

MAY 10 2005

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

Subject: **Mint Odor Disinfectant**
EPA Registration Number 34282-15
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. Since this product does not support a claim against *P. aeruginosa*, it cannot be used in hospitals. Therefore, the following statement must be delete.

"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 preclean or decontaminate critical or sem-critical medical devices prior to sterilization or high level disinfection."

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

2. Under the direction "For Cleaning and Deodorizing of Garbage Cans... delete the statement "Then apply a wetting solution of 8 ounces of product per gallon of water" and replace with "Clean as directed above".
3. The precautionary statements must be revised to read:

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

CORROSIVE. 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 tobacco or using the toilet. Remove contaminated clothing and was clothing before reuse.

4. 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.

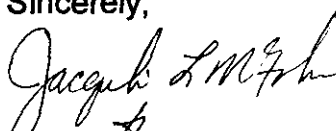
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

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.

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,



Velma Noble

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

Enclosure

When applied as directed to precleaned hard, non-porous surfaces, this disinfectant also kills the following organisms at 5 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.

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 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 semi-critical devices prior to sterilization or high-level disinfection.

For General Disinfection of hard non-porous inanimate surfaces (glass, metal, plastic, glazed porcelain, linoleum, tile, leather, vinyl, enamel and finished wood surfaces) on walls, floors, appliances and furnishings in industrial and commercial offices, restrooms and work areas.

Cleaning and Deodorizing: Whenever practical, flush away gross soils with water. For cleaning and deodorizing, use 5 to 8 ounces of product per gallon of water. Cleaning may be accomplished with a clean mop, sponge, squeegee, wet vacuum system, or a mechanical spraying device. After cleaning, remove suspended soils with a clear water rinse, vacuum pick up or by wiping with a clean mop, sponge, squeegee or cloth.

Disinfecting: Before disinfecting, preclean surfaces as directed above. Then, prepare 5 ounces of product per gallon of water and thoroughly wet surfaces to be disinfected. The disinfecting solution must contact the surface for 10 minutes for proper disinfection. If desired, the surfaces may then be rinsed with clear water or wiped with a clean damp cloth.

For Cleaning and Deodorizing of Garbage Cans, Garbage Trucks, Industrial Waste Receptacles and Other Garbage Handling Equipment: It is especially important to preclean, in order for the disinfectant to perform properly. Then apply a wetting solution of 8 ounces of product per gallon of water.

For Cleaning of Walls, Floors and Industrial Work Areas: Use 5 to 8 ounces per gallon of water. The use of rubber gloves is recommended for personnel doing continuous hand cleaning.

Mint Odor Disinfectant

Disinfectant, Cleaner, Deodorant

Kills:

Salmonella choleraesuis ATCC 13708,
Staphylococcus aureus ATCC 8538.

Active Ingredient:

Alkyl (C14, 58%; C16, 28%; C12, 14%)
dimethyl benzyl ammonium chloride 2.0%

Inert Ingredients: 98.0%

Total Ingredients: 100.0%

Contains methyl salicylate

EPA Reg. #34282-15-_____
EPA Est. #34282-PA-01

KEEP OUT OF REACH OF CHILDREN DANGER

For Use in Industrial and Commercial Use Only

See Side Panel for Additional
Precautionary Statements and First Aid

Net Contents: _____

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

Under the Federal Insecticide, Fungicide, and Rodenticide Act, amended for the purpose, registered under EPA Reg. No. 34282-15

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Causes eye damage and skin irritation. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful if swallowed. Avoid contamination of food. Avoid breathing spray mist.

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 and 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 with 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 poison 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 doctor or going for treatment.

(5 gallons or larger) ENVIRONMENTAL HAZARDS

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 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) STORAGE 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) STORAGE 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 reuse 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 buried, stay out of smoke.

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