

50584-5

8/9/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Abigail Downs  
Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street Suite 1000  
Washington DC 20036

AUG -9 2013

SUBJECT: Pro-Treat 151 Pan Treatment  
EPA Registration Number: 50584-5  
Application Dated: July 17, 2013  
Receipt Date: July 17, 2013

Dear Ms. Downs:

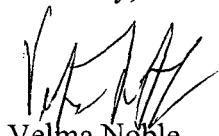
This letter acknowledges receipt of the notification identified above submitted under the provisions of section 3 (c) 9 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended and PR Notice 98-10 and 40 CFR 152.46.

- To update the storage and disposal language, precautionary statement, and first aid statement
- To update the Basic and Alternate Confidential Statement of Formula

Based on a review of the submitted information, this notification is acceptable. Your proposed changes will be made part of the record for this file.

Should you have any questions concerning this letter, please contact Emilia Oiguenblik at (703) 347-0199 or Velma Noble at (703) 308-6233.


Sincerely,



Velma Noble  
Product Manager (31)  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide – Section I**

1. Company/Product Number <b>50584-5</b>	2. EPA Product Manager <b>Velma Noble</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>PRO-TREAT 151 PAN TREATMENT</b>	PM# <b>31</b>	
5. Name And Address Of Applicant (Include ZIP Code) <b>Specialty Chemical Manufacturing</b> <b>1633-B High Bridge Road</b> <b>Quincy, FL 32351</b>		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Check if this is a new address

**Section II**

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain Below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

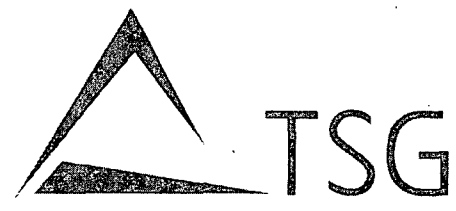
**This notification is to update CSF and label per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.**

**Section III**

1. Material This Product Will Be Packaged In:					
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes"                      No. per Unit Packaging wgt.      Container	If "Yes"                      No. per Unit Packaging wgt.      Container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container <b>100 Tablets, 6.1 oz total weight</b>		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Pager glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name <b>Abigail Downs</b>	Title <b>Regulatory Consultant</b>	Telephone No. (Include Area Code) <b>(202) 828-8992</b>
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title <b>Regulatory Consultant to Specialty Chemical Manufacturing</b>	
4. Typed Name <b>Abigail T. Downs</b>	5. Date <b>July 17, 2013</b>	



**Technology Sciences Group Inc.**

1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, D.C. 20036  
Direct: (202) 828-8992  
Fax: (202) 872-0745  
E-Mail: [adowns@tsgusa.com](mailto:adowns@tsgusa.com)

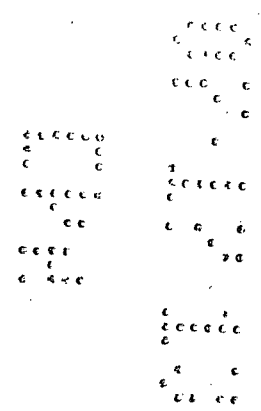
**Abigail T. Downs**  
Regulatory Consultant

Velma Noble

July 17, 2013

Attn: Emilia Oiguenblik  
Antimicrobial Division (7504P)  
Office of Pesticide Products  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

**Re: Notification to Update Label and CSFs**  
**Company Name:** Specialty Chemical Manufacturing  
**Product Name:** *Pro-Treat 151 Pan Treatment*  
**EPA Registration Number:** 50584-5



Dear Velma,

Technology Sciences Group, Inc., on behalf of Specialty Chemical Manufacturing, is submitting the enclosed notification to update the storage and disposal statement, precautionary statement, and first aid statements, as well as to update the CSFs on file with EPA.

On October 26, 2010, Specialty Chemical Manufacturing submitted a notification per PR Notice 2007-4 to revise the storage and disposal statement and revise the precautionary and first aid statements on the product label. This notification was rejected by the Agency on December 3, 2010. Due to some confusion, Specialty Chemical Manufacturing never responded to the Antimicrobials Division's rejection.

On June 7, 2013, TSG, on behalf of Specialty Chemical Manufacturing, submitted a notification nearly identical to this one to update the label and CSFs. On July 8, 2013 the Agency rejected the notification as the proposed storage and disposal and warranty statements were unacceptable. This notification corrects the storage and disposal language per Agency revisions and removes the warranty statement. Per this notification, please see the attached redline product label incorporating those updates based on the Agency's comments.

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The submitted CSFs are identical to those submitted in June, only the date has changed. It is our understanding, per a July 17 phone call between TSG and Emilia Oiguenblik, that the enclosed CSFs are acceptable.

Please find enclosed the following in support of this notification application:

1. 8570-1, Application Form;
2. 8570-4, Confidential Statement of Formula, redline with changes indication;
3. 8570-4, Confidential Statement of Formula, clean (two copies);
4. 8570-27, Formulator's Exemption;
5. Redline version of the label with changes indicated;
6. Three clean copy of the proposed label.

Please do not hesitate to contact me with any questions via phone at (202) 828-8992 or e-mail at [adowns@tsgusa.com](mailto:adowns@tsgusa.com).

Sincerely,



Abigail T. Downs  
Regulatory Consultant to  
Specialty Chemical Manufacturing

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FRONT PANEL

**PRO-TREAT 151 PAN TREATMENT**

For Condensate Drain Pans

[Product No. [PR-151] [Protreat-151]]

[WAGNER. THAT'S WHO]

APPROVED FOR COMPUTER ROOM USE

FOR PROFESSIONAL USE

Active Ingredient:

n-Alkyl (100%-C14) Dimethyl Benzyl Ammonium Chloride Dihydrate.....42.5%

Inert Ingredients:..... 57.5%

Total:.....100.0%

KEEP OUT OF REACH OF CHILDREN

**DANGER**

(SEE SIDE PANEL FOR FIRST AID STATEMENTS)

EPA Reg No.: 50584-5

Net Wt. 6.1 Oz. (172 grams)

EPA EST No.: 50584-FL-01

**NOTIFICATION**  
Date Reviewed: 8/13/13  
Reviewed By: [Signature]

Count 100: Tablets

**PRECAUTIONARY STATEMENTS**

Hazard to Humans and Domestic Animals.

**DANGER:** Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed, absorbed through the skin, or inhaled. Do not get in eyes, on skin or on clothing. Wear face shield or goggles, protective clothing and rubber gloves when handling. Wear a dust mist filtering respirator (MSHA/NIOSH approval # prefix TC-21C). Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

## SIDE PANEL

PRO-TREAT 151 PAN TREATMENT tablets penetrate and stop the (black) algae, fungi and bio-fouling that can plug drain pans, drain lines and foul humidifier pads. [They] [PRO-TREAT 151 PAN TREATMENT tablets] eliminate the odors caused by these organisms. [These tablets] [PRO-TREAT 151 PAN TREATMENT tablets] are 100% soluble, easy to use and do not form any deposits in the pan or drain line. [These tablets] [PRO-TREAT 151 PAN TREATMENT tablets] eliminate odors and maintenance problems from overflow and water damage caused by fouled pans, plugged traps or drains lines.

### **DIRECTIONS FOR USE**

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

Use at least two PRO-TREAT 151 PAN TREATMENT tablets for the initial dose to clean out bio-fouling from algae, fungus and slime. To maintain treatment, simply place one [PRO-TREAT 151 PAN TREATMENT] tablet in the drain pan once a month. For best results, [PRO-TREAT 151 PAN TREATMENT] tablets should be placed in the drain pan so that condensate moistens the tablet as it flows down the pan and into the drain line. To keep drain pans algae, fungi, odor and slime free, use at least one [PRO-TREAT 151 PAN TREATMENT] tablet for each three tons of system cooling capacity.

### **HUMIDIFIERS**

Every four to six weeks, add a PRO-TREAT 151 PAN TREATMENT tablet to the humidifier to control algae, fungus, scale and odor. Use [PRO-TREAT 151 PAN TREATMENT] [the] tablets to keep pads and humidifiers clean and scale free, increase efficiency, lengthen plate life and protect against rust. To properly treat humidifiers in hard water areas, or with larger reservoirs, two or more [PRO-TREAT 151 PAN TREATMENT] tablets may be required. Rinse the reservoir periodically before adding additional [PRO-TREAT 151 PAN TREATMENT] tablets.

### **STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Open dumping is prohibited. Store only in original container. Do not reuse empty container. Store pesticides away from food, pet food, feed, seed, fertilizers, and veterinary supplies. Keep this product under locked storage sufficient to make it inaccessible to children or persons unfamiliar with its proper use.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for Guidance.

**CONTAINER HANDLING:** Non-refillable container. Do not reuse this container to hold materials other than pesticides or rinsate. Triple rinse. Offer for recycling if available or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

<b>FIRST AID</b>	
<b>IF IN EYES</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>IF INHALED</b>	Remove victim to fresh air. If not breathing, call 911 or ambulance, then give artificial respiration, preferably by mouth-to-mouth. Call a poison control center or doctor for further treatment advice.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	
<b>Hot Line Number:</b> Have the product container or label with you when calling a poison control center or doctor or going for treatment. For emergency information on (product, use, etc.), call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	

1633-B High Bridge Road  
Quincy, FL 32351  
[WEBSITE]  
850.875.1716 – Product Information  
800.255.3924 - Chemical Emergencies

MADE IN USA