



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 30, 2003

Guy H. Moberg Sr.
Industrial Consultant
Blumberg Co., Inc.
P.O. Box 430
Newburyport, MA 01950

Subject: **Vita-San #33**
EPA File Symbol Number 10145-4
Your Application Dated April 17, 2003

Dear Mr. Moberg:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following comments.

Proposed Action

- Update label in accordance with LRM and PR Notice 2001-1

Labeling comments

1. Revise Precautionary Statement to read:

**PRECAUTIONARY STATEMENT
Hazards to Humans and Domestic Animals
Danger**

Corrosive. Harmful or fatal if swallowed. Causes eye and skin damage. Do not get in eyes, on skin or clothing. Wear goggles or face shield and rubber gloves when handling. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

2. Revise the first aid statement to read as follows:

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.
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 (1-800-424-9300). 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.

Refer to PR Notice 2001-1 for detailed information

3. Revise the Storage and Disposal section to read as follows:

Storage and Disposal

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

Pesticide Storage: (You must add appropriate text)

Pesticide 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...and local authorities.

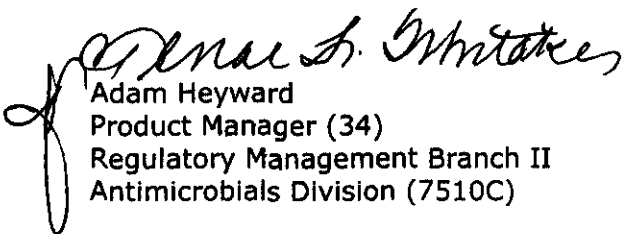
Refer to PR Notice 83-3 for detailed information.

Other 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.

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)

Precautionary Statements
Hazards to Humans and Domestic Animals

DANGER

Corrosive Causes irreversible eye damage may cause skin irritation. Do not get in eyes. Wear protective eyewear (goggles, face shield, or safety glasses.) Wear protective clothing and gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before re-use.

"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. Do not give any liquid 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. See a doctor.

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.

PHYSICAL/CHEMICAL HAZARDS: 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**

"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. Apply to crusted or finished leathers by scrubbing, spray or roller machine. Apply Approximately 800 sq. ft. per gallon. Drying in warm drying tunnel aids drying time.

"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.



ACCEPTED
with COMMENTS
EPA Letter Dated:

Prevents Mold and Mildew
On Leather

SEP 30 2003

ACTIVE INGREDIENT:
ORTHOPHENYLPHENOL..... 3.92%
OTHER INGREDIENTS 96.08%
Total...100.00%

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

This Product Contains Petroleum Distillates.

For Industrial Use Only.

DANGER
Keep Out of Reach of Children

See Side Panel for Additional Precautionary Statements.

EPA Reg. No. 10145-4 EPA Est. No. 10145-MA-1

- Net Contents -

55.1 GAL.

375 LBS.

170 KGS.

1 GAL = 6.8 LBS



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