

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



AUG 15 1995

Controlled Release Technologies, Inc  
18167 US Highway 19 North Suite 270  
Clearwater, FL 34624

Attention: Olivia Laird, Agent  
Lynn Burkhart, Jr. President/Owner

Subject: Panguard RC  
EPA Registration No. 59682-2  
Your Submission Dated April 27, 1995

The Agency has completed its review of the submission submitted above and the review comments are outlined below.

1. Confidential Statement of Formula: This form is incorrectly filled out. Submit a revised CSF for our review which incorporates the following revisions.

a. Block # 15 must be filled in for all ingredients.

b. The two quaternaries must not be separated. Enter onto the CSF only the BTC 2125M. NOTE: The instructions in Block # 10 state: "...List as actually introduced into the formulation..." The quats are not added separately. They are added together at the same time.

c. Delete the confusing reference "...biocidal solution composed of BTC 2125 M & Standamid KD..."

d. The certified limits for BTC 2121M would be 21% and 19% respectively. (upper and lower limits: Blocks 14a & 14b).

e. Just a reminder to redate and resign the CSF which incorporates the above revisions.

2. The polymer information has been added to the file.

3. The information submitted in reference to the fragrance is acceptable and will be permitted to be used in this formulation at this time.

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CONCURRENCES

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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4. The final labels submitted in response to the Registration Notice are unacceptable. A cursory review of these labels indicates that none of the label revisions requested in the Registratrion Notice were included in the submitted final labels. It is your responsibility to submit final labels which reflect all the revisions as outlined in the Registration Notice. A marked copy of the submitted label is enclosed for your review.

5. The amendment (product name change), submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the following labeling changes below before you release the product for shipment bearing the amended labeling.

a. The container disposal heading and the appropriate container statments must be declared on the label.

b. Delete only the word: "the" which appears in the heading: KEEP OUT OF REACH OF CHILDREN.

c. Revise "...Wash thoroughly with soapy water after handling..." to read: Wash thoroughly with soap and water after handling.

d. Delete the words: "Professional" and "trained service personnel".

NOTE: These words will be confused with required statements for restricted use pesticides which permit sale to and use only by certified applicators. Because of the risks posed by restricted use pesticides, the agency believes it is important that the distinction between restricted use and unrestricted pesticides remains always clear to retailers, purchasers and applicators.

6. Our records have been adjusted to reflect your product name change:

OLD PRODUCT NAME: Panguard RC

NEW PRODUCT NAME: Microgu\*rd RC

7. A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, contact V. Goncarovs at 703-305-6663.

Sincerely,

Marion Johnson  
Product Manager (31)

CONCURRENCE  
Microbial Program Branch  
Registration Division (H75050)

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"The Profession's Choice" <sup>SM</sup>

- Eliminates Overflows ● Broad Spectrum Anti-Microbial
- Continuously Cleans ● Lasts For Three Months

**DIRECTIONS FOR USE**

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

For use in drain pans of cooling equipment: air conditioners, refrigerators, coolers, and ice machines.

Slim, flexible **MICRO GUARD RC Series**™ easily fits into air conditioner or refrigeration drain pans, controlling the growth of bacteria in these areas.

Not for use in heat vaporizing or atomizing type vaporizer humidifiers.

Installation Instructions: Remove from plastic bag. **KEEP KNIT ENCLOSURE IN TACT.** Place on the surface of the pan, as close to the cooling coil as possible. Install away from the drain out flow.

For use only by trained service personnel for application in medical, government, commercial, airport, resort, schools, food processing, and industrial areas.



Condensate Drip Pan Micro-Biocide  
for commercial and industrial use.

Active Ingredients:  
Alkyl (60% C<sub>14</sub>, 30% C<sub>16</sub>, 5% C<sub>18</sub>, 5% C<sub>12</sub>) dimethyl  
benzyl ammonium chloride .....10.0%  
Alkyl (68% C<sub>17</sub>, 32% C<sub>14</sub>) dimethyl ethylbenzyl  
ammonium chloride .....10.0%  
Inert Ingredients: ..... 80.0%

**KEEP OUT OF THE REACH OF CHILDREN  
DANGER**

See side panel for additional precautionary statements.

**THIS CARTON CONTAINS**

Gross Count: \_\_\_\_\_

Stock No.: \_\_\_\_\_

Net Content: \_\_\_\_\_

EPA REGISTRATION NO. 59682-2  
EPA EST NO. 59682-FL-001

Manufactured  
Controlled Release  
18167 US  
Clearwater

**PRECAUTIONARY  
HAZARDS TO HUMANS AND**

**DANGER. CORROSIVE:** Causes  
Harmful or fatal if swallowed. (C)  
clothing. To protect skin, wear  
Wash thoroughly with soapy water.

**STATEMENT OF PRACTICAL  
USE:**  
If in eyes, flush with plenty of water.  
If on skin, wash with plenty of water.  
If swallowed, promptly drink large  
amount of water. Avoid alcohol. Get medical  
attention. **Note to physician:** Probable  
contraindicate the use of gastric

**STORAGE AND DISPOSAL:**  
Do not store in food or feed by storage or  
moisture.

**PESTICIDE DISPOSAL:** Pesticide  
hazardous. Improper disposal  
mixture or rinseate is a violation  
cannot be disposed of by use  
contact your State Pesticide or  
or the nearest EPA office for guidance.

RECEIVED  
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