MAY 18 2005

Mr. William Paris
Vice President
Dickler Chemical Labs, Inc.
P O Box 9523
Philadelphia, PA 19124

Subject:

Lemon Odor Disinfectant

EPA Registration Number 34282-14 Application Dated February 24, 2005

Dear Mr. Paris:

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

Proposed Amendment

Update First Aid and Storage and Disposal

Label Comments:

1. The precautionary statements must be revised to read:

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

corroller. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist. Wear goggles or face shield (safety glasses), protective clothing and chemical resistant rubber gloves. Wash hands before eating, drinking, chewing gum, using the toilet. Remove contaminated clothing and was

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EPA Form 1320-1A (1/90)

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2. As per PR Notice 2001-1, the first aid statement must be revised to read as follows:

FIRST AID

IF IN EYES: Hold eyes 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 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 further 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 by a 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, the give artificial respiration preferably mouth-to-mouth if possible. Call a Poison Control Center or doctor for further treatment advice.

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

In case of emergency call (insert toll-free emergency number if available). Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.

3. Under Directions For Use: Disinfecting: Hospitals, Veterinary Clinics, Nursing Homes add this statement:

For cleaning and disinfecting the following hard, non-porous surfaces: equipment, utensils, instruments, cages, kennels, stables, stalls and catteries. Remove all animals and feeds from premised, animal transportation vehicles, crates etc. Remove all litter, droppings and manure from floors, wall and surfaces of facilities occupied or transversed by animals. Thoroughly clean all surfaces with soap or detergent and rinse with water, Saturate surfaces with a use solution 10 oz. product in 1 1/3 gallons of water (1 part to 18 parts water) (Or equivalent dilution) (625 ppm active quat) for a period of 10 minutes. Ventilate buildings and other close spaces. Do not house animals or employ

equipment until treatment has been absorbed, set or dried. Thoroughly scrub all treated feed racks, automatic feeders, waterers, and other equipment which dispenses food or water with soap or detergent, and rinse with potable water before reuse.

4. Directions For Use: Barber Shop:

Immerse precleaned barber/salon tools, such as combs, brushes, razors, clippers(s) and trimmer blades, tweezers, manicure/pedicure tools and scissors, in a 4 oz. product in 1 1/3 gallons of water (1 part to 41 parts water). Completely immerse instruments and tools for at least 10 minutes. Rinse thoroughly and dry before use. Fresh solution should be prepared at least daily or more often if solution should be prepared at least daily or more often if solution becomes cloudy or soiled.

Note: Plastics may remain immersed until ready to use. Stainless steel shears and instruments must be removed after 10 minutes, rinsed, dried, and kept in a clean non-contaminated receptacle. Prolonged soaking may cause damage to metal instruments.

5. Add the statement of removal of food and food packaging for food/meat processing plants as follows:

Before use in federally inspected meat and poultry food processing plants food products and packaging materials must be removed from room or carefully protected.

A stamped copy of the acceptable labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any question or comments concerning this letter, please contact me at (703) 308-6422 or Drusilla Copeland at (703) 308-6224.

Sincerely.

yelma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C) *Effective at 5 oz/c^1 against *Pseudomonas aeruginosa* PRD-10, *Salmonella chole s ATCC 10708 and *Staphylococcus aureus* ATCC 6538 when sold by the AOAC Use Dilution Test Method for precleaned, hard, non-porous surfaces.

**Also an effective virucide at 5 oz/gal for Influenza virus Type A, Brazil and Herpes simplex Type 2 on inanimate environmental surfaces.

When applied as directed to precleaned hard, non-porous surfaces, this disinfectant also kills the following organisms at 6 ounces per gallon: Candida albicans, Escherichia coli, Streptococcus pyogenes, Enterobacter aerogenes, Shigella sonnei.

DIRECTIONS FOR USE

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

This product may be used through automatic floor scrubbing equipment.

This product must not be used on food contact surfaces.

is product is not to be used as a terminal sterilant/high level dissectant 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 preclean or decontaminate critical or sami-critical devices prior to sterilization or high-level disinfection.

Application Information: Select the proper dilution for your use from the directions below. Apply the use solution with a clean mop, sponge, cloth, squeegee or mechanical scrubber.

Prepare fresh use solutions daily. Do not reuse solutions. Discard countions when they become visibly soiled. For disinfection, thoroughly wet the surfaces to be treated. Surfaces must remain moist for at least 10 minutes to assure proper germicidal action.

Cleaning: To Clean and Deodorize or to Preclean Prior to Disinfection: Depending on the soil level of the area to be cleaned, use 12 to 16 oz of product per gallon of water.

Disinfecting: Hospitals, Veterinary Clinics, Nursing Homes: Use 10 oz of product per 1½ gallons of water (1 part to 18 parts water) one-step cleaning and disinfection of areas with light to medium 1 loads. For heavily soiled areas, preclean as described above and then disinfect with 5 oz product per gallon of water (1 part to 24 parts water).

Industrial Areas, Barber Shaps, Restrooms, Restaurants, Food and Meat Processing Plants (non-rood processing areas), Other Non-Medical Uses: Preclean surfaces. Then disinfect with a solution of 4 oz product in 1½ gallons of water (1 part to 41 parts water). Alternatively, clean and disinfect in one operation using 10 oz product per 1½ gallons of water.

For Deodosising Garbage Cass, Garbage Trucks, Industrial Waste Receptacles and Garbage-Handling Equipment: It is especially important to preclean for this product to perform properly. Then apply a wetting concentration of 16 oz of product per gallen of water (1 part product to 8 parts water).

For Mildew Control: Follow directions for hospital disinfection. Repeat treatment every seven days or when new growth appears.

Lemon Odor Disinfectant

Disinfectant, Cleaner, Boodorant

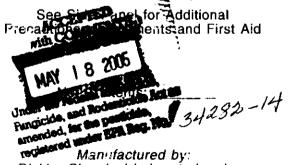
*Kills Pseudomonas, Salmonella and Staphylococcus. **Virucidal.

Active Ingredients:

> EPA Reg. #34282-14-EPA Est. #34282-PA-01

KEEP OUT OF REACH OF CHILDREN DANGER

For Use in Industria!, Commercial or Medical Areas Only



Manufactured by:
Dickler Chemical Laboratories, Inc.
P.O. Box 9523
Philadelphia, PA 19124

PRECAUTIONARY STATEM TS HAZARDS TO HUMANS AND DOM: ANIMALS

Danger: Causes severe eye and skin damage. Do not get in eyes, on skin or on clothing. Harmful if swallowed. Avoid contamination of food. Wear goggles or face mask and rubber gloves when handling.

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

Physical or Chemical Hazards: Do not use or store near heat or open flame.

FIRST AID

If in Eyes: Hold eye open and rinse slowly and gently will water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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 purson control center or doctor. Avoid alcohol. Do not give anything by mouth to an unconscious person.

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or goctor or going for treatment

(5 gallons or larger) ENVIRONMENTAL HAZALLES

Do not discharge effluent containing this product into lates, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

(1 gallon or less) STURAGE AND DISPOSAL

Store in original container in areas inaccessible to children. Do not store on side. Avoid creasing or impacting of side walls. Do not reuse empty container. Wrap and discard in trash or recycle.

(greater than 1 gallon) STOFAGE AND DISPOSAL

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

Pesticide Storage: Store in original container in areas inaccessible to children. Open dumping is prohibited. Do not rease empty container.

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: Plastic Containers: Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, burn. If burned, stay out of smoke.