



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 23, 2017

Kim Davis
Consultant/Agent
Grow More, Inc.
c/o RegWest Company, LLC
8203 West 20th Street, Suite A
Greeley, CO 80634-4696

Subject: PRIA Label and CSF Amendment – Adding new organisms and efficacy claims to the label, updating Product Chemistry Data
Product Name: NAC 7
EPA Registration Number: 70908-1
Application Date: December 15, 2016
Decision Number: 524557

Dear Ms. Davis:

The amended label and CSF(s) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. . You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 02/06/2015
- Alternate CSF A dated 02/06/2015

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the

website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Emilia Oiguenblik by phone at 703 347 0199, or via email at Oiguenblik.emilia@epa.gov or Eric Miederhoff by phone at 703 347 8028, or via email at Miederhoff.eric@epa.gov.

Sincerely,



Eric Miederhoff
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure: Stamped label, Chemistry Review, Efficacy Review

NAC 7

{ABN: Naccosan}

{Select Marketing Claims from the *Marketing Claims* section below}

Active Ingredients:

Alkyl (50% C ₁₄ , 40% C ₁₂ , 10% C ₁₆)	
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**

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. • Immediately rinse skin 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"> • 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.
If Inhaled:	<ul style="list-style-type: none"> • 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 poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the poison control center at 1-800-222-1222 for emergency medical information. Call CHEMTREC at 1-800-424-9300 for transportation incidents information.

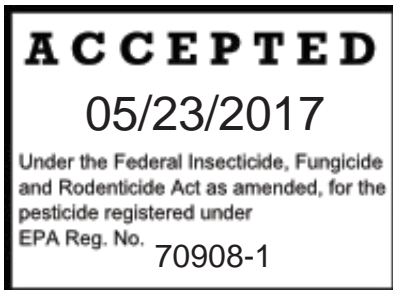
Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

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

See side panel for additional Precautionary Statements.

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

Net Contents: 1 Gallon



{Side Panel}

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes eye damage and skin burns. Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist. Do not get in eyes, on skin or on clothing. Thoroughly wash with soap and water after handling and before eating drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment ("PPE")

Wear goggles or face shield, rubber gloves, long-sleeved shirt, long pants, socks and shoes when handling this product. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should: Immediately remove clothing/PPE if pesticide gets inside; then thoroughly wash and put on clean clothing. Immediately remove PPE after handling this product. Wash the outside of gloves before removing. As soon as possible, thoroughly wash and change into clean clothing.

DIRECTIONS FOR USE

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

Product Information

Cross contamination is of major housekeeping concern in 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 on treated hard, non-porous surfaces.

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

NAC 7 is an effective sanitizer/cleaner for use on hard, non-porous, 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 disinfectant/cleaner/sanitizer/fungicide/bactericide/mildewstat/virucide*.

Apply NAC 7 to hard, non-porous walls, floors and other hard, 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.

NAC 7 is not for use on medical devices and equipment. Do not use to disinfect appliances, refrigerator interiors and microwave oven interiors. Do not use on dishes, glasses and utensils.

Product Directions for Sanitization and Disinfection

A preliminary cleaning is required prior to disinfection or sanitization; ensure all surfaces to be treated are free of all filth and/or soil. Prepare the use solution by mixing 0.5 fluid ounce in one gallon of water. 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. Prepare a fresh solution daily or when used solution becomes visibly dirty.

Sanitization: Treated surfaces must remain wet for 1 minute prior to wiping. For use on hard, non-porous, non-food contact surfaces in greenhouses, kennels, veterinary establishments, flower shops, pet shops. Use to sanitize hard,

non-porous walls, floors and other hard, non-porous surfaces such as benches, tables, tools, chairs, pots, countertops, sinks, tiles and porcelain.

Disinfection: Treated surfaces must remain wet for 10 minutes; allow solution to dry on treated surfaces. After disinfection a potable water rinse is required. The activity of NAC 7 has been evaluated 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>Aspergillus brasiliensis</i> [ATCC 6275]	<i>Salmonella schottmuelleri</i> [ATCC 8759]
<i>Enterobacter aerogenes</i> [ATCC 13048]	<i>Salmonella typhi</i> [ATCC 6539]
<i>Escherichia coli</i> [ATCC 11229]	<i>Serratia marcescens</i> [ATCC 43861]
<i>Erwinia amylovora</i> [ATCC 14976]	<i>Shigella dysenteriae</i> [ATCC 9361]
<i>Klebsiella pneumoniae</i> [ATCC 13883]	<i>Staphylococcus aureus</i> [ATCC 6538]
<i>Pseudomonas syringae</i> [ATCC 12271]	<i>Streptococcus pyogenes</i> [ATCC 19615]
<i>Salmonella enterica</i> [ATCC 10708]	<i>Trichophyton interdigitale</i> [ATCC 19615]

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): Prior to treatment, 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 interdigitale* (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 **Product Information** section). Allow solution to dry on treated surfaces and repeat treatment 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, *Influenza A/H1N1, *Influenza A/H5N1, *Herpes Simplex virus Types 1 and 2 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. **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 Handling:** Non-refillable container; do not reuse or refill this container. Promptly triple rinse (or equivalent) container 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 1/4 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 dispose of in a sanitary landfill.

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

{Marketing Claims}

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

{End of Marketing Claims}

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