



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 10, 2006

Ana Rodriguez-Koster
Microban Systems, Inc
Lewis & Harrison
122 C Street, NW., Suite 740
Washington, DC 20001

Subject: **Clean Carpet Sanitizer**
EPA Registration No. 70263-7
Application Date: June 15, 2006
Receipt Date: June 19, 2006

Dear Ms. Koster:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification:

- Minor Label Changes: Addition of alternate marketing claims
Addition of language to be used by supplemental distributors

General Comment:

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

A copy of the notification is accepted and has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Stacey Grigsby at (703) 305-6440.

Sincerely,

A handwritten signature in black ink that reads "Stacey Grigsby".

/s/ Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

LEWIS & HARRISON

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

Consultants in Government Affairs

June 15, 2006

VIA FEDERAL EXPRESS

Document Processing Desk [NOTIF]
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

ATTENTION: Adam Heyward
Product Manager, Team 34

SUBJECT: *Microban Systems, Inc.*
Clean Carpet Sanitizer (EPA Reg. No. 70263-7)
Notification of Minor Label Changes per PR Notice 98-10

Dear Mr. Heyward:

On behalf Microban Systems, Inc., I am submitting a Notification of minor label changes for their end-use product, **Clean Carpet Sanitizer (EPA Reg. No. 70263-7)**. The purpose of this Notification is to make the following minor changes to the product label:

1. Addition of alternate marketing claims. Please note that the added statements simply rephrase the marketing language present on the latest EPA stamped accepted label dated 2/27/2001.
2. Addition of language to be used by supplemental distributors.

All additions involve no change in the ingredients statement, signal word, use classification, precautionary statements, first aid, physical/chemical properties, storage and disposal, or directions for use language. Furthermore, the additions do not substitute for or conflict with label text, and are not false or misleading.

Enclosed please find the following documents in support of this submission:

1. Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
2. One (1) copy of the proposed product labeling, with changes highlighted; and,
3. One (1) clean copy of the proposed product labeling.

Thank you for your assistance with this submission. If you have any questions, please call me at 202-393-3903 x.17 or e-mail me at alkoster@lewisharrison.com if you have any questions.

Sincerely,



Ana Rodriguez-Koster
for,
Microban Systems, Inc.

Enclosures

cc: Cliff Zlotnik, Microban Systems, Inc.
Bill Todd, Preventec International, LLC

 EPA	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other: Notification	OPP Identifier Number 265394
	Application for Pesticide - Section I		

1. Company/Product Number 70263-7	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Clean Carpet Sanitizer	PM# Team 34	
5. Name and Address of Applicant (Include ZIP Code) Microban Systems, Inc. 4660 Elizabeth Street Coraopolis, PA 15108 <u>PLEASE DIRECT ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		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 _____

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.)

NOTIFICATION OF MINOR LABEL CHANGES PER PR-NOTICE 98-10

Notification of MINOR LABELCHANGES in Accordance With 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 of 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 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: Ana Rodriguez-Koster Date: 6/15/06

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic: <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)		
*Certification must be submitted					
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper 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: Ana Rodriguez-Koster, Lewis and Harrison, LLC 122 C St., NW Suite 740 Washington, DC 20001	Title: Agent for Microban Systems, Inc.	Telephone No. (Include Area Code): (202) 393-3903 ext. 17
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 <u>Ana Rodriguez-Koster</u>		
3. Title: Agent for Microban Systems, Inc.		
4. Typed Name Ana Rodriguez-Koster, Lewis & Harrison LLC		5. Date 6/15/2006

Clean Carpet Sanitizer

For Control of Odor-Causing Bacteria and Fungi

Concentrate Formula

For Extraction, Spin Bonnet, or Immersion/Plant Cleaning

Fungistatic-Bacteriostatic-Deodorizing Cleaner

Effective as a Fungistatic, Bacteriostatic Agent Against Odor Causing Bacteria and Fungi

Commercial Sanitizing Carpet Cleaner Concentrate

Cleans / Sanitizes / Deodorizes

Kills Odor-Causing Microorganisms

For Hospital, Institutional, Industrial and Residential Use

ACTIVE INGREDIENTS

Ortho benzyl chloro phenol.....4.90%

Ortho phenyl phenol.....4.02%

Para tertiary amyl phenol.....1.20%

INERT INGREDIENTS.....89.88%

TOTAL.....100.00%

EPA Reg. No. 70263-7

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panel for additional Precautionary Statements [and First Aid]

FIRST AID

If in eyes:	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • 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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.

Have this product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Net Contents:

[Makes 32 to 128 Gallons Depending on Usage]

[Manufactured by:] [Manufacture for:] [Distributed by:]

Microban Systems, Inc.

4660 Elizabeth Street

Coraopolis, PA 15108

GENERAL INFORMATION

Clean Carpet Sanitizer should be an integral part of any carpet maintenance program. Routine application will not only clean carpet but also kill odor-causing microorganisms and deodorize for cleaner longer lasting carpet. Clean Carpet Sanitizer is a low foaming carpet cleaner formulated for use in hot water extraction, spin bonnet and immersion carpet cleaning processes. Clean Carpet Sanitizer contains three antimicrobial agents to reduce and control the growth of odor causing bacteria and fungi. Clean Carpet Sanitizer also contains odor counteractants to neutralize unpleasant malodors. Clean Carpet Sanitizer is formulated for use on both synthetic and natural fibers. Clean Carpet Sanitizer is recommended for use on stain resistant carpet. Clean Carpet Sanitizer effectively removes greasy soil. Clean Carpet Sanitizer's low foaming formulation resists resoiling.

DIRECTIONS FOR USE

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

TO CLEAN, SANITIZE AND DEODORIZE CARPETS

Light soiling maintenance cleaning extraction: Thoroughly vacuum carpet. Mix one ounce of Clean Carpet Sanitizer per gallon of water. Inject and extract as you would with other extraction cleaners.

Restoration cleaning following water damage: Mix two ounces of Clean Carpet Sanitizer per gallon of water. Inject and extract as you would with other extraction cleaners.

Cleaning equipment equipped with metering devices: Adjust metering device to deliver 2 ounces per gallon of water.

Spin Bonnet (Bonnet Buff) Cleaning: Thoroughly vacuum carpet. Mix four (4) ounces of Clean Carpet Sanitizer per gallon of water. Spray on carpet at a rate of 200-300 square feet per gallon. Scrub with rotary floor machine equipped with bonnet or pad.

For use with disposable bonnets: Mix four (4) ounces of Clean Carpet Sanitizer per gallon of water. Saturate bonnet with diluted Clean solution. Gently wring out excess solution. Discard bonnet after first use.

For plant cleaning of loose rugs: Remove dry loose soil by vacuuming. Adjust equipment to mix 2 ounces of [cleaner] [Clean Carpet Sanitizer] per gallon of water.

For immersion cleaning of loose rugs: Remove dry loose soil by vacuuming. Mix 2 ounces of [cleaner] [Clean Carpet Sanitizer] per gallon of water in cleaning tank. Immerse rug in cleaning solution.

NOTE: Test fibers for colorfastness before use. Apply diluted cleaner to inconspicuous area, and rub with clean white cloth. If color transfers to cloth or changes, a water-based cleaning system should not be used.

After cleaning, set carpet pile in one direction with carpet brush. Place foil carpet tabs or wood/ Styrofoam blocks under furniture legs until carpet is dry.

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes or on clothing. Wear protective clothing, gloves and eyewear (goggles, face shield, or safety glasses). Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish.

(If container is 5 gallons or larger, use the following statements:)

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters 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 previously notifying the local sewage treatment plant authority. For guidance, contact your State Water board or Regional Office of the EPA.

(If container size is greater than 1 gallon, use the following statements:)

STORAGE AND DISPOSAL

Pesticide Storage: Store in a cool, dry, well-ventilated area inaccessible to children.

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 by use 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 Disposal: 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.

(If container size is 1 gallon or less, use the following statements:)

STORAGE AND DISPOSAL

Store in original container in areas inaccessible to small children. Do not store on side. Avoid creasing or impacting of side walls. Do not reuse empty container. Discard in trash (or recycle).