UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

8503-13 12/16/2005

DEC 1 6 2005

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

Subject:

Wintergreen Disinfectant

EPA Registration No.: 8503-13

Amendment Date: November 16, 2005 EPA Receipt Date: November 22, 2005

Dear Mr. Retzloff,

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

Update First Aid Statements per PR Notice 2001-1

Conditions

Please revise the label as follows:

- 1) This product is classified as category III for acute oral toxicity. The "First Aid" statement must be revised to include the statement, "IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have a 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."
- The Agency has mandated registrants adopt the "Master Label" which contains all claims, use sites, directions, storage/disposal statements, and environmental hazard statements on one label. Based on the submitted information, your product is sold in 1 and 5 gallon containers. According to PR Notice 83-3 and 84-1, you must maintain 2 separate Storage and Disposal sections, one set is for containers 1 gallon or less, and the other is for containers greater than 1 gallon. According to PR Notice 95-1, all products sold in containers 5 gallons or greater must support "Environmental Hazard" statement. You must revise your label as follows:

(Containers 1 gallon or less): Storage and Disposal

Store in original container in areas inaccessible to children. Store in a dry place, no lower .

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(Containers greater than 1 gallon)

Storage and Disposal

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

Pesticide Storage: Store in original container in areas inaccessible to children. Store in a dry

place, no lower temperature than 50oF or higher than 120oF.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray, or mixture of rinsate is 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 incinerate, or if allowed by state and local

authorities, burn. If burned, stay out of smoke.

(Containers 5 gallons or greater)

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans of 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

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions regarding this letter, please contact Jacqueline McFarlane at (703) 308-6416.

Sincerely

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C)

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Cross-contamination is of major housekeeping concern not only in hospitals, but in schools, institu-tions 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 mildew and their odors when used as directed.

DIRECTIONS FOR USE

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

FOR GENERAL DISINFECTING of hard, non-porous, inanimate surfaces (glass, metal, plastic, glazed porcelain, linoleum, glazed tile, leather, vinyl, enainel and finished wood surfaces) on walls, floors, 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 WINTERGREEN per gallon of water. Cleaning may

be accomplished with a clean mop, sponge, squeeges, 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. Pre-clean surfaces as directed above. Then, prepare 5 ounces of WINTERGREEN per gallon of water. Thoroughly wet hard non-porous surfaces with a cloth, mop, or sponge. Surface must remain wet for 10 minutes. If desired, wipe with a clean cloth or allow surfaces to air dry.
FOR CLEANING AND DEODORIZING OF GARBAGE CANS, GARBAGE TRUCKS, INDUSTRIAL WASTE RECEPTACLES, AND OTHER GARBAGE HANDLING EQUIPMENT. It is especially important to precise in order for the product to perform properly. Then apply a wetting solution of 8

OUNCES OF WINTERGREEN 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

WINTERGREEN is effective against a wide variety of gram-positive and gram-negative bacteria. Kills: Salmonella choleraesula ATCC 10708, Stapphylococcusaureus ATCC 6538, Streptococcus pyogenes ATCC 9342, Escherichia coli ATCC 11279, Enterobacter aerogenes ATCC 13048, Shigelia somnie, Candida albicans. WINTERGREEN is also an excellent deodorant. It is especially effective in controlling odors that are

hacterial in origin

WINTERGREEN 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..



Demonstrating Quality Since 1942 SM

WINTERGREEN

DISINFECTANT - CLEANER - DEODORANT

ACTIVE INGREDIENT

Alkyl (C14, 58%; C16, 28%; C12, 14%) dimetryl

benzyl ammonium chloride

INERT INGREDIENTS

98,00% 100,00%

KEEP OUT OF REACH OF CHILDREN

See side panel for additional precautionary statements and first aid EPA Reg. No. 8503-13 EPA Est. No. 8503-OH-1

NET CONTENTS: ONE GALLON

Recommended for use in Federally inspected meat and poultry plants surfaces in inedible product processing areas, non-processing areas a surfaces must be thoroughly rinsed with potable water.

PRECAUTIONARY STATEMENTS HAZARDOUS TO HUMANS AND DOMESTIC AN

DANGER. Corrosive. Causes irreversible eye damage. Do not get in Wear protective eyewear (goggles, face shield or safety glasses). Av Harmful if inhaled. Avoid breathing sprey mist. Wash thoroughly with handling. Remove contaminated clothing and wash clothing before re-FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for contact lenses, if present, after the first 5 minutes, then continue rinsin CLOTHING: Take off contaminated clothing. Rinse skin immediately 15-20 minutes. IF INHALED: Move person to fresh air. If person is n an ambutance, then give artificial respiration, preferably by mouth-to-rr Call a poison control center or doctor for treatment advice. Have the s with you when calling a poison control center or doctor of going for tre-NOTE TO PHYSICIAN: Probable mucosal damage may contraindicat lavage. Measure against circulatory shock, respiratory depression, at needed.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE PESTICIDE STORAGE - Store in a dry place no lower in temperature

Store in original container in areas inaccessible to children. CONTAINER DISPOSAL - Do not reuse empty container. Wrap conta PESTICIDE DISPOSAL - Pesticide wastes are acutely hazardous. In excess pesticide, spray or mixture of rinsate is a violation of Federal la cannot be disposed of by use according to label instructions, contact y Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

PRODUCTS CLEVEL

