

SEP 25 2003

Mr. Robert Sloan
Lonza Inc.
17-17 Route 208
Fair Lawn, NJ 07410

Subject: Barquat 50-65A
EPA Registration No. 6836-285
Amendment Date: June 25, 2003
EPA Receipt Date: June 30, 2003

Dear Mr. Sloan,

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with the following conditions listed below.

- Update First Aid Statements per PR Notice 2001-1

Conditions

Revise the label as follows:

1. The Agency has completed risk assessments to characterize the chemical, Alkyl Dimethyl Benzyl Ammonium Chloride (ADBAC). During this process, the acute toxicology profile was determined for Manufacturing Use Products (MUP) with an active ingredient concentration ranging from 40% to 80% and End-Use Products (EP) that are formulated repackages of MUPs in the aforementioned concentration range. According to this data, this product is classified as tox. II for acute inhalation, so the "Precautionary Statements" must be revised by adding the following statements:

May be fatal if inhaled. Do not breathe spray mist. For handling activities, wear one of the following NIOSH-approved respirators: 10a non-powered cartridge respirator equipped with a high efficiency particular air (HEPA) filter or a dust mist filtering respirator (MSHA/NIOSH approval # prefix TC-21C).

2. Revise the "First Aid" statements by adding **"If inhaled: 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."**


SYMBOL						
SURNAME						
DATE						

- 3. Under "First Aid," bold the subheadings (If swallowed/If in eyes/If on skin or clothing), so the statements stand out on the label.
- 4. According to the Agency's use site database for this active ingredient, "residential premises" is not supported. You must either delete this use site or submit an amendment adding it to the label. (Reminder: If you choose to add the use site, you must address data compensation.) Also, delete the use site, public access premises. Your label needs to be more specific in terms of the sites which will be treated.
- 5. The statement which follows the product name at the top of the right column is too broad. The Agency is moving toward revising MUP labels to list the specific sites at which a product may be formulated for use, not the pesticidal claims associated with those uses. Revise the statement: "For Formulation into Antimicrobial Products" to read: "*For use by manufacturers only in formulating antimicrobial products for the uses indicated on the label.*"

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies 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 Jacqueline McFarlane at (703) 308-6416.

Sincerely,


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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals
DANGER. Corrosive, causes irreversible eye damage and skin burns. May be fatal if inhaled or swallowed. Harmful if absorbed through the skin. Do not get in eyes, on skin or on clothing. Wear protective clothing, goggles or face shield and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse. Do not breathe spray mist. For handling activities exposures, wear one of the following NIOSH-approved respirators: (10 a non-powered cartridge respirator equipped with a high efficiency particular air (HEPA) filter (MSHA/NIOSH approval number prefix TC-21C).

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. 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.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or flame.

BARQUAT 50-65A

For Formulation into Antimicrobial Products

Active Ingredient

Alkyl (C ₁₂ -67%; C ₁₄ -25%; C ₁₆ -7%; C ₁₈ -1%) dimethyl benzyl ammonium chloride.....	50.0%
Inert Ingredients.....	50.0%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

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.

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.

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.

EPA Reg. No. 6836-285

EPA Est. No. 6836-IL-1

Manufactured By:
Lonza Inc.
17-17 Route 208
Fair Lawn, NJ 07410

DIRECTIONS FOR USE

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

For formulation into Antimicrobial Products for use in wood preservatives, industrial process water systems such as recirculating cooling water and industrial waste water treatment; swimming pools and spas; non-food contact areas of agricultural premises/equipment, ~~schools and public places~~ and commercial, institutional and industrial premises/equipment; and food handling/storage establishments.

STORAGE AND DISPOSAL

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

Storage: Store in original container. Keep container closed when not in use.

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: (Metal Containers): 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.

(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 other means. If burned, stay out of smoke.

ACCEPTED with COMMENTS in EPA Letter Dated:

SEP 25 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 6836-285

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