

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

16 JUL 1991

Scott Paper Company
dba Sani-Fresh International
4702 Goldfield Drive
San Antonio, TX 78218

Attention: Patti L. Lynn
Marketing Development Manager

Subject: Super-Qwik Concentrate Multi-Duty Bowl Cleaner
EPA Registration No. 13215-1
Your Labeling Dated December 19, 1990

Dear Ms. Lynn:

This is in regard to your resubmission of labeling in response to the Agency letter dated September 24, 1990. That letter was written in response to your amendment for discontinuing your plans to use the two small adhesive labels for the handle of the applicator tool.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. A stamped copy is enclosed for your records.

(1) Submit five copies of the finished labeling (this includes the small adhesive bottle label) before you release the product for shipment.

(2) The subject labeling contains 'serviceperson' statements of a kind that is not permitted. Amend those statements according to the comments below. (We apologize for failing to comment on those statements in our Sept. 24, 1990 letter.)

(a) On the box label, immediately after the "Directions for Use" heading, in the statement "For institutional/industrial use only by qualified servicepersons," delete the phrase "by qualified servicepersons."

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

(b) On the box label, between the signal word "DANGER" and the company name and address, delete the statement, "Only for sale to, use by and storage by qualified servicepersons." (The word "only" may be added onto the end of the sentence, "For institutional/industrial use" if you wish.)

(c) On the small adhesive label for the bottle, along the left-hand border, the statement, "Only for sale to, use, and storage by servicepersons" must be deleted or replaced with a statement such as, "For institutional/industrial use only."

Note that the cleaning wand that holds the product bottle is not subject to the FIFRA labeling requirements for pesticidal "devices" so long as the cleaning wand is not distributed or sold with the pesticide (40 CFR §152.3(t) and 153.240(a)).

If you have any questions about these comments, you may call Wallace Powell at 703-557-6938.

Sincerely,



Ruth G. Douglas
Acting Product Manager (32)
Antimicrobial Program Branch
Registration Division (H-7504C)

Enclosures

SANI-QWIK
Bowl Cleaning System
Concentrate Multi-Duty
Bowl Cleaner

Net Contents:
1 Control Capsule
8 fl. oz. (236.6 mL)

SANI-QWIK
Bowl Cleaning System

SUPER-QWIK
Concentrate Multi-Duty
Bowl Cleaner

SUPER-QWIK
Concentrate Multi-Duty
Bowl Cleaner

**DIRECTIONS FOR USE
FOR INSTITUTIONAL/INDUSTRIAL USE ONLY
BY QUALIFIED SERVICEPERSONS.**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Super-Qwik® has been designed specifically for professional cleaning services in hotels and other establishments where housekeeping is of prime importance. Super-Qwik® concentrates are cleaned by killing microorganisms in toilet bowl and traps. Factory tests have demonstrated that Super-Qwik® used as directed is a proven, fast-acting bactericide and fungicide against *Escherichia coli* type 7 in the presence of organic soil (5% blood serum). Recommended only for use on hard non-porous inanimate surfaces (toilet bowls and urinals) and is to be disposed only out of the Sani-Qwik® Cleaning Cart.

TO DISINFECT, DEODORIZE AND CLEAN



1. **REMOVE WATER**
Force water into the bowl or urinal trap with the Sani-Qwik® Bowl Cleaning Head.
2. **APPLY CLEANER**
Slide Trigger Stop to the "ON" position. Squirt concentrated bowl cleaner under and around the rim—minimum of 3 squirts (1/5 ounce) for toilet bowls and urinals is required.
3. **CLEAN**
Wipe all surfaces with the swab portion of the head, so as to wet thoroughly. Scour with the scrub pad under the flush ring, or to remove stubborn stains.
4. **WAIT**
Allow to remain wet for 10 minutes. Flush. Rinse cleaning head in flush water. Drain head and shake off excess water. Repeat cleaning if necessary.
5. **LOCK/STORE**
Slide the Trigger Stop to the "LOCK" position. Place the cleaning tool in the storage caddy on your cleaning cart.

SUPER-QWIK
Concentrate Multi-Duty
Bowl Cleaner

**PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS**

DANGER
CORROSIVE: Keep Out of Reach of Children.
May be fatal if swallowed. Do not breathe vapors or fumes. Produces chemical burns. Do not get in eyes, on skin or on clothing. Causes eye and skin damage. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling. Use on acid resistant surfaces only.

STATEMENT OF PRACTICAL TREATMENT
IF SWALLOWED: Call a physician immediately. Drink large quantities of water. **EYE CONTACT:** Wash with water for 15 minutes. Get prompt medical attention. **SKIN CONTACT:** Wipe off acid gently. Flood surface with water using soap freely, then cover with moist magnesium or baking soda.

STORAGE AND DISPOSAL
Do not reuse empty container. Wrap empty container in plastic bag and discard in regular trash collection. Do not contaminate water, food, or feed by storage or disposal.

Cleans • Deodorizes • Disinfects

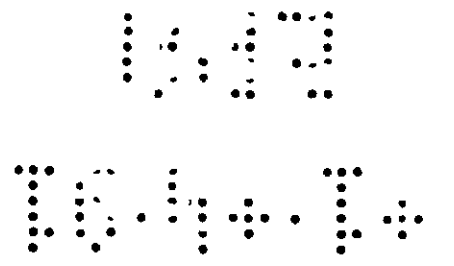
EPA REG. NO. 13215-1	EPA EST. NO. 13215-1X-01
ACTIVE INGREDIENTS	
Phosphoric Acid	45.0%
n-Alkyl (60% C14, 30% C16, 5% C12, 5% C18)	
dimethyl benzyl ammonium chlorides	2.5%
n-Alkyl (68% C12, 32% C14)	
dimethyl ethylbenzyl ammonium chlorides	2.5%
INERT INGREDIENTS	50.0%
(includes surfactants and deodorizing agents)	
TOTAL	100.0%

Keep Out of Reach of Children
DANGER
See label panel for precautionary and first aid statements.
**FOR INSTITUTIONAL/INDUSTRIAL USE ONLY FOR SALE TO
USE BY AND STORAGE BY QUALIFIED SERVICEPERSONS**
Scott Paper Company
dba Sani-Fresh International
San Antonio, TX 78216

Specially formulated for Daily
bowls and urinals. Dispensed from
Wand, this 8 oz. container cleans
regular bowl cleaner.

SUPER CONCENTRATED—cleans
frated cleaner
COATING ACTION—clings to surface
clean
FAST ACTING—removes rust, lime
DISINFECTANT—broad spectrum
for use on inanimate hard surfaces
DEODORIZER—deodorizes as it
in urinals and toilet bowls. Leaves
COLOR SIGNAL—dark green trace
bowl
NON-FUMING—does not produce
Super-Qwik® is **BACTERICIDAL**—
Staphylococcus aureus, Salmonella,
Streptococcus faecalis, Klebsiella,
Shigella dysenteriae, VIRUCIDAL.

SF1 P/N 240036 Rev. 00



APR 1991
WASH DC
U.S. EPA

16 JUL 1991

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BEST

ONLY FOR SALE TO U.S. STORAGE BY SERVICE PERSONNEL
SUPER

ACCEPTED
with COMM. No. 13215-1
to EPA Letter Docket

16 JUL 1991

Break the film on the inside.
Fungicide and disinfectant are
as intended. For use in schools
registered under EPA Reg. No. 13215-1

ONLY FOR SALE TO U.S. STORAGE BY SERVICE PERSONNEL
SUPER

dimethyl benzyl ammonium chlorides ... 2.5%
n-Alkyl (80% C₁₂, 32% C₁₄)
dimethyl ethylbenzyl ammonium
chlorides ... 2.5%
INERT INGREDIENTS: 50.0%
(includes surfactants and
deodorizing agents)
TOTAL 100.0%

DANGER: Keep Out of Reach of Children. See
outer box for precautionary and first aid statements,
storage and complete use directions. **DISPOSAL:** Do not
reuse empty container. Wrap empty container in plastic
bag and discard in regular trash collection.
EPA REG. NO. 13215-1 EPA EST. NO. 13215-TX-01
NET CONTENTS: 8 fl. oz. (236.6 ml)
Sara-Fresh International, Inc., San Antonio, TX 78218

EPA Received Date:
6/26/90

ACTIVE INGREDIENTS:
Phosphoric Acid 45.0%
n-Alkyl (80% C₁₄, 30% C₁₆, 5% C₁₂, 5% C₁₈)
dimethyl benzyl ammonium chlorides ... 2.5%
n-Alkyl (80% C₁₂, 32% C₁₄)
dimethyl ethylbenzyl ammonium
chlorides 2.5%
INERT INGREDIENTS: 50.0%
(includes surfactants and
deodorizing agents)
TOTAL 100.0%

DANGER: Keep Out of Reach of Children. See
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EPA REG. NO. 13215-1 EPA EST. NO. 13215-TX-01
NET CONTENTS: 8 fl. oz. (236.6 ml)
Sara-Fresh International, Inc., San Antonio, TX 78218

BEST AVAILABLE COPY