UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR - 5 2003

Cristina Griffin, Agent for De Vere De Vere Chemical Company, Inc. c/o Delta Analytical Corp. 7910 Woodmont Ave. Suite 1000 Bethesda, MD 20814

SUBJECT:

Sani Kleen II

EPA Registration Number: 5174-22 Application Date: December 3, 2002 Receipt Date: December 9, 2002

Dear Ms. Cristina Griffin:

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:

- Update Confidential Statement of Formula
- Update First Aid Statements
- Update Precautionary Statements
- Update Storage and Disposal Statements

Conditions

1. Based on the fact that this product is for use in day care centers, which as classified as residential use according to 40 CFR part 157.21(e) and this product is Toxicity Category I for Primary Eye and Primary Skin, Child Resistant Packaging is required as per 40 CFR parts 157.20 through 157.36.

Submit the required certification as per 40 CFR part 157.34 within 60 days of the date of this letter.

2. Revise the "Deodorization" directions by deleting the phrase: "and/or animals." This phrase is unnecessary as the directions for treatment of kennel areas is addressed separately.

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3. Your Application for Pesticide indicates that this product is marketed in various sizes including 6 gallon containers. Thus according to PR Notices 93-10 and 95-1 the following statements are required when this product is marketed in containers of 5 gallons or more:

"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."

General Comments

The submitted Confidential Statement of Formula dated 12/3/02 is acceptable and will be made part of the record for this file.

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 concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C)

Enclosure: Stamped Label 7510C:T.Lantz:3/4/03:5174-22a

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DE VERE SANI KLEEN II

[choose from the following use sites consistent with directions for use on the label:]
For use in schools, day care centers, restaurants, cafeterias, convenience stores, kennels, restrooms, hospitals, nursing homes

Active Ingredient:	
n-Alkyl (50% C ₁₄ , 40% C ₁₂ , 10% C ₁₆) dimethyl benzyl ammonium chlorides	5.0 %
Other Ingredients	<u>95.0 %</u>
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN DANGER

	FIRST AID ntrol Center or doctor immediately for treatment advice. Have the product container or when calling a poison control center or doctor, or going for treatment.
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.
If Swallowed	 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.

SEE SIDE [BACK] PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 5174-22

EPA Est. No. 5174-WI-1

NET CONTENTS:

[for packets add: See insert for directions for use. Or alternatively 666756 outer box with COMMENTS in EPA Letter Dated:

MAR 5 2003

Manufactured by:

DE VERE CHEMICAL CO., INCUnder the Federal Insecticide,
1923 BELOIT AVENUE
Functionide, and Rodenticide Act as amended, for the pesticide,
JANESVILLE, WISCONSIN 5354 egistered under EPA Reg. No.

[Bracketed sections are informational only and not part of labeling]

with COMMENTS in EPA Letter Dated:

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DE VERE SANI KLEEN II DIRECTIONS FOR USE

Under the Federal Insecticide. It is a violation of Federal Law to use this product in a manner inconsistent with itside Act as amended, for the posticide. labeling. registered under EPA Reg. No. 5/74-22

The following paragraph must be used in the directions for use on the label] This product is for use on stainless steel, chrome, formica, vinyl, hard plastic, and other hard non-porous surfaces. Do not reuse used solution. Surfaces that will contact food must be rinsed with potable water. Not for use as a disinfectant or sanitizer on dishes, glassware, or eating utensils.

The following sentence must be added to the above paragraph only if the hospital directions below are used, or if hospitals or nursing homes are listed anywhere on the label:] Not for use on medical devices or medical equipment surfaces.

[Use one or more of the following sets of directions; may appear in any order.]

GENERAL PURPOSE DISINFECTION - To disinfect walls, floors and other hard, non-porous surfaces in schools, restaurants, restrooms and other public areas, mop, sponge or spray with a fresh solution containing 1 fl. oz. of SANI KLEEN II per 1 gallon of water so as to maintain thoroughly wetted surface for 10 minutes. After 10 minute contact time, let air dry or rinse surface with clean water. All soiled surfaces must be pre-cleaned prior to disinfection (follow directions for cleaning).

To disinfect hard, non-porous surfaces in locker rooms, shower stalls, walkways around pools and other areas against pathogenic fungi, mop, sponge or spray with a fresh solution containing 3/4 fl. oz. of SANI KLEEN II per gallon of water so as to maintain thoroughly wetted surface for 10 minutes. After 10 minute contact time, let air dry or rinse surface with clean water. This solution will kill Trichophyton interdigitale, a causative agent of athletes foot. All soiled surfaces must be pre-cleaned prior to disinfection (follow directions for cleaning).

To disinfect toilet bowls, remove gross filth or heavy soil. Flush toilet then force the bowl water over the trap. Add directly to bowl water 2 fl. oz. of SANI KLEEN II. Swab or scrub all surfaces thoroughly including under the rim, and allow to remain wet for at least 10 minutes before flushing toilet.

HOSPITAL DISINFECTION - To disinfect walls, floors, furniture and other hard nonporous surfaces in hospitals and nursing homes, mop or sponge or spray with a fresh solution containing 2 fl. oz. of SANI KLEEN II per gallon of water so as to maintain thoroughly wetted surface for 10 minutes. After 10 minute contact time, let air dry or rinse surface with clean water. All soiled surfaces must be pre-cleaned prior to disinfection (follow directions for cleaning). Those surfaces that are heavily soiled with blood, fecal material or exudates should be thoroughly scrubbed with a solution containing 2 fl. oz. of SANI KLEEN II per gallon of water, and then rinsed with a fresh solution containing 2 fl. oz. of SANI KLEEN II per gallon of water before disinfection.

DEODORIZATION - Prior to deodorization of hard non-porous non-food contact surfaces including bathroom areas, garbage pails, diaper pails, food storage areas, and other areas where obnoxious odors may develop, remove all garbage, refuse, food and/or animals. Pre-clean surfaces using pressurized water where possible before deodorization. To deodorize, mop, sponge, or spray surfaces thoroughly with a solution containing 2 fl. oz. of SANI KLEEN II per gallon of water. Let air dry or rinse surface with clean water.

Deodorizing kennel areas: To deodoroize the following hard, non-porous surfaces: equipment not used for animal food or water, utensils, instruments, cages, kennels, stables, cateries, and other hard non-porous non-food contact surfaces. Remove all animals and feeds from premises, animal transportation vehicles, crates, etc. Remove all litter, droppings and manure from floors, walls and surfaces occupied or transversed by animals. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with a solution of 2 ounces of Sani Kleen II per gallon of water. Allow to air dry. Do not house animals or employ equipment until treatment has been absorbed, set, or dried.

[The mold/mildew directions are not to be used on labels of product containers with net contents of less than 2 ½ fl. oz.]

MOLD AND MILDEW CONTROL - To control mold and mildew on previously cleaned walls, floors, shower stalls and other hard, non-porous surfaces, mop, sponge, or spray with a fresh solution containing 2 ½ fl. oz. of SANI KLEEN II per gallon of water so as to thoroughly wet all surfaces. Allow to dry on surface. Repeat application weekly or when growth is visible.

SANITIZATION - To sanitize walls, floors and other hard non-porous, non-food contact surfaces, mop, sponge, or spray with a solution containing ¼ fl. oz. of SANI KLEEN II per gallon of water so as to maintain thoroughly wetted surface for 5 minutes. After 5 minute contact time, let air dry or rinse surface with clean water. All soiled surfaces must be pre -cleaned prior to sanitization (follow directions for cleaning).

FOR CLEANING LIGHTLY SOILED AREAS - Surfaces to be cleaned should be mopped or brushed with a solution containing 1 fl. oz. of SANI KLEEN II per gallon of water. Rinse cleaned area with fresh water.

[The following directions are not to be used on labels of product containers with net contents of less than 3 fl. oz.]

FOR CLEANING HEAVILY SOILED AREAS - Mop or brush soiled surface with a solution containing 2 to 3 fl. oz. of SANI KLEEN II per gallouvole water. Rinse cleaned area with fresh water.

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Fungicide, and Rodenticide Act as
amended, for the pericide,
registered under EPA Reg. No 5/74-22

12/3/02

STORAGE AND DISPOSAL

[for containers less than or equal to one gallon use the following on the label:] Store in original container in a locked storage area inaccessible to children. Do not reuse empty container. Discard in the trash.

[For containers greater than one gallon use the following on the label:] Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place. Store in original container in a locked storage area inaccessible to children.

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: Do not reuse empty container. 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.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Danger: Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or faceshield, protective clothing, and rubber gloves when handling this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ONLY FOR SALE TO, USE, AND STORAGE BY SERVICE PERSONS.

with COMMENTS in EPA Letter Dated:

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Functions, and Rodonticide Act as
amended, for the periodide,
regulered under EPA Reg. No. 5/74-22