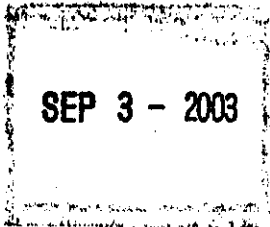


44446-34

9-3-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



Mitch Whitney
Vice President
Quest Chemical Corporation
12255 FM 529
Houston, TX 77041

SUBJECT: Pistol Foaming Germicidal Cleaner
EPA Registration Number: 44446-34
Application Date: June 9, 2003
Receipt Date: June 18, 2003

Dear Mr. Mitch Whitney:

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
- Revise Storage and Disposal Language

Conditions

Revise the label as follows:

1. Delete the site "restrooms" from the first section of the label. "Restrooms" is too broad a term as your label does not include directions for use on all bathroom surfaces including toilet bowls.

2. The following statement is required on your label as per PR Notice 94-4 since your product is for use in Hospitals and lists "bed springs":

"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

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contact with the bloodstream or normally sterile areas of the body, or (2) contact 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 medical devices prior to sterilization or high level disinfection."

3. Revise the "Precautionary Statements" to read exactly as follows:

"Causes substantial but temporary eye injury and skin irritation. Wear protective eyewear (goggles, face shield, or safety glasses). Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing a wash before reuse."

4. Revise your label to include the "Environmental Hazards" statement as per

PR Notice 93-10 for all containers 5 gallons in size or larger. Include the following text: "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."

5. As per PR Notice 2001-1, your "First Aid" statements must be ordered from most toxic route of exposure to least toxic route. Thus reorder your statements as follows: **If In Eyes**, followed by **If on Skin or Clothing**, followed by **If Swallowed** and finally **If Inhaled**.

6. Delete the following text which is not in agreement with PR Notice 2001-1: beginning: "Remove and wash all contaminated..." and ending "...of water. Call a physician."

7. This product does not meet the criteria of PR Notice 2001-6. Delete the entire section beginning: "Product Disposal..." and ending "50°F or higher than 120° F."

Replace with the following text:

(For containers up to 1 gallon in size:)

Securely wrap original container in several layers of newspaper and discard in trash.

(For containers larger than 1 gallon:)

Pesticide Storage: Store in a dry place, inaccessible to children, not lower in temperature than 50° F or higher than 120° F.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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Container Disposal: (metal containers) Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

(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, by burning. If burned, stay out of smoke.

Retain the heading "Storage and Disposal."

General Comments

A stamped copy of the accepted 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 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)

Enclosure: Stamped Label
7510C:T.Lantz:9/2/03:44446-34

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PISTOL FOAMING GERMICIDAL CLEANER

This product is designed for general household cleaning and disinfecting in Homes, Nursing Homes, Hospitals, Institutions, Offices, Schools, Motels and Hotels. When used as directed this product is formulated to disinfect inanimate hard surfaces (such as walls, sink tops, tables, chairs, telephones, door knobs, light switches, shower stalls, hampers, cabinets and bed springs). In addition, this product deodorizes those areas which generally are hard to keep fresh smelling such as garbage storage areas, empty garbage bins and cans, basements, restrooms and other areas which are prone to odors caused by microorganisms. When used as directed, this product demonstrates effective disinfection against Staphylococcus aureus, Salmonella choleraesuis and Pseudomonas aeruginosa, thus meeting requirements for hospital use. Efficacy tests have demonstrated that this product is an effective one-step cleaner-disinfectant in the presence of organic soil (5% blood Serum). This product is fungicidal against Pathogenic fungi (T.mentagrophytes) when used as directed on hard surfaces found in bathroom, shower stall and locker room or other clean hard non-porous surfaces commonly contacted by feet.

MOLD and MILDEWSTAT: This product inhibits mold and mildew and the odors they cause on hard non-porous inanimate surfaces.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. This product has been designed specifically for Household and Institutional cleaning and disinfecting in Homes, Nursing Homes, Hospitals, Offices, Schools, Motels and Hotels.

DISINFECTION, CLEANING and DEODORIZING: To disinfect, clean and deodorize hard non-porous surfaces such as bathroom tiles, fixtures, shower stalls, walls, sinks and bathtubs, proceed as indicated. (1) Hold container six to eight inches from surface to be treated. (2) Spray area until it is covered with the solution. Allow the product to penetrate and remain wet for 10 minutes. No scrubbing necessary. (3) Wipe off with a clean cloth, mop or sponge. The product will not leave grit or soap scum. For heavily soiled areas, remove gross soil before treatment.

MILDEWSTAT: To control mold and mildew on hard non-porous surfaces (such as floors, walls, table tops), spray the surface to be treated, making sure to wet completely. Let air dry. Repeat application at weekly intervals or when mildew growth reappears.

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

WARNING: Keep Out of Reach of Children. Causes eye and skin irritation. Do not get in eyes, on skin or clothing. Harmful if swallowed.

Proof your labels carefully. Date: 1/10/03
Account: Quest Product No. 293
Ink Color: U13 Cap Color: N/A

Customer Signature _____
Date _____



PISTOL

FOAMING GERMICIDAL CLEANER

Cleaner, Deodorizer, Disinfectant, Mildewstat
(On hard inanimate surfaces)

ACTIVE INGREDIENTS:	
n-Alkyl (80% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈) dimethyl benzyl ammonium chlorides	0.105%
n-Alkyl (68% C ₁₂ , 32% C ₁₄) dimethyl ethylbenzyl ammonium chlorides	0.105%
OTHER INGREDIENTS	99.790%
TOTAL	100.000%

EPA Reg. No. 44446-34

EPA Est. No. 44446-TX-1

**KEEP OUT OF REACH OF CHILDREN
WARNING**

Read Side Panel for Additional Precautionary Statements

NET CONTENTS: ONE GALLON

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 3 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 4446-34

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FIRST AID

If inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a poison control center or doctor for further 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 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 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.

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

Remove and wash all contaminated clothing before reuse. If swallowed, drink milk, egg whites, gelatin solution or if these are not available, drink large quantities of water. Call a physician.

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

STORAGE AND DISPOSAL

Product Disposal: Securely wrap original container in several layers of newspaper and discard in trash. **Container Disposal:** Do not reuse bottle. Rinse thoroughly before discarding in trash.

Storage: Store in a dry place, not lower in temperature than 50° F or higher than 120° F.

CONTAINS (CAS #): Water (7732-18-5), 2-Butoxy Ethanol (111-76-2), cocamidopropyl betaine (61789-40-0), edta tetrasodium salt (64-02-8)

ITEM 293

Manufactured By

QUEST
CHEMICAL CORPORATION

Houston, Texas 77041



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