

JUL 11 2002

Mr. Richard Retzloff
Products Chemical Company
6400 Herman Ave
Cleveland, OH 44102

Subject: Wintergreen
EPA Registration No. 8503-13
Amendment Date: March 30, 2002
EPA Receipt Date: April 17, 2002

Dear Mr. Retzloff,

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

- Update storage/disposal, environmental hazards, and first aid statements

Conditions

Revise the label as follows:

1. Under "for general disinfecting of...", you will need to qualify the surface, tile, as hard non-porous by stating "glazed" tile. Also, you will need to delete "appliances" since "this product must not be used on food contact surfaces."
2. Since this product serves as a deodorizer, cleaner, and disinfectant, it is inappropriate to refer to the product as "DISINFECTANT" for use solution preparation and label claims, delete "Disinfectant," and replace it with the product's registered name, "WINTERGREEN."
3. Under "Cleaning/Deodorizing garbage cans ... equipment," revise the instructions to state "It is especially important to preclean in order for the *product* to perform properly. Then apply a wetting solution of 8 oz of *Wintergreen* per gallon of water."

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4. Revise the "Disinfection" directions to state "Pre-clean surfaces as directed above. Prepare 5 oz of Wintergreen per gallon of water. Thoroughly wet hard non-porous surfaces with a cloth, mop, or sponge. Surfaces must remain wet for 10 minutes. If desired, wipe with a clean cloth or allow surfaces to air dry.
5. Under the Federally inspected meat and poultry plants claim, add the statement, "Follow the disinfection directions."
6. According to the last stamped label, this product is categorized as III for acute oral toxicity and primary skin irritaiaon.
7. Based on past submissions, this product is sold in 1 and 5 gallon containers. You must maintain 2 separate Storage and Disposal sections on the "Master" label (Agency's label copy), one set is for containers 1 gallon or less, and the other is for containers more than 1 gallon. Revise this section as follows"

(Containers 1 gallon or less)

Storage and Disposal

Keep product under locked storage inaccessible to children. Do not store near heat or open flame. Do not reuse empty container. Discard in trash.

(Containers greater than 1 gallon)

Storage and Disposal

Do not contaminate food, feed, or water by storage or disposal. Do not store near heat or open flame.

Storage: Keep product is locked storage inaccessible to children.

Pesticide Disposal: Language on label is acceptable

Container Disposal: Language on label is acceptable

8. Based on past submissions, this product is sold in 1 and 5 gallon containers. You will need to add the following Environmental Hazards text to the label.

(Containers 5 gallons or larger)

Environmental Hazards

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.

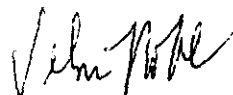
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General Comments

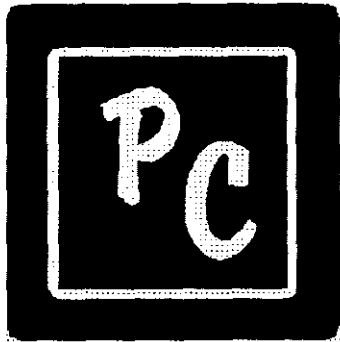
A stamped copy of the labeling accepted with conditions is enclosed for your records. Submit two (2) copies of the final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Jacqueline McFarlane (703) 308-6416.

Sincerely,



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



Demonstrating Quality Since 1942™

WINTERGREEN

DISINFECTANT - CLEANER - DEODORANT

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 17 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. *8503-13*

**KEEP OUT OF REACH OF CHILDREN
DANGER**

ACTIVE INGREDIENT	
Alkyl (C14, 58%; C16, 28%; C12, 14%) dimethyl benzyl ammonium chloride	2.00%
INERT INGREDIENTS	98.00%
Total	100.00%

SEE BACK PANEL FOR PRECAUTIONARY STATEMENTS AND FIRST AID

NET CONTENTS: ONE GALLON



8503-13 Front Panel

4/5

Cross-contamination is of major housekeeping concern not only in hospitals, but in schools, institutions and industry. This Disinfectant is formulated for this problem area. It both cleans and disinfects effectively when used as directed. Its hard surface disinfecting action will reduce the hazard of cross-contamination from environmental surfaces. When used as directed, this disinfectant will deodorize surfaces in toilet areas, behind and under sinks and counters, garbage cans and garbage storage areas and will inhibit the growth of mold and mildew and their odors when used as directed.

DIRECTIONS FOR USE

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

FOR GENERAL DISINFECTING of hard, nonporous, inanimate surfaces (glass, metal, plastic, glazed porcelain, linoleum, tile, leather, vinyl, enamel and finished wood surfaces) on walls, floors, appliances and furnishings in industrial and commercial offices, restrooms and work areas.

CLEANING AND DEODORIZING. Whenever practical, flush away gross soils with water. For cleaning and deodorizing, use 5 to 8 ounces of DISINFECTANT per gallon of water. Cleaning may be accomplished with a clean mop, sponge, squeegee, wet vacuum system, or a mechanical spraying device. After cleaning, remove suspended soils with a clear water rinse, vacuum or pick up by wiping with a clean mop, sponge, squeegee or cloth.

DISINFECTING. Before disinfecting, preclean surface as directed above. Then, prepare 5 ounces of DISINFECTANT per gallon of water and thoroughly wet the surfaces to be disinfected. The disinfecting solution must contact the surface for 10 minutes for proper disinfection. If desired, the surfaces may then be rinsed with clear water or wiped with a clean, damp cloth.

FOR CLEANING AND DEODORIZING OF GARBAGE CANS, GARBAGE TRUCKS, INDUSTRIAL WASTE RECEPTACLES, AND OTHER GARBAGE HANDLING EQUIPMENT. It is especially important to preclean in order for the disinfectant to perform properly. Then apply a wetting solution of 8 ounces of DISINFECTANT per gallon of water.

FOR CLEANING OF WALLS, FLOORS AND INDUSTRIAL WORK AREAS. Use 5-8 ounces per gallon of water. The use of rubber gloves is recommended for personnel doing continuous hand cleaning.

THIS DISINFECTANT is effective against a wide variety of gram-positive and gram-negative bacteria. Kills: *Salmonella choleraesula* ATCC 10708, *Staphylococcus aureus* ATCC 6538, *Streptococcus pyogenes* ATCC 9342, *Escherichia coli* ATCC 11279, *Enterobacter aerogenes* ATCC 13048, *Shigella sonnie*, *Candida albicans*.

THIS DISINFECTANT is also an excellent deodorant. It is especially effective in controlling odors that are bacterial in origin.

This DISINFECTANT mixes readily with water and makes a clear, stable solution. In use dilution it is noncorrosive and nonstaining to plastic, vinyl, synthetics, enamel, tile, and most common metals. Has a pleasant mint odor. May be used through automatic floor scrubbing equipment.

THIS PRODUCT MUST NOT BE USED ON FOOD CONTACT SURFACES.

SOLD BY
PRODUCTS CHEMICAL CO.
CLEVELAND, OH 44102

Recommended for use in Federally inspected meat and poultry plants on all hard, nonporous surfaces in inedible product processing areas, non-processing areas and/or exterior areas. All surfaces must be thoroughly rinsed with potable water.

PRECAUTIONARY STATEMENTS HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Avoid contact with the skin. Harmful if inhaled. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. 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 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 treatment advice. Have the product container or label with you when calling a poison control center or doctor of going for treatment.

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

STORAGE AND DISPOSAL

Keep product under locked storage, inaccessible to children. Do not reuse empty container. Rinse thoroughly, securely wrap empty container in several layers of newspaper, pad, discard in trash or recycle.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray or mixture of 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 Wastes 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 incinerate, or if allowed by state and local authorities, burn. If burned, stay out of smoke.

EPA Reg. No. 8503-13

EPA Est. No. 8503-OH-1

ACCEPTED
With COMMENTS
in EPA Letter Dated:
JUL 11 2002



This container is coded for recycling
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
made for the pesticide,
registered under EPA Reg. No. 8503-13