILS, FOOD AND DAIRY EQUIPMENT ETC., WITH SOAP WASHWATER OR FLUID SOAP.
- 3- RINSE WITH CLEAN WATER.
- 4- SANITIZE IN A SOLUTION OF ONE OUNCE TO FIVE GALLONS OF WATER (200ppm) WHERE APPROPRIATE FOR AT LEAST TWO MINUTES OR FOR CONTACT TIME SPECIFIED BY THE CORRESPONDING SANITARY CODE.
- 5- PLACE SANITIZED UTENSILS ON A RACK OR DRAINBOARD TO AIR DRY. DO NOT Wipe Glassware or Utensils.



ACTIVE INGREDIENTS:

n-Allyl (583014, 303015, 52012, 52018)5%
dimethyl benzyl ammonium chlorides.....	5%
n-Allyl (583012, 52014)5%
ethylbenzyl ammonium chlorides.....	5%
INERT INGREDIENTS.....	80%
	100%

DANGER
KEEP OUT OF REACH OF CHILDREN
SEE FRONT SIDE OF PANEL FOR FIRST AID AND
ADDITIONAL PRECAUTIONS



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