

11715-33

8-18-2003
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 18 2003

William L. Washburn
Regulatory Affairs Manager
SPEER Products Incorporated
P.O. Box 18993
Memphis, TN 38118-0993

SUBJECT: Magic Guard Disinfectant/Sanitizer/Deodorizer
EPA Registration Number: 11715-33
Application Date: May 8, 2003
Receipt Date: May 28, 2003

Dear Mr. William Washburn:

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

- Update First Aid Statements
- Update Disposal Statements

Conditions

1. As stated previously, the use of the term "restrooms" is too broad as you have not included directions which would be appropriate for all restroom surfaces. You have not included directions for use on toilet bowls. Delete the site "restrooms" and the surface "toilet bowls" from the right panel on the first page of you label.

2. Delete the term "etc." and the parenthesis surrounding "locker rooms, corridors, classrooms" as well as the parenthesis following "steel, chrome, glass, vinyl" and the "etc." Your label must be specific and the language in parenthesis is not optional.

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3. Revise the label to include the following statement in each section (Household, Hospitals, Salon, and Deodorizer) of the label. "Remove gross filth and heavy soil deposits from surfaces then apply as follows." The similar statement on the first page of the label beginning: "Note: Before using Magic Guard, first remove gross filth..." may be deleted from the label.

4. Revise the phrase "Application/Timing" as it appears on the first and second pages to read "Contact Time" such that your label will be consistent with other labels in the market place.

5. Revise each set of directions (Household, Hospitals, Food Processing Equipment, Dairies, Restaurant, Salon, and Deodorizer) to state: "Prepare fresh solution daily or more often if solution becomes diluted or soiled."

6. Add the following statement to the directions for use in hospitals: "At this level this product is effective against *Pseudomonas aeruginosa*."

7. Revise the directions for "Food processing equipment" by deleting the statement beginning: "Thoroughly clean and rinse all equipment before applying Magic Guard sanitizing solution, then immerse or wet thoroughly all food processing equipment and food utensils." and replacing with the following as per DIS/TSS-17 as previously requested: "Remove gross food particles and soil by a preflush, or pre-scrape and when necessary, pre-soak. Wash thoroughly with a good detergent or compatible cleaner, followed by a potable water rinse. Dilute Magic Guard according to the chart below. Immerse or wet thoroughly all food processing equipment and food utensils with solution. Allow product to contact surface for 1 minute, then drain and air dry."

8. Revise the directions for "Dairies" by deleting the statement beginning: "To sanitize dairy equipment, first clean and rinse equipment..." and ending "...with the sanitizing solution." and replacing with the following as per DIS/TSS-17 as previously requested: "Remove gross food particles and soil by a preflush, or pre-scrape and when necessary, pre-soak. Wash thoroughly with a good detergent or compatible cleaner, followed by a potable water rinse. Dilute Magic Guard according to the chart below. Immerse or wet thoroughly all dairy equipment with solution. Allow product to contact surface for 1 minute, then drain and air dry."

9. Revise the directions for "Restaurant and Bar Rinse" by deleting the statement beginning: "Dishes, glassware..." and ending "...rinse thoroughly and immerse." and replacing with the following as per DIS/TSS-17 as previously requested: "Sanitize dishes, glassware, silverware, and cooking utensils with this product. Remove gross food particles and soil by a preflush, or pre-scrape and when necessary, pre-soak. Wash thoroughly with a good detergent or compatible cleaner, followed by a potable water rinse. Dilute Magic Guard according to the chart below. Immerse food utensils in this solution. Allow product to contact surface for 1 minute.

10. Revise the directions for "Salon Use" to state "Magic Guard is for use as a disinfectant on barber..." as per PR Notice 2000-5 which describes mandatory language.

In addition, correct the chart which describes the rate for this use to state: 0.6 ounces per 1 gallon

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of water.

11. Revise the directions for use as a "Deodorizer" as follows: revise to state "Magic Guard is for an effective deodorizer..." as per PR Notice 2000-5 which describes mandatory language.

12. Revise your "Storage and Disposal" statements, for commercial and industrial use, to include the following headings: *Pesticide Storage* and *Pesticide Disposal*. In addition, revise the Pesticide Storage statement to read: "Store in original container *and keep in locked storage.*"

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



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

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MAGIC GUARD

DISINFECTANT/SANITIZER/ DEODORIZER

ACTIVE INGREDIENTS:

n-Alkyl (60% C₁₄, 30% C₁₆, 5% C₁₂, 5% C₁₈)
dimethyl benzyl ammonium chlorides.....5.0%

n-Alkyl (68% C₁₂, 32% C₁₄) dimethyl
ethylbenzyl ammonium chlorides.....5.0%

INERT INGREDIENTS:.....90.0%
100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See First Aid and other precautionary
statements of left panel

NET WEIGHT: _____

MAGIC GUARD
DISINFECTANT/SANITIZER/DEODORIZER IS A
CONCENTRATE TO BE DILUTED BEFORE
USING.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
DANGER

Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Wear goggles or face shield, rubber gloves and protective clothing when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

EPA Reg. No. 11715-33
EPA Est. No. 11715-TN-1

ACCEPTED
with **COMMENTS**
in EPA Letter Dated

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

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FIRST AID

- 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.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

- 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.

IF SWALLOWED:

- Call 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 to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-757-4943 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock respiratory depression and convulsion may be needed.

DIRECTIONS FOR USE

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

NOTE: Before using Magic Guard, first remove gross filth and heavy soil deposits from surfaces then apply

in recommended use-dilution as indicated below:

For treatment of hard nonporous surfaces, such as: Floors, Walls, Garbage pails, Sink tops, Shower stalls, Bathroom fixtures, Food processing equipment, Dairy equipment, Telephones

For Use in Schools, locker rooms, corridors, classrooms, Homes, Office buildings, Hospitals and Nursing homes, Dairies, and Restaurants.

HOUSEHOLD

For treatment of hard nonporous surfaces, such as: Floors, Walls, Garbage pails, Sink tops, Shower stalls, and Bathroom fixtures. For use in every area/room of the home. Magic Guard may be used on hard nonporous surfaces such as: stainless steel, chrome, glass, vinyl,

Apply solution with mop or cloth. There is no need to rinse Magic Guard. Mix product as needed for sanitizing, disinfecting, and deodorizing:

Application/Timing	Amount of concentrate	Amount of water
Sanitizer- Leave on for 1 minute	1 oz.	4 gals.
Disinfectant- Leave on for 10 minutes	3 oz.	5 gals.
Deodorizer- Leave on for 1 minute	1 oz.	4 gals.

Kills Staphylococcus aureus and Salmonella choleraesuis.

HOSPITALS, NURSING HOMES AND DENTAL OFFICES

For treatment of hard nonporous surfaces, such as: Floors, Walls, Garbage pails, Sink tops, Shower stalls, Bathroom fixtures, Telephones and Dental equipment surfaces.

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical

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medical devices prior to sterilization or high level disinfection.

Surfaces must be wetted thoroughly with Magic Guard by wiping, mopping, or scrubbing. There is no need to rinse Magic Guard. Mix product as needed for disinfecting:

Application/Timing	Amount of concentrate	Amount of water
Disinfectant- Leave on for 10 minutes	3½ oz.	5 gals.

FOOD PROCESSING EQUIPMENT

This product is to be used on hard nonporous surfaces. Thoroughly clean and rinse all equipment before applying Magic Guard sanitizing solution, then immerse or wet thoroughly all food processing equipment and food utensils.

Before using this product, food products and packaging materials must be removed from the room or carefully protected.

NO POTABLE WATER RINSE IS ALLOWED

When concentrate is mixed as instructed the available ppm is equal to 195(ppm).

Application/Timing	Amount of concentrate	Amount of water
Sanitizer- Leave on for 1 minute	1 oz.	4 gals.

DAIRIES

This product is to be used on hard nonporous surfaces. To sanitize dairy equipment, first clean and rinse equipment thoroughly, then immerse or wet thoroughly with the sanitizing solution.

Before using this product, food products and packaging materials must be removed from the room or carefully protected.

NO POTABLE WATER RINSE IS ALLOWED

When concentrate is mixed as instructed the available ppm is equal to 195(ppm).

Application/Timing	Amount of concentrate	Amount of water
Sanitizer- Leave on for 1 minute	1 oz.	4 gals.

Follow recommendations of local Health Board.

RESTAURANT AND BAR RINSE

This product is to be used on hard nonporous surfaces. Dishes, glassware, silverware, cooking utensils, wash with soap or synthetic detergent; rinse thoroughly and immerse.

NO POTABLE WATER RINSE IS ALLOWED

When concentrate is mixed as instructed the available ppm is equal to 195(ppm).

Application/Timing	Amount of concentrate	Amount of water
Sanitizer- Leave on for 1 minute	1 oz.	4 gals.

- All surfaces are to be air dried after treatment.

SALON USE

This product is to be used on hard nonporous surfaces. Magic Guard may be used as a disinfectant on barber tools such as: scissors, razors, combs, brushes, and clipper attachments. Mix solution as directed and immerse tools-no need to rinse before using.

Application/Timing	Amount of concentrate	Amount of water
Disinfectant- Immerse for 10 minutes	1 oz.	1 gal..

DEODORIZER

This product is to be used on hard nonporous surfaces. Magic Guard may be used as an effective deodorizer by mixing this application:

Application/Timing	Amount of concentrate	Amount of water
Deodorizer- Leave on for 1 minute	1 oz.	4 gals.

FOR HOMEOWNER/RESIDENTIAL USE:

STORAGE AND DISPOSAL

STORAGE: Store in original container and keep in locked storage area.

DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

FOR COMMERCIAL/INDUSTRIAL USE:

STORAGE AND DISPOSAL

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

STORAGE: Store in original container.
DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or 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 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 incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[Distributors may chose to use their own emergency numbers and times of operation]

MANUFACTURED BY:
SPEER PRODUCTS, INC.
4242 B. F. GOODRICH BLVD.
MEMPHIS, TN 38118

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