

46043-30

4/16/2010

1 of 4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

APR 16 2010

Kathy Kollen
EPA Coordinator
Suncoast Chemicals Company
14480 62nd Street North
Clearwater, FL 33760

FILE COPY

Subject: Complete 4-In-1 Multi-Purpose Sanitizer
EPA Registration No. 46043-30
Application Date: March 31, 2009
EPA Receipt Date: April 1, 2009

Dear Ms. Kollen:

The following notification submitted in connection with registration under the provisions of PR Notice 98-10, Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)9 is acceptable.

Proposed Notification:

- Revise label to place the First Aid Statement on side panel

Comments:

Based on a review of the material submitted, the following comments apply:

This application for notification to place the First Aid Statement on the side panel, as referenced above, is acceptable. A copy has been placed in our records for future reference.

Should you have any questions concerning this letter, please contact me at Henson.Wanda@epa.gov or call (703) 308-6345.

Sincerely,

Wanda Henson
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)



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March 31, 2010

Ms. Wanda Henson, Acting Team Leader, #32
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**RE: Complete 4-In-One Multi Purpose Sanitizer, #46043-30
Request to Reconsider EPA Notification Response Dated 1/27/10**

Dear Ms. Henson:

Suncoast Chemicals Company is in receipt of your denial to place the First Aid on the side panel of the above-mentioned product. (Copy of your letter is attached.)

We are aware that the Label Review Manual states that the First Aid should appear on the front panel for products classified as toxicity Category I, and that,

“The Agency may, however, permit reasonable variations in the placement of the First Aid statement as long as the reference statement, ‘See First Aid on [identify appropriate panel]’ appears on the front panel...”

We are respectfully requesting you reconsider our request, based on the following statements:

1. This product has an available chlorine level of 84.65% and is lower than most trichloroisocyanuric acid products.
2. Photos of a sample bucket are attached for your review. If we are able to place the First Aid on the *side* of the bucket (screened printed) it will appear in its own *very conspicuous location*. By placing it at this location, the First Aid box would be *much larger* than if it appeared on the immediate front, and easier to locate.

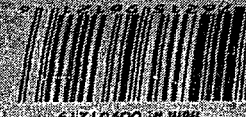
We respect your decision and will abide by your final statement. Thank you very much for your reconsideration.

Sincerely,

Kathy Kollen
EPA Coordinator

Handwritten initials and marks on the right side of the page.

IF IN EYES:	FIRST AID: Hold eye open and flush with water for 15 minutes. Remove contact lenses, if present, after the first flush. Flush for a total of 30 minutes. Flush for a longer period if advised by the attending doctor.
IF ON SKIN OR CLOTHING:	Wash all contaminated clothing, shoes, and accessories thoroughly with soap and water. Wash skin with soap and water. Call a poison control center or doctor for treatment advice. If you have been treated by a doctor, do not take any further action. Do not take any further action if you have been treated by a doctor. Do not take any further action if you have been treated by a doctor.
IF SWALLOWED:	Call a poison control center or doctor for treatment advice. If you have been treated by a doctor, do not take any further action. Do not take any further action if you have been treated by a doctor. Do not take any further action if you have been treated by a doctor.
IF INHALED:	Move person to fresh air. If person is not breathing, stop. If person is breathing, then give artificial respiration. If person is not breathing, then give artificial respiration. If person is not breathing, then give artificial respiration. If person is not breathing, then give artificial respiration.



Manufactured by
SUNCOAST CHEMICALS COMPANY
 14600 24th St. N., Greenwater, FL 33766

IN CASE OF EMERGENCY:
 1-800-255-3924

NOTIFICATION
 Date Reviewed: *11/11/00*
 Reviewed By: *W. Heavner*

SUNCOAST COMPLETE

3" Large Individually Wrapped
 Stabilized Chlorinating Tablets

94.05%
 5.95%
 100.00%
 AVAILABLE CHLORINE: 84.65%
 *TriChloroisocyanuric Acid Dry

KEEP OUT OF REACH OF CHILDREN

DANGER SEE FIRST AID AND ADDITIONAL PRECAUTIONS ON BACK PANEL

SUNCOAST LETFE

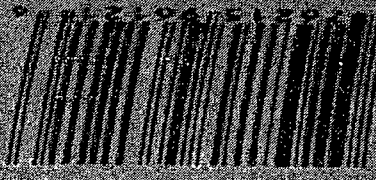
Large Individually Wrapped
Stabilized Chlorinating Tablets

94.05%
5.95%
100.00%
AVAILABLE CHLORINE..... 84.65%
Trichloroisocyanuric Acid Dry

KEEP OUT OF REACH OF CHILDREN
DANGER (SEE REVERSE) ADDITIONAL PRECAUTIONS ON BACK PANEL

IF IN EYES:	FIRST AID: Hold eyes open and flush slowly and gently with 15-20 minutes. Remove contact lenses if present after first 5 minutes, then continue flushing. If irritation continues, flush contact lenses and eye. Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING:	Take off contaminated clothing. Flush skin 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 do so. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anyone anything to eat or drink.
IF INHALED:	Move person to fresh air. If person is not breathing, call 911 or an ambulance. Then get someone to call the poison control center or doctor for further treatment advice.
	NOTE TO PHYSICIAN: Probable mucosal damage may contribute to the use of gent. long.

Manufactured By
SUNCOAST CHEMICALS COMPANY
14480 62nd St. N., Clearwater, FL 33760



Item #: 00961219

IN CASE OF EMERGENCY:
1-800-255-3924

NOTIFICATION:
Date Reviewed: *10/1/88*
Reviewed By: *H. Hoff*