

70908-1

10/8/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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WASHINGTON, D.C. 20460



Office of Pesticide Programs

Kim Davis,
RegWest Company, LLC,
8203 West 20th St., Suite A,
Greeley, CO. 80634-4696

OCT -8 2010

Subject: NAC 7
Registration No.: 70908-1
Date Submitted: September 8, 2010
Date Received: September 9, 2010
Submission #: 882825

Dear Mrs. Davis,

This letter acknowledges receipt of your notification submitted on behalf of Grow More, Inc. under the provision of the Federal Insecticide, Fungicide and Rodenticide Act. (FIFRA). PR Notice 2007-4.

Proposed Notification:

- Deletion of, "General", on the master label, replacing it with, "product".
- Update storage and disposal language.

General Comments:

Based on a review of the submitted material your application for Reg # 70908-1, as listed, is acceptable. A copy has been placed in our records for future reference.

Should you have any questions or comments concerning this letter, please contact Velma Noble PM Team 31 at (703) 308-6233 or Jamil Mixon at (703) 308-8032.

Sincerely,

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

CONCURRENCES

SYMBOL	SURNAME	DATE						

United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number Notification
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Application for Pesticide – Section I

1. Company/Product Number EPA Reg. No. 70908-1	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) NAC 7	PM # 31	
5. Name and Address of Applicant (Include ZIP Code) Grow More, Inc. c/o RegWest Company, LLC 8203 West 20th St., Suite A Greeley, CO 80634-4696 <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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

**Submit Label Revision Notification per PR Notices 98-10 and 2007-4.
Refer to Reference Label for an illustration of all label revisions.**

This notification is consistent with the provisions of PR Notices 98-10 and 2007-4 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 the EPA. I further understand that if this notification is not consistent with the terms of PR Notices 98-10 and 2007-4 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 checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____
*Certification must be submitted		If "Yes" Unit Packaging Wt. No. Per Container	If "Yes" Packaging Wt. No. Per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container <p style="text-align: center;">1 gallon</p>	
5. Location of Label Direction <input checked="" 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"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Other Printed; Self-adhesive			

Section - IV

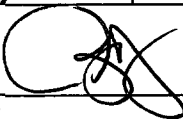
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).

Name Kim Davis	Title Consultant/Agent	Telephone No. (Include Area Code) 970.353.0511 kim@regwest.com
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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 Consultant/Agent
4. Typed Name Kim Davis	5. Date September 8, 2010

Label Revision Notification



September 8, 2010

Ms. Velma Noble, Product Manager 31
Document Processing Desk - **NOTIF**
Office of Pesticide Programs – **7504P**
U.S. Environmental Protection Agency
One Potomac Yard (South Building), Room S-4900
2777 South Crystal Drive
Arlington, VA 22202

Dear Ms. Noble:

Subject: Grow More, Inc.
NAC 7
EPA Reg. No. 70908-1

On behalf of **Grow More, Inc.**, RegWest Company, LLC is submitting the attached documents in response to PR Notices 98-10 and 2007-4. RegWest Company will act as sole agent in this endeavor.

Attached are the following documents:

- 1. Application for Pesticide: Notification
- 2. One **Reference Label** (illustrating the label revisions)
- 3. Two **New Labels** (incorporating the revisions)

In addition to the PR Notices changes, we are deleting in certain "General" and replacing it with "Product" and making other minor refinements. Please refer to the *Reference Label* for an illustration of all revisions.

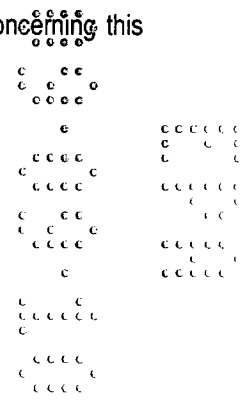
Please contact me at 970.353.0611 or kim@regwest.com if you have any questions or comments concerning this submission.

Regards,
RegWest Company, LLC

Kim Davis,
Consultant/Agent

Attachments

cc: GMI – Atwill, J.



NAC 7

CONCENTRATE

Cleaner Deodorizer
 Disinfectant Fungicide
 Sanitizer Mildewstat Virucide*

For Institutional and Industrial Use
 (Greenhouses, Kennels, Veterinary Establishments, Flower Shops, Pet Shops)

Also for Use as a Storage and Equipment Cleaner-Disinfectant

Effective in Hard Water up to 400 ppm Hardness
 (Calculated as CaCO₃ in the Presence of 5% Serum Contamination)

Active Ingredients:

Alkyl (C ₁₄ 50%, C ₁₂ 40%, C ₁₆ 10%)	
dimethyl benzyl ammonium chloride	8.680%
Octyl decyl dimethyl ammonium chloride	6.510%
Dioctyl dimethyl ammonium chloride	3.255%
Didecyl dimethyl ammonium chloride	3.255%
Other Ingredients	<u>78.300%</u>
Total	100.000%

Keep Out of Reach of Children

DANGER

See side panel for First Aid and additional Precautionary Statements.

EPA Reg. No. 70908-1 EPA Est. 70908-CA-1

Net Contents: 1 Gallon

{Side Panel}

First Aid

If on Skin or Clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes • Call a poison control center or doctor for treatment advice.
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 Swallowed:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor 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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.	

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes eye and skin damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed or absorbed through skin. Avoid contamination of food.

DIRECTIONS FOR USE

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

General Product Information

Cross contamination is of major housekeeping concern in institutions and industrial areas such as greenhouses, kennels, veterinary establishments, flower shops, pet shops, food storage buildings and farms. NAC 7 has been formulated to aid in the reduction of cross-contamination in these areas.

NAC 7 is a one-step disinfectant cleaner that when used as directed is effective against a broad spectrum of bacteria, is virucidal*, fungicidal and will prevent the growth of mold and mildew and their odors.

NAC 7 is an effective one-step sanitizer/cleaner for use on non-food contact surfaces. When used as directed, NAC 7 deodorizes surfaces in toilet areas, behind and under sinks and counters, garbage cans and garbage storage areas, and other places where bacterial growth can cause mal odors.

NAC 7 is a proven "one-step" disinfectant/cleaner/sanitizer/fungicide/bactericide/mildewstat/virucide* that is effective in water up to 400 ppm hardness in the presence of 5% serum contamination.

Apply NAC 7 to walls, floors and other hard (inanimate) non-porous surfaces such as empty fruit and vegetable storages, benches, cutters, farm machinery, other non-food surfaces, tables, tools, chairs, pots, counter tops, sinks, tiles and porcelain.

General Product Directions for Sanitization and Disinfection

Prepare the use solution by mixing 0.5 fluid ounces in one gallon of water. For disinfection, treated surfaces must remain wet for 10 minutes; allow solution to dry on treated surfaces. A contact time of 1 minute is required for sanitization. Apply prepared solution by appropriate means, such as with a cloth, sponge, mop or chemical/mechanical spray device, or by immersion, so as to thoroughly wet all surfaces. For heavily soiled areas, a preliminary cleaning is required. Prepare a fresh solution daily or when used solution becomes visibly dirty.

Sanitization: For use in greenhouses, kennels, veterinary establishments, flower shops, pet shops. Use to sanitize walls, floors and other hard (inanimate) non-porous surfaces such as benches, tables, tools, chairs, pots, countertops, sinks, tiles and porcelain.

Disinfection: The activity of NAC 7 has been evaluated in the presence of 5% serum and 400 ppm hard water by the AOAC Use Dilution test and found to be effective against a broad spectrum of gram-negative and gram-positive organisms as represented by:

- | | |
|------------------------------------|-------------------------------|
| <i>Brevibacterium ammoniagenes</i> | <i>Salmonella typhi</i> |
| <i>Enterobacter aerogenes</i> | <i>Serratia marcescens</i> |
| <i>Escherichia coli</i> | <i>Shigella dysenteriae</i> |
| <i>Klebsiella pneumoniae</i> | <i>Staphylococcus aureus</i> |
| <i>Salmonella choleraesuis</i> | <i>Streptococcus pyogenes</i> |
| <i>Salmonella schottmuelleri</i> | <i>Streptococcus faecalis</i> |

Storage and Equipment Cleaning and Disinfection (Non-Food Use):

Disinfection of Empty Food Storage Buildings (such as but not limited to potato or fruit storages) and of Handling Equipment (such as, but not limited to, conveyors and seed cutters): Thoroughly clean surfaces to be treated.

Disinfection of Machinery (such as, but not limited to, farm machinery before transferring to another field or farm): Prior to treatment, thoroughly wash machinery with a pressure washer and allow to dry.

Fungicidal Performance: NAC 7 is an effective fungicide against *Trichophyton mentagrophytes* (the athlete's foot fungus) when used on surfaces in areas such as locker rooms, dressing rooms, shower and bath areas and exercise facilities. Allow solution to dry on treated surfaces.

Mold and Mildew Control: NAC 7 effectively inhibits the growth of mold and mildew and the odors caused by them when applied to hard non-porous surfaces (as indicated in the General Product Information section). Allow solution to dry on treated surfaces and repeat when mold and/or mildew growth returns.

Virucidal* Performance: NAC 7 was evaluated in the presence of 5% serum and 400 ppm hard water and found to be effective against the following viruses: *Influenza A/Brazil, *Herpes Simplex virus Type _____ and *Vaccinia virus on inanimate non-porous environmental surfaces. Allow solution to dry on treated surfaces.

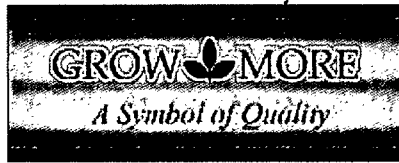
Storage & Disposal

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

Pesticide Storage: Store in original container in a cool, dry (preferably locked) area inaccessible to children and domestic animals. Do not reuse empty container. **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:** Non-refillable container; do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times, then offer for recycling, if available; or reconditioning, if appropriate; 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.

{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}

Manufactured by:



Grow More, Inc.

Research & Manufacturing For Over 70 Years
15600 New Century Drive, Gardena, CA 90248
Tel. (310) 515-1700 Fax (310) 515-5811

[] Denotes alternate/optional verbiage

{ } Denotes verbiage not printed on market labeling