UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 2 7 2002

Linda Kirk Campbell Director of Regulatory Compliance Carroll Company 2900 West Kingsley Road Garland, TX 75041

Subject:

Amendment per FIFRA

Self-Sanitizing Flow Flex Floor Finish

EPA Registration No. 4313-37 Application Date: March 11, 2002 EPA Received Date: March 29, 2002

Dear Ms. Campbell:

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

Proposed Amendment

Update First Aid Statements per PR Notice 2001-1

Label Comments

- 1. Delete the "Self-Sanitizing" claim. Per Agency letter, dated April 12, 1993, this claim is not acceptable. The proposed protocol is not acceptable because it does not meet the criteria specified in the EPA product performance guidelines for the determination of the residual self-sanitizing activity of dried chemical residues on hard, inanimate surfaces. You must submit data to make this claim.
- Delete the phrase "Tests on floors treated as directed show a reduction of odor causing bacteria levels of 99.999% in environments having greater than 50% relative humidity." This is a sanitizing (public health) claim and you must submit

data to support this claim.							
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- 3. Delete the phrase "Avoid contamination of foods." from the label.
- 4. Place the phrase "Keep from freezing." with the Storage and Disposal Statements.
- 5. The "Note to Physician" under the First Aid Statements should be deleted. It is not required for this product.
- 6. Since this product is sold in 1 gallon containers, you must revise your storage and disposal instructions accordingly:

Storage and Disposal

Store in original container in areas inaccessible to children and persons unfamiliar with its proper use. Keep from freezing. Do not reuse container. Wrap container and discard in the trash.

7. Revise the Precautionary Statements to read: CAUTION. Keep out of Reach of Children. Harmful if absorbed through the skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

General Comments

A stamped copy of the label is enclosed for your records. Please submit one(1) final printed label before releasing this product shipment. Should you have any questions regarding this letter, please contact me at 703-308-6233.

Sincerely,

Velma Noble

Product Manager 31

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Regulatory Management Branch I

Antimicrobials Division (7510 C)

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WHA COMMENTS IN EPA Letter Dated:

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This copolymer finish is designed for use in hospitals, laboratories, nursing homes, institutions, commercial buildings, and households. It contains a chemical ingredient which provides residual bacteriostatic activity against odor-causing

Damp mopping activates the bacteriostatic qualities of the floor finish. Tests on floors treated as directed show a reduction of odor-causing bacteria levels of 99,999% in environments having greater than 50% relative humidity.

Its long-lasting shine is remarkably resistant to rubber marking and scuffing. One gallon will cover 2000 to 2500 square feet

Wet floors may be slippery floors. Clean up all spills right away.

FAILURE TO FLOOW ALL INSTRUCTIONS AND PRECAUTIONS COULD LEAD TO SLIPPERY CONDITIONS.

Directions for Use

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

Clean floors thoroughly, rinse and allow to dry before applying first coat of copolymer floor finish.

Use clean applicator. Apply the finish in a thin, uniform coat and allow to dry. A second coat will give an even deeper gloss. To avoid contamination, do not return unused finish to original container.

Sweep or dry mop each day to remove surface dirt. Damp mop with water or dilute solution of neutral cleaner to remove accumulated soil. Buff to brighten.

Avoid contamination of foods Keep from freezing

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EPA Est. 4313-TX-1

EPA Reg. No. 4313-37

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal.

Storage: Keep container closed when not in use.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposat: Plastic Containers-Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If by burning, stay out of smoke.

Precautionary Statements

HAZARD TO HUMANS AND DOMESTIC ANIMALS

Harmful if absorbed through skin. Avoid contact with skin, eyes, and clothing.

FIRST AID

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. IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes.

Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.











 Garland, Texas 75041 527.5722 • www.carrolica.com

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Under the Federal Insecticide, Fundicide, and Exclusive Act as amended, for the possibilities, and as a segistered under EFA Reg. No. 43/3-37

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