NOV 23 1998

Gary Gaumer President Preserve International P. O. Box 3135 Turlock, CA 95381

Dear Mr. Gaumer:

Subject:

Dyne-O-Might (EPA Reg. No. 66171-6)

Label Amendment

Your Correspondence of July 13, 1998

The Agency has reviewed your label of July 13, 1998 for Dyne-O-Mightand has determined that the label will be acceptable after you make the following modifications.

On the front panel of the label:

- 1. "Aspergillocidal" should be changed to "fungicidal". The Agency does not recognize "Aspergillocidal" as an acceptable term for use on a pesticide label.
- 2. Change "Disinfects in the presence of 50% organic matter and 1000 ppm hard water of extreme organic loads ..." to "This product has been tested using the AOAC test method using a 50% serum load and disinfects moderate organic loads".
- 3. Remove "... built up litter & dirt floors". The Agency registers antimicrobial products that are to be used on hard, non-porous surfaces only. Litter (wood shavings) does not qualify as a hard, non-porous surface, nor does the Agency recognize a "dirt floor" use-site.
- 4. Change "Proven effective against gangrenous dermatitis caused by vegetative clostridium species in 50% organic matter & 1000 ppm hard water with 10 minutes contact" to "Eliminates clostridium perfringenes which has been shown to cause gangrenous dermatitis".

7510W:K.Scanlon:ks:11\04\98:DYNEMIT3.LTR

| | | CO | NCURRENCES | | |
|-----------|---------------------|--------|------------|------|--|
| SYMBOL > | 7510W | | | | |
| SURNAME > | K. Scanion | | <u> </u> | | |
| DATE > | November 4, 1998 | | | | |

Under Description:

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- 5. Change "... in the presence of extremely high levels of organic matter such as dirt floors, built-up litter, blood serum and feces in 10 minutes" to "according to the AOAC test method in the presence of 50% organic load".
- 6. Remove the phrase "Dyne-o-Might is formulated with food grade ingredients." You may be able to obtain this claim in the future if you are able to provide acceptable data supporting this claim to the Agency.
- 7. Remove the phrase "Dyne-o-Might has been formulated to lower the pH of dirt floors and litter on contact in poultry houses creating the optimum conditions for disinfecting." This product is not intended for dirt floors.
- 8. Remove the phrases "Dyne-o-Might upon contact with ammonia chemically neutralizes and binds the ammonia to create ammonium propionates which will yield a residual factor to inhibit molds." and "Dyne-o-Might neutralizes the harmful odors of ammonia and provides dust control properties which keeps the below listed harmful microoganisms from becoming airborne." These are implied health claims for which data would be required.
- 9. Change the phrase "Dyne-o-Might has proven efficacy in 10 minutes in 50% organic matter and 1000 ppm hard water against vegetative Clostridium species known to cause Gangrenous dermatitis in poultry" to "Dyne-o-Might has proven efficacy against vegetative clostridium perfrigens known to cause Gangrenous dermatitis in poultry".
- 10. Change the phrase "The following tests run in conformance with AOAC ... " to read "The following microorganisms have been tested in conformance with AOAC ... ". Remove the heading "TEST METHOD" from above the listed microorganisms.
- 11. Remove the phrase "Wash and disinfect side walls and ceiling of facilities with a suitable detergent and disinfectant. Allow to dry."

A stamped copy of the label is enclosed. Should you have any questions or concerns, please call Kathryn Scanlon on (703) 308-6418.

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Sincerely Yours

Robert S. Brennis
Product Manager 32

Regulatory Management Branch II Antimicrobial Division (7504C) DYNE-O-MIGHT DRAFT LABEL July 13, 1998 Page 1

ACCEPTED with COMMENTS in EPA Letter Dated: NOV 23 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 64

Dyne-O-Might Cleaner - Disinfectant

•STAPHYLOCIDAL •PSEUDOMONACIDAL •SALMONELLACIDAL
•ASPERGILLOCIDAL

• LITTER pH ADJUSTMENT • INHIBITS DUST • CONTROLS AMMONIA
DISINFECTS IN THE PRESENCE OF 50% ORGANIC MATTER
& 1000 ppm HARD WATER OF EXTREME ORGANIC LOADS
SUCH AS BUILT UP LITTER & DIRT FLOORS

PROVEN EFFECTIVE AGAINST GRANGENOUS DERMATITIS
CAUSED BY VEGETATIVE CLOSTRIDIUM SPECIES
IN 50% ORGANIC MATTER & 1000 ppm HARD WATER
WITH 10 MINUTES CONTACT

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No. 66171-6

EPA Establishment No.: 66171-TN-001

DOT SHIPPING NAME

CORROSIVE LIQUIDS, m.o.s., (Propionic Acid), 8, UN1760, PG II

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A. ...

NFPA HAZARD CLASSIFICATION

| HEALTH | FIRE | REACTIVITY | SPECIFIC |
|--------|------|------------|----------|
| 3 | 0 | 2 | Acid |
| | | | |

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DYNE-O-MIGHT expires 12 months from manufactured date of:

DYNE-O-MIGHT DRAFT LABEL July 13, 1998 Page 2

DESCRIPTION

Dyne-O-Might is a multi complex of organic and mineral based acids concentrate containing humectant and salts of such acids combined with a uniquely stabilized Polygroyethylers-colygropytene block polymer-iodine complex which has proven to disinfect in the presence of extremely high evets of organic matter such as dirt floors, built-up litter, blood serum and feces in 10 minutes.

Dyne-O-Might is formulated with food grade ingredients.

Dyne-O-Might has been formulated to lower the pH of dirt floors and litter on contact in poultry houses creating the optimum conditions for disinfecting.

Dyne-O-Might upon contact with ammonia chemically neutralizes and brids the ammonia to create ammonium propionates which will yield a residual factor to inhibit molds.

Dyne-O-Might neutralizes the harmful odors of ammonia and provides due control properties which keeps the below sted harmful microorganisms from becoming airborne.

Dyne-O-Might has proven efficacy in 10 minutes in 50% organic matter and 1000ppm hard water against vegetative Clostridium species known to cause Gangrenous deminatitis in country.

The following tests run in conformance with A.O.A.C. Filteenth Edition and all in the presence of 1000ppm herd water and 50% organic soil. All tests performed at the use dilution (1::20). TEST METHOD

Selmone

Salmonella sphimurium A.T.C.C. 140 Escherichia coli A.T.C.C. 25922 Pasteurella stuttocida A.T.C.C. 43137

Aspergillus funiqueus A.T.C.C. 36607 Aspergillus gaucus A.T.C.C. 14567

urtum A.T.C.C. 14028

TEST METHOD

Staphylococcus aureus A.T.C.C. 6538 Salmonella choleraesuis A.T.C.C. 10708 Pseudomonus seruginosa A.T.C.C. 15442 Salmonella enteritidis A.T.C.C. 13076 Salmonella pullorum A.T.C.C. 9184

Clostridium perfrigens A.T.C.C. 13124 (vegetative cells)

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsisters with its labeling, it is recommended for course spraying the floors of Poultry Houses, Cattle Barns, Swine Facilities, Radite Facilities, Zoos, and other animal raising facilities which require disinfecting in the presence of high leves of organic matter found in such areas as soil, dirt. litter, blood and feces.

Prior to disinfecting with Dyne-O-Might, remove all poultry and feed from premises to assure edequate surface coverage. Remove all portable equipment. Clean all appropriate surfaces. Empsy all water troughs and feed racks. Clean rinse all surfaces with water. Wash and disinfect side walls and ceiling of facilities with a suitable detergent and disinfectant. Allow to dry.

Prepare a solution of Dyne-O-Might at a rate of 5 gallons to each 100 gallons water (1:20). (SEE RECOMMENDED USAGE CHART.)

This solution is to be coarse sprayed from the curtains down to and including the floor of the animal raising facilities, completely wetting the desired area to be disinfected. Allow this solution to remain in contact with surfaces for a period of 10 minutes. Fresh solution should be prepared saly.

Ventilate buildings, coops and other closed spaces. Do not house animas or employ equipment until treatment has been absorbed, set or dried.

Thoroughly scrub treated feed racks, troughs, automatic feeders, fourtains and waterers with soap or detergent and rinse with potable water.

Shoebath Sanitization:

Shoebath containing one inch of freshly made Dyne-O-Might solution (120) smould be blaced at all entrances to animal housing facilities. Change the solution in the shoebath daily to receive optimum effect.

NOTE: DO NOT MIX WITH ALKALINE PRODUCTS.



Manufactured by

Admin to the state of

PRESERVE INTERNATIONAL ZEPHYR COVE, NV 89448, USA Telephone (800) 995-1607

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DYNE-O-MIGHT DRAFT LABEL July 13, 1998 Page 3

| | RECOMMENDED USAGE CHART | |
|----------------|---------------------------|------------------------|
| Squere Footage | Recommended Amount | Amount of Dyne-O-Might |
| To Be Covered | Total Solution To Be Used | CONCENTRATE To Be Used |
| 30,000 | 1,200 gallons | 60 gallons |
| 27,500 | 1,100 gallons | 55 gallone |
| 25,000 | 1,000 gallons | 50 gallona |
| 22,500 | 900 gallons | 45 gallons |
| 20,000 | 900 gallons | 40 gallons |
| 17,500 | 700 gallons | 35 gallons |
| 15,000 | 600 gallons | 30 gallons |
| 12,500 | 500 gellons | 25 gellons |
| 10,000 | 400 gallons | 20 galions |
| 7,500 | 300 gallona | 15 gellons |
| 5,000 | 200 gellona | 10 gallons |
| 2,500 | 100 gellons | 5 gellons |

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals

DANGER - KEEP OUT OF REACH OF CHILDREN. Corrosive. Causes eye damage and severe skin irritation, Avoid breathing scray mist. Do not get in eyes, on altin or on dofting. Protect eyes and skin when handling concentrate. Hamilut wed. Avoid contamination of food. Protective gloves are recommended when working with solution.

ENAPIRONMENTAL HAZARDS: This product is toxic to fish. Keep out of lakes, ponds or streams. Do not contaminate water by ceening of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other water unless in accordance with the requirements of a National Pollutant Substance Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to decharge. Do not discharge effluent containing this product to sever systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

STATEMENT OF PRACTICAL TREATMENT

FIRST AID: In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes. For eyes call a physician. Remove and wash contaminated clothing before reuse. If swallowed, drink large quantities of water. Avoid alcohol and 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

Keep product under locked storage, inaccesible to children. Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

PESTICIDE DISPOSAL:

Pasticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mbdure, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instruction, contact your State Pesticide or Emilronmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guirdance.

CONTAINER DISPOSAL:

Plantic: Trole rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary lambfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Gallions or smaller: Do not reuse empty container. Rinse empty container thoroughly and discard in trash.

Measu: Triple rinse (or equivalent). Then offer for recycling or recondition, or puncture and dispose of in a sanitary

landfill; or by other procedures approved by state and local authorities.

STEPS TO BE TAKEN IN CASE OF A SPILL:

Lasks should be stopped. Spills should be contained and cleaned up immediately. For liquid spills, absorb spill with absorbent material and place in a suitable container or pick up material with a vacuum truck. Mop and then flush spill area with water to remove any residue. Notify local state and federal officials as required,

| NET CO | NTENTS: | U. S. | GALLONS |
|--------|---------|-------|---------|
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