

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Ms. Kim Inman
Regulatory Chemist
ABC Compounding Co., Inc.
P.O. Box 16247
Atlanta, GA 30321

FEB 11 2004

SUBJECT: Rough & Ready
EPA Registration Number: 3862-86
Application Dated: October 22, 2003
Receipt Date: November 14, 2003

Dear Ms. Inman:

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

Conditions

1. Revise the directions for use on toilet bowls as follows. Revise to state: "...Use 4 ounces in toilet bowls..." deleting the term concentrate as this is a ready to use solution which is not diluted.
2. Revise the directions for sanitizing non-food contact surfaces. Revise to state: "Use on washable, hard, nonporous surfaces: walls, floors, tables *without dilution*..." deleting "undiluted use concentrate" as these descriptors do not apply to this type of product.

A stamped copy of the accepted labeling is enclosed. Submit one (1) copy 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 Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510C)

7510C.T.Lantz.2/11/04.3862-86a

CONCURRENCES

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|---------|----------|--|--|--|--|--|--|--|
| SYMBOL | 7510C | | | | | | | |
| SURNAME | T. Lantz | | | | | | | |
| DATE | 2/11/04 | | | | | | | |

ACCEPTED
with COMMENTS
in EPA Letter Dated:

FEB 11 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this product is registered under EPA Reg. No. 3862-86

PMS 327 (TURQUOISE)
LA-479 (gallon screen) (5-4-00 changed icon per EPA)

★ epa update 05-24-03 stan
Revised on 10-21-03 Cynthia



Manufactured by:
A.B.C. COMPOUNDING CO, INC.
Atlanta, GA 30321

EPA Establishment No. 3862-GA-1
EPA Registration No. 3862-86-

ACTIVE INGREDIENTS

n-Alkyl (C14 50%, C16 30%, C12 5%,
C18 5%) dimethyl benzyl ammonium
chlorides..... 0.09%

n-Alkyl (C12 50%, C14 30%, C16 17%,
C18 3%) dimethyl ethylbenzyl
ammonium chlorides..... 0.09%

INERT INGREDIENTS..... 99.82%
TOTAL..... 100.00%

Rough & Ready
Ready To Use Germicide Cleaner
Disinfectant - Deodorant
Desodorante y desinfectante germicida

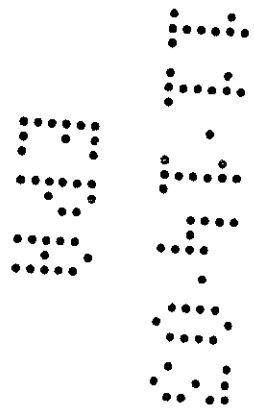
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand this label, find someone to explain it to you in detail.)

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements.

Net Contents: 1 gallon (3.8 L)



Not only helps control the hazard of cross-contamination from treated surfaces on hard nonporous, environmental surfaces but also kills many microorganisms that cause odors. Recommended for disinfecting hard nonporous inanimate surfaces. For use in schools, colleges and office buildings. Kills Streptococcus pyogenes, Salmonella choleraesuis, Pseudomonas aeruginosa, Staphylococcus aureus and Trichophyton mentagrophytes (Athlete's Foot Fungus). Virucidal against influenza Type A/Michigan, Herpes Simplex Type 2, and *HIV-1 (AIDS virus).

DIRECTIONS FOR USE

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

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

FOR DISINFECTING For disinfecting, remove gross food particles and heavy soil deposits, then apply this product to walls, floors, garbage cans, and other hard (inanimate), nonporous surfaces, such as tables, chairs, countertops, sinks, bathroom fixtures, bedframes and showers with a coarse spray device so as to thoroughly wet surfaces for a contact time of 10 minutes. On surfaces which contact food, follow with a potable water rinse. This product is not for use on dishes, glassware or eating utensils. Let air dry or wipe dry. *Kills HIV-1 (AIDS virus) on pre-cleaned environmental surfaces/objects previously soiled with blood/body fluids in healthcare settings or other settings where there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of human immunodeficiency virus Type 1 (HIV-1) (associated with AIDS). **SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 (AIDS VIRUS) OF SURFACES/OBJECTS SOILED WITH BLOOD/BODY FLUIDS.** **Personal Protection:** Disposable latex or vinyl gloves, gowns, face masks, or eye coverings as appropriate, must be worn during all cleaning of body fluids, blood, and decontamination procedures. **Cleaning Procedures:** Blood and body fluids must be thoroughly cleaned from surfaces and objects before application of disinfectant. **Contact Time:** Effective against HIV-1(AIDS virus) on hard non-porous surfaces in the presence of a moderate amount of organic soil(5% blood serum)(providing 800 ppm of active quaternary) for a contact time of 5 minutes at room temperature (20-25°C). Use a ten(10) minute contact time for disinfection against all other bacteria, fungi, and viruses claimed (listed above). **Disposal of Infectious Materials:** Blood and other body fluids should be autoclaved and disposed of according to federal, state, and local regulations for infectious waste disposal. **KITCHEN** Kitchen floors collect both traffic dirt and germs. Use this product anywhere greasy dirt is a problem.

DIRECTIONS FOR USE (continued):

BATHROOM Great for cleaning and deodorizing basins, tubs, and tiles. Leaves everything bright and clean...kills odor-causing germs. Use this product where odors are a problem. **TO CLEAN AND DISINFECT TOILET BOWLS** Remove or expel over the inner trap residual bowl water prior to applying solution. Remove gross filth. Use 4 ounces of concentrate in toilet bowl. Squeeze around bowl and under water rim. Then scrub thoroughly with brush making sure to get under the rim and let stand for at least 10 minutes, then flush. This product, when used as directed, will not harm white or colored bowls or inanimate, hard surfaces. Close cap on container after use. **SANITIZING NON-FOOD CONTACT SURFACES** Use on washable, hard, nonporous surfaces: walls, floors, tables at an undiluted use concentration. The product is effective against Staphylococcus aureus and Enterobacter aerogenes in the presence of 5% serum for specified hard, non-porous surfaces. Apply by mop, sponge, cloth or spray to thoroughly wet surfaces for a minimum contact time of 5 minutes. Wipe dry with a clean cloth or sponge, or allow to air dry. **MILDEWSTATIC INSTRUCTIONS** This formulation will effectively inhibit the growth of mold and mildew plus the odors caused by them when applied to hard, nonporous surfaces such as walls, floors, and table tops. Apply solution by spraying the product, making sure to wet all surfaces completely. Let air dry. Repeat application weekly or when growth reappears.

PRECAUTIONARY STATEMENTS

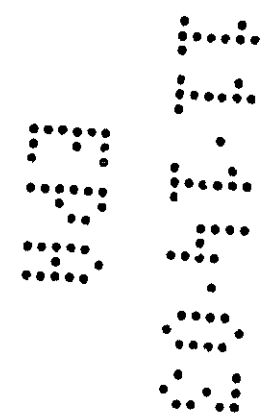
Hazards to Humans and Domestic Animals.

CAUTION: Harmful if absorbed through the skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

| FIRST AID | |
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| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. | |
| If on skin or clothing | <ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice. |
| If in eyes | <ul style="list-style-type: none"> 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 swallowed | <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> 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. |

ENVIRONMENTAL HAZARDS 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 |
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| Do not contaminate water, food, or feed by storage or disposal. PESTICIDE STORAGE: Store in original container in areas inaccessible to children. Do not store on side. Avoid creasing or impacting of side walls. Open dumping is prohibited. Do not reuse empty container. PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. CONTAINER DISPOSAL: Triple rinse (or equivalent) Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. |



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