

6836-292

8-22-2003
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

4/3

AUG 22 2003

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

Subject: Bardac 2880
EPA Registration No. 6836-292
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 these chemicals, Alkyl Dimethyl Ammonium Chloride (ADBAC) and Didecyl Dimethyl Ammonium Chloride (DDAC). During this process, the acute toxicology profile was determined for Manufacturing Use Products (MUP) with an active ingredient concentration ranging from 40% to 80%. According to this data, this product is classified as follows:

Primary Eye	Tox I
Primary Skin	Tox I
Acute Inhalation	Tox II
Acute Oral	Tox II
Acute Dermal	Tox III
Sensitization	Yes

CONCURRENCES							
SYMBOL	7510C						
SURNAME	9/26/03						
DATE	8/18/03						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2/3

Thus revise the Precautionary Statements to read exactly as follows:

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. Do not breath vapor. Wear a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C). Wear protective eyewear (goggles or face shield), protective clothing and rubber gloves. *Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals*. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse."

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.**"
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. Under the "Directions for Use," delete the use site, "water treatment microbiocides." Your label needs to be more specific in terms of the sites which will be treated: i.e. swimming pools, industrial cooling towers, etc.
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 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)

Enclosure: Stamped Label			CONCURRENCES				
SYMBOL	7510C	T.Lantz:8/8/03:6836-292					
SURNAME							
DATE							

LONZA

1717 ROUTE 21A
MAPLETON, INDIANA 46051-1000
TELEPHONE (317) 601-1700

HEALTH	3
FLAMMABILITY	2
REACTIVITY	0

BARDAC® 2880

For Formulation into Antimicrobial Products

Active Ingredients:	Octyl Decyl Dimethyl Ammonium Chloride	40.0%
	Diocetyl Dimethyl Ammonium Chloride	20.0%
	Didecyl Dimethyl Ammonium Chloride	20.0%
Inert Ingredients:	20.0%
Total:	100.0%

CAS NO: MIXTURE
EPA Reg. No. 6836-292
EPA EST. No. 6836-IL-1

KEEP OUT OF REACH OF CHILDREN

DANGER

UN1903

DISINFECTANTS, CORROSIVE LIQUID, N.O.S.
(DIALKYL DIMETHYL AMMONIUM CHLORIDE)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER! CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Wear protective eyewear, protective clothing 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.

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 a 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.

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

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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

DO NOT USE OR STORE NEAR HEAT OR FLAME!

DIRECTIONS FOR USE

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

This product is a concentrate for formulating purposes only. This product is to be used in formulating antimicrobial products intended for: commercial, institutional, and industrial premises and equipment (hard surfaces, floors, walls, and storage areas); medical and/or institutional critical care and noncritical care premises and laundry; domestic dwellings, food handling areas, bathroom premises (hard surfaces), and indoor premises; eating establishment premises and equipment; food processing plant, food handling, and food distribution premises and equipment; agricultural and/or farm premises, buildings, structures, and equipment; dairy farm milk handling facilities, houses, sheds, equipment, and storage rooms; and

Formulators using this product are responsible for providing data for the EPA registration of their formulated products.

NOTE: This product should not be used or compounded with any reducing or oxidizing agents (such as calcium hypochlorite, solid perchlorate, or nitric acid) since such mixtures may be explosive. Do not use in conjunction with soap or any anionic wetting agent.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Do not store on side.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, 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 incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

FOR HELP IN A CHEMICAL EMERGENCY
CALL CHEMTREC 1-800-9300.

BEFORE USING CONSULT MATERIAL
SAFETY DATA SHEET.

CODE NO.
(P)

LOT NO.(S)

WEIGHT.
(Q) lb. kg.

NUMBER:

ACCEPTED
with COMMENTS
in EPA Letter Dated:

AUG 22 2003

Under the Federal Insecticide,
and Rodenticide Act as
amended, for the pesticide,
under EPA Reg. No. 6836-292

CONSHOHOCKEN, PA

FAIR LAWN, NJ

LOS ANGELES, CA

MAPLETON, IL

PAINESVILLE, OH

PASADENA, TX

WILLIAMSPORT, PA