

JUN 15 1994

The Fuller Brush Company
 P.O. Box 729
 One Fuller Way
 Great Bend, KS 67530

Attention: Bill Dayton,
 Chief Chemist

Subject: Fullsan
 EPA Registration No. 2915-55
 Your Amendment Dated December 17, 1993

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to revise the labeling Signal Word (Danger) and Precautionary Statements based on cited Toxicity Category I data, has been reviewed by the Agency and found to be acceptable, provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. On the front panel, after the signal word "DANGER:", change the referral statement to read "See back panel for additional Precautionary Statements."

b. On the side panel, in the paragraph above the "DIRECTIONS FOR USE:" heading, please amend the statement: "Recommended specifically for use in and on lavatories,..." to read "Recommended specifically for use in and on toilet bowls, urinals, lavatories,..." in order to remain consistent with provided use directions.

c. For item number 2. under the use directions "FOR CLEANING, DISINFECTING AND DEODORIZING TOILET BOWLS AND URINALS:", change the word "sacle" to read "scale".

d. As requested previously in an EPA letter dated August 21, 1992, delete the sentence "A preliminary cleaning for heavily soiled surfaces will be necessary." from the use directions for "CLEANING AND DISINFECTING LAVATORIES, SHOWERS, BATHTUBS, FLOOR AND OTHER WATER WASHABLE HARD NON-POROUS SURFACES."

SYMBOL	7525C						
SURNAME	D. Ariado						
DATE	6/8/94						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2043

e. Under "PRECAUTIONARY STATEMENTS", revise the "Statement of Practical Treatment" section to include the following:

- If swallowed, drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol. Call a physician.
- Note To Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

f. An Environmental Hazards statement is not required for your product as per EPA PR Notice 93-10. Please delete this statement from the label.

g. Per FIFRA § 156.10 labeling requirements, Storage and Disposal statements must precede or directly follow the Directions for Use Section. Therefore move the "STORAGE AND DISPOSAL" block after the HIV-1 Instructions and before the "PRECAUTIONARY STATEMENTS" block.

2. Submit five (5) copies of the revised final printed labeling before you release the product for shipment.

Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the product label is enclosed for your records.

Please note for your records that your submission of December 17, 1993 erroneously states that "Category III skin and eye irritation" data exists for your product when in fact our files indicate Category I eye irritation data and Category II skin irritation data for BTC 2125 M. It is the existence of the Category I data that requires assigning the signal word "DANGER" to your product label.

If you have any questions concerning this letter, please contact Doreen Aviado at (703) 305-6554.

Sincerely,



Marshall Swindell
Acting Product Manager-31
Antimicrobial Program Branch
Registration Division (7505C)

CONCURRENCES

SYMBOL	Enclosure						
SURNAME	D. AVIADO						
DATE	6/8/94						

FULLSAN

FULLSAN is a low sudsing cleaner that kills a wide range of Gram-positive and Gram-negative bacteria and fungi at a 1:64 dilution. FULLSAN contains a blend of "quat" type germicides and a biodegradable detergent that disinfects hard, non-porous surfaces contaminated by bacteria.

Designed for use by hospitals, schools, institutions, public facilities and households. Cleans and disinfects hard, non-porous surfaces such as floors, walls, table tops, bed frames, tubs, tile surfaces, basins and telephones. Use FULLSAN wherever the control of infectious bacteria is essential to the environment. FULLSAN is a pleasantly fragranced cleaner, disinfectant and deodorizer recommended for bathrooms and showers and any other hard, non-porous surface found in schools, hotels, motels, office buildings, restaurants, locker rooms, commercial and institutional buildings, and the home. Recommended specifically for use in and on lavatories, glazed ceramic tile and fiberglass showers, bathtubs, hard surface floor and other water washable surfaces. May be used daily as a multi-purpose cleaner, disinfectant, or deodorizer. FULLSAN is virucidal against HIV-1 (AIDS virus), Influenza A2/Hong Kong, Canine parvovirus, and Herpes Simplex Type 1 according to the virucidal qualification modified in the presence of 5% serum at 1:64 dilution (2 ounces per gallon of water).

Authorized by USDA for use in federally inspected meat and poultry plants.

DIRECTIONS FOR USE:

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

For Disinfecting: Apply solution of two ounces FULLSAN to one gallon of water (1:64). Pre-clean with a separate 1:64 solution of FULLSAN, giving special attention to thorough cleaning, using a sponge, mop or spray to thoroughly wet surfaces. Allow surface to remain wet for 10 minutes. Rinse thoroughly with clean, potable water. When Pseudomonocidal product is required, use 3 oz. per gallon.

To disinfect against the spread of athlete's foot fungi (trichophyton mentagrophytes) in areas commonly contacted by bare feet (showers, locker rooms, pools), apply freely a 1:64 solution of FULLSAN by sponge, mop or spray to wet all surfaces thoroughly. Allow surface to remain wet for 10 minutes. Rinse thoroughly with clean, potable water.

For Light Cleaning: Apply solution of one ounce FULLSAN to one gallon of water (1:128) to all surfaces listed above.

FOR CLEANING, DISINFECTING AND DEODORIZING TOILET BOWLS AND URINALS:

1. Thoroughly clean all surfaces prior to applying FULLSAN.
2. For excessive soil, rust or hard water scale deposits, a preliminary cleaning is required.
3. Direct 1.5 fl. oz. of FULLSAN to the sides and under the bowl rim or surface to be disinfected.
4. Scrub all interior surfaces including under the bowl rim with bowl brush or swab.
5. Allow surface to remain wet at least 10 minutes.
6. Rinse toilet or urinal by flushing and rinse out swab or brush.

CLEANING AND DISINFECTING LAVATORIES, SHOWERS, BATHTUBS, FLOOR AND OTHER WATER WASHABLE HARD NON-POROUS SURFACES.

1. Thoroughly clean all surfaces prior to applying FULLSAN.
2. Dilute 2 oz. of Fullsan per gallon of water.
3. Apply with cloth, sponge, sprayer, brush or mop.
4. Allow treated surface to remain wet for at least 10 minutes with solution.
5. Rinse thoroughly with water. For midwestatic performance allow product to dry without rinsing. A preliminary cleaning for heavily soiled surfaces will be necessary.



FULLSAN

Quaternary Germicidal Cleaner

AOAC Use-Dilution Test:

Kills Staphylococcus aureus.....	at 1 to 64
Kills Salmonella choleraesuis.....	at 1 to 64
Kills Pseudomonas aeruginosa.....	at 1 to 40

AOAC Fungicidal Test:

Kills Trichophyton mentagrophytes.....	at 1 to 64
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Virucidal Efficacy Test:

Herpes Simplex Type 1.....	at 1 to 64
Canine Parvovirus.....	at 1 to 64
HIV-1 (AIDS Virus).....	at 1 to 64
Human Influenza A2/Hong Kong.....	at 1 to 64

KEEP OUT OF REACH OF CHILDREN.

DANGER: See back panel for additional warnings and Statement of Practical Treatment.

ACTIVE INGREDIENTS	% By Weight
n-Alkyl (60% C14, 30% C16, 5% C12, 5% C18)	
dimethyl benzyl ammonium chlorides.....	1.6%
n-Alkyl (68% C12, 32% C14) dimethyl ethylbenzyl ammonium chlorides.....	1.6%
INERT INGREDIENTS.....	96.8%
TOTAL.....	100.0%

EPA Reg. No. 2-15-55

EPA Est. No. 62511-KS-1

Product Number:

Net Contents:

Lot No.:

FULLER BRUSH COMMERCIAL PRODUCTS
GREAT BEND, KS 67530 • 316-792-1711

MADE IN U.S.A.

984-1093E

KILLS HIV ON PRE-CLEANED PREVIOUSLY SOILED WITH BLOOD settings in which there is an expected with blood or body fluids, and in which body fluids can be associated with immunodeficiency virus Type 1 (HIV-1).

SPECIAL INSTRUCTION FOR CLEANING 1 (AIDS VIRUS) OF SURFACES/OBJECTS

Personal Protection: Disposable lab coverings as appropriate must be worn during decontamination procedures.

Cleaning Procedures: Blood and surfaces and objects before application.

Contact Time: Allow surfaces to remain wet for 10 minutes.

Disposal of Infectious Materials: Blood and disposed of according to local, state, and disposal.

KEEP OUT OF REACH OF CHILDREN.

PRECAUTIONS

HAZARD TO HUMANS

DANGER: CORROSIVE, causes eye irritation on skin or clothing. Wear goggles or eye protection. Harmful or fatal if swallowed. Avoid contact with skin and eyes.

STATEMENT OF PRACTICAL TREATMENT

In case of contact, immediately flush with water for 15 minutes. For eyes, call a physician. For ingestion, call a physician. Do not induce vomiting. Do not administer any food or drink.

ENVIRONMENTAL

Do not discharge effluent containing this product into oceans or other waters unless in accordance with Pollution Discharge Elimination System (PDES) permit. This product has been notified in writing prior to discharge into sewer systems without pre-approval. For guidance contact your local health authority. For guidance contact your local health authority.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed. STORAGE: Store in a dry place not exceeding 120°F. Keep from freezing.

CONTAINER DISPOSAL: Do not reuse. Then offer for recycling or reconditioning, landfill, or any other procedures approved by local authorities, by burning. If burned stay away from water. PESTICIDE DISPOSAL: Pesticide wastes of excess pesticide, spray mixture, wastes cannot be disposed of by usual household waste disposal. State Pesticide Representative at the local health authority.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed. STORAGE: Store upright in original container, inaccessible to children or persons under 18. PESTICIDE DISPOSAL: Securely wrap in newspaper and discard in trash. CONTAINER DISPOSAL: Do not discard in trash.

BEST AVAILABLE COPY

ACCEPTED
with COMMENTS
in EPA Letter Dated
JUL 1 1980

Under the Federal Insecticide, Fungicide, and Rodenticide Act, the following information is provided for the pesticide registered under FIFRA No. 2915-55