

APR 1 1994

Guy H. Moberg
 Director of Leather Division
 Blumberg Company, Inc.
 311 E. Norport Drive
 Port Washington, WI 53074

Dear Mr. Moberg:

SUBJECT: Label Amendment and Revised Confidential Statement of
 Formula
 Vita-San 10
 EPA Reg. No. 10145-3
 Your Letters Dated 11/30/93 and 02/25/94

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

1. Change the ENVIRONMENTAL HAZARDS section to read the following:

"This product 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."

2. Change the PHYSICAL/CHEMICAL HAZARDS section to read the following:

"Do not use or store near heat or open flame. Use with adequate ventilation."							
SYMBOL	7505C						
SURNAME	T. Stone						
DATE	03/10/94						

2043

3. In regards to your submission dated 02/09/94 which requested a change in signal word from DANGER to WARNING, the acute toxicological data (MRIDs 43124501 - 43124503) and revised Confidential Statement of Formula dated 01/31/94 are currently in review. Further labeling changes may be required depending upon the results of these reviews.

If you have any questions, please contact Terri Stowe of my staff at (703) 305 - 6117.

Sincerely yours,

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Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosure

Precautionary Statements
Hazards to Humans and Domestic Animals

DANGER

CORROSIVE: Causes eye damage and skin irritation. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. Avoid contamination of food.

FIRST AID STATEMENT: In case of contact. Immediately flush eyes or skin with plenty of water for a least 15 minutes. Call a physician. Remove contaminated clothing before re-use.

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 product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL/CHEMICAL HAZARDS: Do not use or store near heat of open flame. Use with adequate ventilation.

DIRECTIONS FOR USE

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

Dissolve Vita-San 10 into retanning or fat-liquoring oils prior to application. Use 1-2% Vita-San 10 based on wet weight of leather. Apply fatliquor as per normal formulation.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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.

1 Gallon weighs 7.9 pounds



ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 1 1984

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

10145-3

Prevents Mold and Mildew
On Leather

ACTIVE INGREDIENT:
ORTHOPHENYLPHENOL
INERT INGREDIENTS:
TOTAL

For Industrial Use Only

DANGER

Keep Out of Reach of Children

EPA Reg. No. 10145-3

EPA E

See Side Panel for Additional Precautions

Net Contents:

400 LBS



Newburyport, MA. 01

BEST AVAILABLE COPY