



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 22, 2003

Guy H. Moberg Sr.
Consultant
Blumberg Company, Inc.
2130 South Saint Aubin
Sioux City, Iowa 51106

Subject: **Vita-San 10**
EPA Registration No. 10145-3
Application Dated October 2, 2003

Dear Mr. Moberg:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comments.

Proposed Label Amendment

Label revisions per PR Notice 2001-1

Label Comments

- 1. For label clarity and consistency revise the First Aid Statement to read:

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> - Call a Poison Control Center or doctor immediately for treatment advice. - Have person sip a glass of water if able to swallow. - Do not induce vomiting unless told by a Poison Control Center or doctor. - Do not give anything by mouth to an unconscious person
IF IN EYES	<ul style="list-style-type: none"> - 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. - Call a poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> - Move person to fresh air. - If person is not breathing, call 911 or an ambulance, then give artificial respiration preferably mouth-to-mouth if possible. - Call a poison control center or doctor for further treatment advice.

CONCURRENCES

SYMBOL	SURNAME	DATE					

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> - Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes. - Call a poison control center or doctor for treatment advice
HOT LINE NUMBER	
<p>In case of an emergency call toll free (registrants fill in the number). Have the product container or label with you when calling a poison control center or doctor or going for treatment."</p>	
NOTE TO PHYSICIAN	
<p>"Product contains petroleum distillates. Vomiting may cause aspiration pneumonia." Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

The following statements are suggested types of information that may be included, if applicable:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

2. Add the sentence directly below the Storage and Disposal heading to read as follows:

Storage and Disposal

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

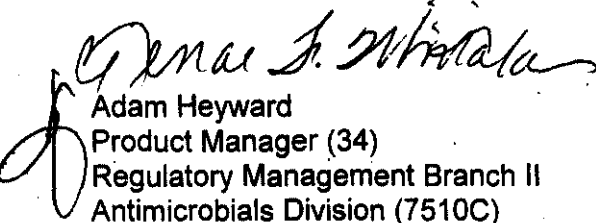
Refer to PR Notice 83-3 for detailed information.

General Comments

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

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,


 Adam Heyward
 Product Manager (34)
 Regulatory Management Branch II
 Antimicrobials Division (7510C)

Enclosure

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Precautionary Statement
Hazard to Humans and Domestic Animals

"WARNING"

Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Causes substantial but temporary eye injury, wear goggles or face shields (safety-glasses). Avoid breathing vapors may be harmful if inhaled. May cause skin irritation, remove contaminated clothing and wash before re-use. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Wash thoroughly with soap and water after handling.

"FIRST AID"

IF SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor get medical attention. Do not give any liquids to the person. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly & gently with water for 15-20 minutes. Remove Contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or a doctor for treatment advice.

IF INHALED: Remove person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing and wash before reuse. Wash skin with plenty of soap and water. See a doctor if irritation persist.

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

ENVIRONMENTAL HAZARDS: 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 Pollution 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 treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

EMERGENCY PHONE CHEMTREC 800-424-9300

Have product label with you when calling poison control or doctor or going for treatment.

"NOTE TO PHYSICIAN"

Product contains petroleum distillates. Vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage

• • • "DIRECTIONS FOR USE"

It is a violation of Federal Law to use this product in a manner inconsistent with labeling. Dissolve "Vita-San 10" into resin or fat-liquoring oils prior to application. Use 1.6-2% Vita-San 10 based on wet weight of leather. Apply fatliquor as per normal formulation.

• • • "STORAGE AND DISPOSAL"

Pesticide Storage: Store at room temperature away from heat or open flame. Keep container tightly closed when not in use. Do not store near or contaminate feed, food or drinking materials.

Pesticide Disposal: Waste resulting from the use of this product may be disposed 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.

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 22 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 10145-3

Vita-San
10

Prevents Mold and Mildew
On Leather

ACTIVE INGREDIENT:
ORTHOPHENYLPHENOL.....10.95%
OTHER INGREDIENTS89.05%
Total...100.00%

This Product Contains Petroleum Distillates.

For Industrial Use Only.

WARNING
Keep Out of Reach of Children

See Side Panel for Additional Precautionary Statements.

EPA Reg. No. 10145-3 EPA Est. No. 10145-MA-1

- Net Contents -

50.63 GAL.

400 LBS.

181 KGS.

1 GAL = 7.9 LBS

VITASAN
Blumberg
VITAGUM
VITASOL
COMPANY INC
P.O. BOX 1328
NEWBURYPORT MA 01950
(978) 465-0409 FAX (978) 462-5477