FEB - 7 2007

-Mr. Gary E. Gaumer President Preserve International P. O. Box 17003 Reno, NV 89511

Subject:

Synergize

EPA Registration Number 66171-7 Your Application Dated: July 24, 2006 EPA Received Data: July 28, 2006

Dear Mr. Gaumer:

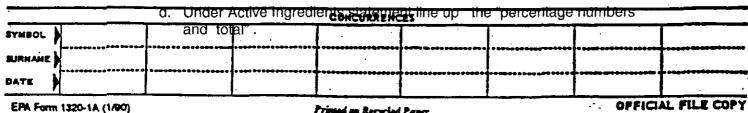
The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable with the following comments:

Proposed Labeling:

Add additional organism (Porcine corcovirus type 2 to label)

Efficacy Review:

- 1. The proposed label claims that the product, Synergize, is an effective disinfectant against Porcine circovirus type 2 on hard, non-porous surfaces in the presence of 1000 ppm hard water and a 5% organic soil load for a contact time of 10 minutes at a 1 ounce per gallon dilution. Data provided supports this claim.
- 2. Make the following changes to the proposed label:
 - a. Under the "Description" section (left panel), change "fiberglass" to read "sealed fiberglass." Fiberglass is a porous surface.
 - b. Under the "Use Directions" section regarding vehicles (left panel), change "course spray" to read "coarse spray."
 - c. Under the list of microorganisms, change "Avian influenza" to read "Avian Influenza virus (H3N2)".



Printed on Recycled Paper

Other Comments:

Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

A stamped copy of the label is enclosed for your records.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C)

Enclosure:

DESCRIPTION

SYNERGIZE is a multi-purpose disinfectant-cleaner. SYNERGIZE provides a broad specfrom kill of gram negative and gram positive microorganisms. SYNERGIZE provides effective disinfecting and cleaning in one operation, SYNERGIZE is effective in warm, soft or hard water (as much as 1000 por CaCO₂) and performs especially well in areas containing 5%.

SYNERGIZE is for use on clazed ceramic and tile surfaces, stainless steel, aluminum, chrome, galvanized metal, tin, brass, zinc, glass, hard non-porous treated wood, polyethylene, polypropylene, PVC (polyvinyl chloride), vinyl, fiberglass, viton, ethylene propylene, nitrile, acrylic and polyurethane.

DIRECTIONS FOR USE:

It is in violation of Federal Law to use this product in a manner inconsistent with its labeling. Registered for disinfecting and cleaning hard non-porous surfaces. Not for use on feed, food

SYNERGIZE cleaner-disinfectant is specifically formulated for industrial use in the tollowing Animal and Poultry Housing facilities: Turkey, Breeder, Grow Out, Fryer, Layer, Hatcheries and Swine Producing Facilities as well as the following equipment in these facil-Ities: Waterers, Feeders, Hauling Equipment, Dressing Plants, Loading Equipment. Farrowing Barns, Nurseries, Blocks, Creep Areas, and Chutes. This product is also for use in Farm Premise, Equine Facilities, Veal Barns, Ratite Facilities (Ostrich, Emu and Rhea. Facilities). Call Pens and associated Farm Vehicles.

USE DIRECTIONS:

To disir* * and clean hard non-porous surfaces of walls, floors, tables, sinks, refrigerator ephone booths, and garbage cans in non-animal areas associated with the sites noted a....e. Apply a solution of 1/2 ounce SYNERGIZE per gallon water (dilute 1:256) in precleaned surfaces. Apply with cloth, sponge, mop or mechanical coarse apray device, making sure all surfaces are wetted thoroughly. Allow surfaces to remain wet for 10 minutes. All surfaces must be rinsed with clean water and allowed to dry before reuse.

BOOT/SHOE WASH: To prevent tracking harmful organisms into animal areas, shoe baths containing one inch of freshly made disinfecting solution should be placed at all entrances to building. Scrape waterproof shoes or boots and place in a 1/2 ounce SYNERGIZE per cal-Ion water solution. Allow the solution to come in contact with the boot/shoe for 10 minutes. Change the disinfecting solution when solution becomes visibly dirty.

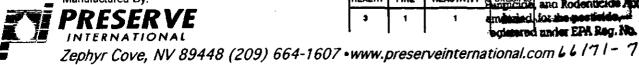
VEHICLES: To disinfect the non-porous, hard surfaces of vehicles use a solution of 1/2. ounce SYNERGIZE per gallon of water. Apply using a high pressure or course spray system. Leave all treated surfaces exposed to solution for 10 minutes, or more and allow to air dry. All treated surfaces that will contact feed or drinking water must be thoroughly scrubbed with soap or detergent then rinsed with potable water before reuse.

DIRECTIONS FOR USE IN SWINE PRODUCING FACILITIES:

- 1) Remove all animals and feed from the premises, vehicles and enclosures.
- 2) Empty all troughs, racks, and other feeding and watering appliances.
- 3) Remove all gross soil, bedding, manure, caked on dirt, spider webs, etc. from walls to ceilings of barns, pens, stalls, chutes, and other facilities occupied or traversed by hogs or other animals
- 4) Thoroughly clean all surfaces with soap or detergent and rinse with water
- 5) Thoroughly saturate all surfaces with a solution of 1/2 oz. SYNERGIZE per gallon of water (1:256), using conventional spraying methods.
- 6) Allow all treated areas to remain in contact with this solution for at least 10 minutes
- equipment used in handling and restmining animals, forks, shovels, and 7\imm sed for removing manure in SYNERGIZE at a dilution of 1:256. Allow to remain in contact for at least 10 minutes.
- 8) Ventilate buildings, and other closed spaces. Do not house swine or other livestock until treatment has been absorbed, set, or dried.
- 9)Thoroughly scrub treated feed racks, troughs, automatic feeders, fountains, waterers and equipment which may come in contact with food with scap or detergent, and rinse with potable water before reuse.

DIRECTIONS FOR USE IN FARM PREMISES, EQUINE FACILITIES, VEAL BARNS, RATITES FACILITIES, CALF PENS AND VEHICLES:

- 1) Do not use in milking stalls, milking pariors, or milk houses.
- 2) Remove all animals and feed from the premises, vehicles, and enclosures.
- 3) Remove all gross soil, bedding, manure, caked on dirt, spider webs, etc. from floors, surfaces, and from walls to ceiling of barns, pens, stalls, chutes, and other facilities occupied or traversed by hogs or other animals.
- 4) Empty all troughs, racks, and other feeding and watering appliances.
- 5) Thoroughly clean all surfaces with soap or detergent and tinse with water
- 6) Thoroughly saturate all surfaces with a solution of 1/2 oz, SYNERGIZE per gallon of water (1:256), using conventional spraying methods. Allow to remain in contact with this solution for at least 10 minutes.



SYNERGIZE

CLEANER-DISINFECTANT

Synergize cleaner-disinfectant is specifically formulated for industrial use in the following Animal and Poultry Housing facil-Ities: Turkey, Breeder, Grow Out, Fryer, Layer, Hatcheries and Swine Producing Facilities as well as the following equipment in these facilities: Waterers, Feeders, Hauling Equipment, Loading Equipment, Farrowing Barns, Nurseries, Blocks, Creep Areas, and Chutes. This product is also for use in Farm Premise. Equine Facilities, Veal Barns, Ratite Facilities (Ostrich, Emu and Rhea Facilities), Calf Pens and associated Farm Vehicles.

Staphylococcus aureus A.T.C.C. 6538 Pseudomonas aeruginosa A.T.C.C. 15442 Salmonella choleraesuis A.T.C.C. 10708 Aspergillus fumigatus A.T.C.C. 38807 Porcine Respiratory & Reproductive Syndrome Virus (PRRS) Avian Influenza Escherichia Coli F18 Porcine circovirus Type 2

ACTIVE INGREDIENTS

Alkyl (Cir 67%, Cir 25%, Cir 7%, Cir 1%) dimethyl benzyl emmonium chloride

Glutaraldehyde	7.00%
WERT INGREDIENTS	.67.00%
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN DANGER

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATE-MENTS

See First Aid statement and additional precautions on side panel

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE:

Store away from heat. Do not transfer to another container. Do not reuse empty container

CONTAINER DISPOSAL:

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

PESTICIDE DISPOSAL:

Pesticide wastes are acutery hazardous, improper disposal of excess pesticide. spray mixture, 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 Environmental Control Agency or the Hazardous Weste representative at the nearest EPA Regional Office for guidance. A.CEPTST:

EPA Registration No.: 66171-73 with COMMENTS EPA Establishment No.: 66171-TN#@PA Letter Dated 66171-CA-001

Patent Number: 5,891,922

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NEPA HAZARD CLASSIFICATION INT. THE PROGRET INSCOLLECT Fine REACTIVITY STREETING and Rodenticide Ax ex ambined for the posticide egierered under EPA Reg. No.

7) immerse all halters, ropes, and other types of equipment used in handling and restraining animals, as well as torks, shovels and acrapers used for removing manure in a solution of 1/2 oz. SYNERGIZE per gallon of water (1:256). Allow to remain in contact for 10 minutes

8) Ventilate buildings, cars, boats, coops and other closed spaces. Do not house poultry or livestock or employ equipment until treatment has been absorbed, set or dried.

9) Thoroughly scrub treated feed racks, troughs, automatic feeders, fountains, waterers and equipment which may come in contact with food with soap or detergent, and rinse with potable water before reuted .

DIRECTIONS FOR USE IN FOULTRY GOOSE. 1) Remove all poultry and leasts from premises, tracks coopseans craiss.

- 2) Remove all litter and of oppings from figure, walls and surfaces of facilities occupied or traversed by poultry.
- Emply all troughs, racks, and other feeding and watering appliances.
- 4) Thoroughly clean all surfaces with soap or detergent and rinse with water.
- 5) Saturate surfaces with 1/2 ounce SYMERGIZE per gallon water (dilute1:256) for a period of 10 minutes.
- Ventillate building, coops, and other closed spaces. Do not house poultry or employ equipment until treatment has been absorbed, set, or dijed.
- 7) Thoroughly scrub treated feed racks troughs, automatic feeders, fountains, waterers and equipment which may come in contact with food with soap or detergent, and rinse with potable water before reuse.

Prior to fogging setters or hatchers, food products and packaging must be removed from the room or carefully protected. After cleaning, fog desired areas using one quart per 1000 cubic feet of room area with a product solution containing 0.25 to 1 ounce per gation water. Vacate all areas of personnel and poultry and feeds for a minimum of 2 hours after fogging. All food contact surfaces, including feed troughs, automatic feeders, and fountains must be disinfected followed by treatment with soap and water or detergent and rinsed with potable water before rause.

*NOTE: The fog generated is very irritating to eyes, skin, and mucous membranes. Under no circurretances should a room or building be entered by envone within two hours of the actual tooging. If the building or room must be entered, then the individuals entering the building must wear a self contained respirator approved by NIOSHIMSHA, goggles, long sleeves and long

FOGGING IS TO BE USED AS AN ADJUNCT TO ACCEPTABLE MANUAL CLEANING AND DISINFECTION OF ROOM AND MACHINE SURFACES.

PRECAUTIONARY STATEMENTS Hazards to humans and domestic animals

DANCED

KEEP OUT OF REACH OF CHILDREN. Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled, Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe apray mist, Wear goggles or face shield. Wear a dust/mist/littering respirator (MSHA/NIOSH approval number prefix TC-21C) or a NIOSH approved respirator with any N, P, R, or HE prefilter. Weer protective clothing and rubber ploves. Prolonged or frequent repeated skin contact may cause allergic reaction in some individuals. Wash hands before eating, drinking, chewing gum, using tobacco or using the tollet. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

FIRST AID

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 ON SKIN OR CLOTHING: Take off contaminated clothing; ringe sidn immediately with plenty of water for 15-20 minutes; call a poison control center or doctor for treatment advice.

IF INNALED: 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 poleon control center or doctor for further 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 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.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or poing for treatment. You may also contact 1 (800) 255-3924 for ameroency medical treatment information. For information on this pesticide (Including health concerns, medical energencies, or pesticide incidents), call the National Pesticide Telecommunications Network at 1 (800) 858-7378.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of quetric layage Measures against circulatory shock, respiratory decreasion and convulsion may be needed.

ENVIRONMENTAL HAZARDS: This product is toxic to flah. Do not apply directly to water Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge affluent containing this product into lakes, streams, ponds, estuaries, oceans or other water 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 N previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Net Contents: U.S. Gallons

Batch No.:

SANITIZING USING A THERMAL FOGGER:

Fogging is to be used as an adjunct prior to acceptable manual cleaning and disinfecting of room surfaces. Close room off so fog is confined to room to be treated. Mix one (1) part SYNERGIZE to five (5) parts water. One (1) gallon of SYNERGIZE to four (5) gallons of water. Insert the nozzle of the fogger through a suitable opening into the room. With the setting on maximum output, fog for one (1) minute to reach 4,000 cubic feet of space in the room with the thermal fogger. Do not allow people to breathe or contact the fog or to enter the room until the fog has completely settled or exhausted. Normally this is 1-4 hours in this environm (less time if area is well ventilated).

*NOTE: The fog generated by this method is very irritating to eyes, skin, and mucous membranes. Under no circumstances should a room or building be entered by anyone until the fog has completely settled, normally 1-4 hours after fogging. If the building or room must be entered, then the individuals entering the building or room must wear a self contained respirator approved by NIOSH/MSHA, goggles, long shirt sleeves and pants.

