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FEB 2 1987

Brogdex Company
1441 West Second Street
Pomona, CA 91766

Attention: John R. Bice

Gentlemen:

Subject: Cleansan 537
EPA Registration No. 5202-16
Your Submission Dated August 18, 1986

The amendment 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. On the front panel state the major areas for use in which the product is recommended (e.g., processing plants, restaurants, households, etc.).

b. On the left panel, under the heading USE DIRECTIONS, add the following misuse statement:

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

c. On the left panel, under the heading Sanitization, the first sentence should read as follows:

To sanitize nonfood contact hard surfaces such as floors, walls, and equipment in

22173: Lee: L-14: KENCO: 1/28/87: 2/9/87: LIZ: VO

		CONCURRENCES							
SYMBOL	▶								
SURNAME	▶								
DATE	▶								

EPA Form 1320-1 (4-81)

OFFICIAL FILE COPY

BEST AVAILABLE COPY

- d. Container and pesticide disposal instructions for this product for containers larger than 1 gallon should be:

Storage and Disposal

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

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

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.

Instructions for 1 gallon and less than 1 gallon should be:

Disposal

Do not reuse empty container. Rinse empty container thoroughly and discard in trash.

2. Submit a statement certifying your packages meet the standards for special packaging stated under the Child Resistant Packaging Regulations. (Refer to 40 CFR 162.16 "Pesticides Requiring Special Packaging" and the *Federal Register*, Vol. 46, No. 41, Tuesday, March 3, 1981, pages 15104 to 15109, "Clarification of Policy Issues on Special packaging," for guidance and proper submission requirements.)

However you may wish to voluntarily restrict your product to use by servicepersons only, which would not require child resistant packaging. To do this, you must print on the label or temporarily apply as a sticker on the label, or on the container for all sizes in which this product will be marketed, the following statement:

Only for Sale To, Use and Storage by Service Personnel

BEST AVAILABLE COPY

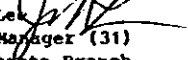
This statement must be at least the same type size as the Child Hazard Warning statement and preferably placed in the upper front panel.

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

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

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

Sincerely yours,


John H. Lee
Product Manager (31)
Disinfectants Branch
Registration Division (TS-767C)

Enclosure

BEST AVAILABLE COPY

USE DIRECTIONS

(Note: Use soft water for dilution)

For Cleaning

LIGHTLY SOILED AREAS — surfaces to be cleaned should be mopped or brushed with a solution containing 1 ounce of CLEANSAN 537 per 5 gallons of water. Rinse cleaned area with fresh water.

HEAVILY SOILED AREAS — mop or brush soiled surface with a solution containing 2-3 ounces of CLEANSAN 537 per 5 gallons of water. Rinse cleaned surface with fresh water.

General Purpose Disinfection

To disinfect walls, floors and other hard surfaces in processing plants, restaurants, rest rooms and other public areas, mop or brush surface to be treated with a solution containing 1 ounce of CLEANSAN 537 per 5 gallons of water. Surfaces that are heavily soiled should be cleaned with 2 ounces of CLEANSAN 537 per 5 gallons of water then disinfected.

To disinfect locker rooms, shower stalls, walkways around pools and other areas where fungicidal action is required, mop area with a solution containing 1 1/2 ounce per 5 gallons of water. This solution will destroy Trichophyton Interdigitale, a causative agent of athlete's foot.

Sanitization

To sanitize walls, floors and equipment in processing plants, first clean thoroughly with a solution containing 1/2 ounce of CLEANSAN 537 per 5 gallons of water. If surface is heavily soiled, use CLEANSAN 537 at a rate of 2-3 ounces per 5 gallons to insure thorough cleaning. Sanitize cleaned surface with a rinse solution containing 1/2 ounce of CLEANSAN 537 per 5 gallons of water.

CLEANSAN 537

DISINFECTANT - CLEANER - SANITIZER - FUNGICIDE - DEODORANT

ACTIVE INGREDIENTS

Methyldodecylbenzyl trimethyl ammonium chloride 80%
methylododecyl-xylene bis (trimethyl ammonium chloride) 20% 25.0%

INERT INGREDIENTS

ACCEPTED 75.0%

with COMMENTS

In EPA List of Pesticides

5202-16

E.P.A. Reg. No. 5202-16-AA

FEB 02 1967

DANGER

Under the Federal Insecticide, Fungicide, and Rodenticide Act

See First Aid and other precautions on side panel.

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MANUFACTURED BY

BROGDEX COMPANY

1441 West Second Street, Pomona, California

EPA Est. No. 5202-CA-1

NET CONTENTS

5 U.S. GALLONS

REGISTERED PATENT