



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 13, 2020

Jeanette Covert
Representative for
Aceto US LLC
4 Tri Harbor Court
Port Washington, NY 11050

Subject: Notification per PRN 98-10 – Updated company name and graphic insertion
Product Name: CDC Anti-Clog #1 Units
EPA Registration Number: 33427-4
Application Date: January 8, 2020
Decision Number: 559393

Dear Ms. Covert:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Tara Flint via email at flint.tara@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara M Flint".

For
Eric Miederhoff, Product Manager 31
Regulatory Management Branch 1
Antimicrobials Division (7510P)
Office of Pesticide Programs

(TOP PANEL)

CDC ANTI-CLOG® #1 UNITS

PREVENTATIVE MAINTENANCE FOR AIR CONDITIONER CONDENSATE SYSTEMS. CONTROL OF LEGIONNAIRE'S DISEASE BACTERIA in preliminary laboratory tests.
FOR INDUSTRIAL USE ONLY.

ACTIVE INGREDIENTS:

Alkyl (60% C14, 30% C16, 5% C12, 5% C18) Dimethyl Benzyl Ammonium Chloride - 20%

Alkyl (68% C12, 32% C14) Dimethyl Ethylbenzyl Ammonium Chloride - 20%

OTHER INGREDIENTS: - 60%

TOTAL - 100%

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE FIRST AID STATEMENT ON BACK PANEL

~~ACETO CORPORATION~~

~~ACETO US, L.L.C.~~

4 TRI HARBOR COURT
PORT WASHINGTON, NY 11050-4661

PATENT PENDING

EPA REG. NO. 33427-4

EPA EST. NO. 72806-OK-001

NET CONTENTS

BATCH NO:

(FRONT PANEL)

DO NOT REMOVE UNIT HOUSING

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS. See other precautions on the back panel of this container and on the use directions enclosed.

DIRECTIONS FOR USE

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

1. **DO NOT USE IN:** HUMIDIFIERS, HUMIDIFIER SECTIONS OF AIR CONDITIONING SYSTEMS OR EVAPORATIVE COOLERS.
2. Clean condensate pan and drain before installing unit.
3. Place unit in pan, pad side down.
4. In pans with drain connections, place unit under the cooling coil in the middle of pan length.
5. Unit must be in contact with condensate.
6. This unit is designed and approved only for use in drain pans of Air Conditioning Systems and Refrigeration Systems.
7. Has been proven to control the growth of, or inactivate, Legionnaire's Disease Bacteria in experimental laboratory conditions for two (2) months when approximately 15 gallons of water flow over CDC ANTI-CLOG #1 UNITS per day. We recommend replacing CDC ANTI-CLOG #1 UNITS, every 2 months, if that is the intent.

NOTIFICATION

33427-4

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/13/2020

(RIGHT SIDE PANEL)

STORAGE AND DISPOSAL

STORAGE: Store in a dry place no lower in temperature than 50°F or higher than 120°F. Avoid heat, sunlight, friction, contaminating substances; especially anionics, shock, and crushing.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

(LEFT SIDE PANEL)

CONTROLS: Growth of slime forming bacteria which is the major cause of drain blockages. Clean condensate drain and pan.

(BACK PANEL)

DO NOT REMOVE UNIT HOUSING PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or clothing. Wear chemical goggles, protective clothing, and rubber gloves. May be fatal if swallowed, absorbed through the skin, or inhaled. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or smoking tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS: This product is toxic to fish.

FIRST AID:

- If in eyes:
- 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:
- Take off all 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 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 to do so by the poison control center or doctor.
 - Do not give anything by mouth to an unconscious person.
- If inhaled:
- 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For spill, leak, fire, exposure or accident call CHEMTREC® 1-800-424-9300. Outside the USA 1-703-527-3887.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

{the following information contained in the “[]” will appear on the product label that is offered for sale with LDB claims, or as a separate technical information bulletin to accompany final print labeled products}

[Claim for Technical Information Bulletins and Label Language

“There is not enough scientific evidence to demonstrate that controlling the growth of Legionnaire’s Disease Bacteria (LDB) in condensate pans is necessary and/or adequate step in preventing the spread of this disease bacterium, although this possible mode of transmission cannot be entirely disregarded. Even in the absence of complete knowledge about LDB disease transmission and causal relationships of environmental LDB levels and disease outbreak, it is prudent to minimize slime growth and excessive bacterial contamination in condensate pans. This precaution is supported since the limited ecological studies on LDB have shown that the presence of the organism was usually associated with heavy fouling of cooling systems. By reiterating these established recommendations, this does not imply that any type of chemical treatment of air conditioning components will control the growth of LDB, reduce transmission of LDB, or prevent Legionnaire’s disease. Regular treatment with CDC ANTI-CLOG #1 UNITS, following label directions will control the growth of fouling organisms in condensate pans.

In preliminary laboratory tests, CDC ANTI-CLOG #1 UNITS has been shown to inactivate pure cultures of LDB. However, the ability of this formulation to control the growth of, or inactivate, LDB in operating water systems exposed to ultraviolet light, organic material, other microbial contamination, and aeration has not been documented. These preliminary finding also do not address the problem of long-term preventive maintenance of these water systems.]

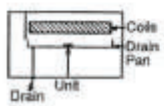
Placement Instructions For Air Conditioning

The unit can be placed in the drain pan flat or on its side depending upon the space between the cooling coil and the drain pan.

SMALL UNIT - FOR EQUIPMENT UP TO 5 TONS
LARGE UNIT - FOR EQUIPMENT OVER 5 TONS AND UP TO 15 TONS
45 TON UNIT - FOR EQUIPMENT UP TO 45 TONS

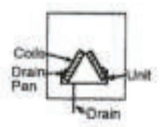
NOTE: FOR LARGER EQUIPMENT USE MULTIPLE UNITS

SMALL UNIT for Vertical or Horizontal Coil



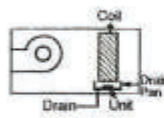
Space between coil and drain pan is more than 3/8". Place unit under cooling coil in middle of pan length, pad side down. Unit must be in contact with condensate. Do not remove unit housing.

SMALL UNIT for "A" Coil or Slant Coil



Space between coil and drain pan is less than 3/8". Place unit on its side between coil and pan edge in the middle of pan length, pad side down. Unit must be in contact with condensate. Do not remove unit housing.

LARGE UNIT for Air Conditioning Equipment Up To 15 Tons



Space between coil and drain pan is usually several inches high. Place unit under cooling coil in middle of pan length, pad side down. Unit must be in contact with condensate. Do not remove unit housing. Use multiple units for equipment over 15 tons.

- IMPORTANT:**
- DO NOT USE IN:**
 - HUMIDIFIERS
 - HUMIDIFIER SECTIONS OF AIR CONDITIONING SYSTEMS
 - EVAPORATIVE COOLERS
 2. Clean condensate drain pan before installing unit.
 3. Place in pan, pad side down, under cooling coil in middle of pan length. Do not remove unit housing.
 4. REMOVE unit from Dual Heating/Air Conditioning equipment before converting to heating use.

Specifications

Chemical Specifications -

Active Ingredients: Alkyl (60% C14, 30% C16, 5% C12, 5% C18) Dimethyl Benzyl Ammonium Chloride - 20%
 Alkyl (68% C12, 32% C14) Dimethyl Ethylbenzyl Ammonium Chloride - 20%
 Other Ingredients: - 60%
 Total: - 100%

Mechanical Specifications -

SMALL UNITS: 2 1/2" long x 2 1/2" wide by 1/2" high, contents 1/4 oz.
 6 1/2" long x 1 1/2" wide by 7/16" high, contents 3/4 oz.

LARGE UNIT: 3 7/8" long x 2 1/2" wide by 7/16" high, contents 2 1/2 oz.

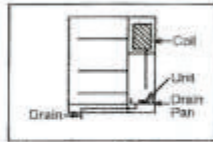
45 TON UNIT: 8 7/8" long x 2 7/16" wide by 1 1/2" high 6 oz.

All statements and specifications are subject to change without notice.

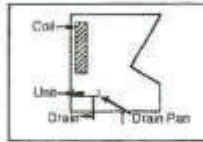
EPA Reg. # 33427-4
 EPA Est. No. 72806-OK-001

Placement Instructions For Commercial Refrigeration

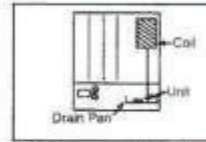
The unit can be placed in the drain pan flat or at an angle, depending upon the space between the refrigeration coil and the drain pan, pad side down.



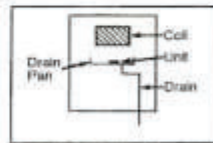
Beverage & Grocery Reach-In Coolers



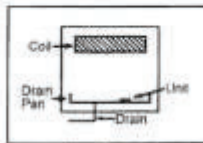
Refrigerated Display Cases



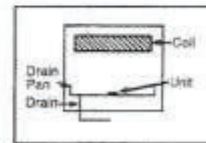
Refrigerated Vending Machines



Cold & Cold Storage Walk-Ins



Ice Makers



Beer Coolers

Directions For Use

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

- DO NOT USE IN:** HUMIDIFIERS, HUMIDIFIER SECTIONS OF AIR CONDITIONING SYSTEMS OR EVAPORATIVE COOLERS.
- Clean condensate pan and drain before installing unit.
- Place unit in pan, pad side down.
- In pans with drain connections, place unit under the cooling coil in the middle of pan length.
- Unit must be in contact with condensate.
- This unit is designed and approved only for use in drain pans of Air Conditioning Systems and Refrigeration Systems.
- Has been proven to control the growth of, or inactivate, Legionnaire's Disease Bacteria in experimental laboratory conditions for two (2) months when approximately 15 gallons of water flow over CDC Anti-Clog #1 Units per day. We recommend replacing CDC Anti-Clog #1 Units, every 2 months if that is the intent.

Do Not Remove Unit Housing.

Do Not Place Unit In Drain Pans Above Food Products Recommended to Replace Unit Every 3 Months.

Precautionary Statements

**KEEP OUT OF REACH OF CHILDREN
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER

CORROSIVE: Causes irreversible eye damage and skin burns. Do not get in eyes, on skin or clothing. Wear chemical goggles, protective clothing and rubber gloves. May be fatal if swallowed, absorbed through the skin, or inhaled. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or smoking tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS: This product is toxic to fish.

FIRST AID:

If in eyes:

- 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:

- Take off all contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.

If swallowed:

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

If inhaled:

- 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For spill, leak, fire, exposure or accident call CHEMTREC® 1-800-424-9300. Outside the USA 1-703-527-3887.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

There is not enough scientific evidence to demonstrate that controlling the growth of Legionnaire's Disease Bacteria (LDB) in condensate pans is necessary and adequate step in preventing the spread of this disease bacterium, although this possible mode of transmission cannot be entirely disregarded. Even in the absence of complete knowledge about LDB disease transmission and casual relationships of environmental LDB levels and disease outbreak, it is prudent to minimize slime growth and excessive bacterial contamination in condensate pans. This precaution is supported since the limited ecological studies on LDB have shown that the presence of the organism was usually associated with heavy fouling of cooling systems. By reiterating these established recommendations, this does not imply that any type of chemical treatment of air conditioning components will control the growth of LDB, reduce transmission of LDB, or prevent Legionnaire's disease. Regular treatment with CDC Anti-Clog #1 Units, following label directions will control growth of fouling organisms in condensate pans.

In preliminary laboratory tests, CDC Anti-Clog #1 Units, has been shown to inactivate pure cultures of LDB. However, the ability of this formulation to control growth of, or inactivate, LDB in operating water systems exposed to ultraviolet light, organic material, other microbial contamination, and aeration has not been documented. These preliminary findings also do not address the problem of long-term preventive maintenance of these water systems.