UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1677-19

10/06/2003

page 177

October 6, 2003

Brian C. Brosdahl Ecolab Inc. Ecolab Center 370 N. Wabasha Street St. Paul, MN 55102-1390

Subject:

Mikro-Chlor

EPA Registration No. 1677-19 Application Dated: July 11, 2003 Receipt Dated: July 15, 2003

Revise the Ingredient statement as follows:

Dear Mr. Brosdahl:

This is a re-submission in response to an Agency deficiency letter dated May 19, 2003.

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

Conditions

	Active Ingredient: Sodium Hypochlorite
	Other Ingredients
2.	Revise the First Aid statement under the Hotline Section to include "Have the product container or label with you when calling a poison control center or doctor, or going for treatment."
<i>3</i> .	Add the phrase "This product is toxic to fish and aquatic organisms" to the Environmental Hazards statement.

CONCURRENCES									
SYMBOL	7510C								
SURNAME	MITCHELL			ļ				1	
	10-6-03								
EPA Form	1320-1A (1/90)						OFFICE	AL FILE COPY	

Printed on Recycled Paper

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Mitchell at (703) 308-6345.

Sincerely,

Robert S. Brennis

Product Manager - Team 32

Regulatory Management Branch II

Antimicrobials Division (7510C)

Mikro-Chlor

Formula X-3
Chlorine Releasing Sanitizer

ACCEPTED with COMMENTS EPA Letter Dated:

OCT - 6 2003

Cleans • Sanitizes • Bleaches • Deodorizes Under the Federal Insecticide,

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. /677-/

Active Ingredients:

Sodium Hypochlorite	3.25%
Inert Ingredients:	
Total:	

DANGER

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE. May cause severe skin and eye irritation or chemical burns to broken skin. Causes eye damage. Wear safety glasses or goggles and rubber gloves when handling this product. Wash after handling. Avoid breathing vapors. Vacate poorly ventilated areas as soon as possible. Do not return until odors have dissipated.

FIRST AID:

IF 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 SWALLOWED: Call a poison control center or doctor for treatment advice. Have a 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.

IF ON SKIN OR CLOTHING: 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.

FOR EMERGENCY MEDICAL INFORMATION, CALL TOLL-FREE 1-800-328-0026 OUTSIDE NORTH AMERICA, CALL 1-651-222-5352

ENVIRONMENTAL HAZARDS (50 pounds or greater): This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS:

Strong Oxidizing Agent: Mix only with water according to label instructions. Mixing this product with chemicals (e.g. ammonia, acids, detergents, etc.) or organic matter (e.g. urine, feces, etc.) will release chlorine gas, which is irritating to eyes, lungs and mucous membranes.

FOR INDUSTRIAL USE ONLY DO NOT MIX WITH ANYTHING BUT WATER

Mikro-Chior is a general purpose sanitizer and detergent possessing excellent cleaning and sanitizing properties. The alkaline detergent in Mikro-Chlor is fortified by the chemical action of the chlorine releasing sodium hypochlorite to increase and improve the removal of soils from all types of food preparation equipment. Mikro-Chlor is an excellent product for controlling bacteria, yeasts and molds, which cause contamination and spoilage of food.

07/11/03

DIRECTIONS FOR USE

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

SANITIZING DIRECTIONS

Food & Drinking Utensils, Other Food Contact Surfaces:

- 1. Scrape and preflush utensils to remove excess soils.
- Wash with a good detergent or compatible cleaner, Mikro-Chlor at 1 oz (28.3 g)/1 gal. (3.7 L) may be used.
- 3. Rinse with clear water.
- 4. Sanitize in a solution of 1 1/2 oz (42.5 g) of *Mikro-Chlor* to 2 gal. (7.6 L) of water (yields not more than 200 ppm available chlorine). Immerse all utensils for at least 1 minute.
- 5. Drain and air dry.

Use a suitable chlorine test kit to check the solution frequently. Change the solution as needed to prevent the concentration from falling below 100 ppm available chlorine at any time.

Other Food Contact Surfaces:

Food Service - Meat Blocks, Grinders, Saws, Sinks, Deep Fat Fryers, Steam Kettles, Inside of Refrigerators, Coffee Makers, Inside of Freezers
Bakery - Proof Boxes, Bakery Tables, Bread Cake Pans, Mixers

Vegetable Washing: Removes soil, bacteria, yeasts and molds from fresh vegetables. Washed vegetables are less subject to wilting and spoilage in handling and storage. Prepare a solution of 1/4 oz (7.1 g) of *Mikro-Chlor* per 2 1/2 gal. (9.5 L) of cool (80° - 100° F) water (25 ppm available chlorine). Submerge vegetables in solution. Rinse Thoroughly with flowing tap water.

Application by Pressure Spray: Prepare a solution of 1 1/2 oz (42.5 g) of *Mikro-Chior* per 2 gal. (7.6 L) of water (yields not more than 200 ppm available chlorine). Clean equipment. Spray with sanitizing solution. Drain and air dry.

Food Egg Sanitization: Thoroughly clean all eggs. Thoroughly mix 1 1/2 oz (42.5 g) of this product with 2 gal. (7.6 L) of warm water (yields not more than 200 ppm available chlorine). The sanitizer temperature should not exceed 130° F. Spray the warm sanitizer so that the eggs are thoroughly wetted. Allow the eggs to thoroughly dry before casing or breaking. Do not apply a potable water rinse. The solution should not be reused to sanitize eggs.

General Hard Surface Sanitizing (Non-Food Contact): Clean all surfaces and rinse off detergent with clean water. Sanitize non-food contact surfaces by immersion, wiping, or spraying with a solution of 1 1/2 oz. (42.5 g) of *Mikro-Chlor* per 2 gal. (7.6 L) of water. The solution yields not more than 200 ppm available chlorine. All surfaces should be exposed to the sanitizing solution for a period of not less than 5 minutes. Drain thoroughly and allow to air dry. No rinse is necessary.

Non-Food Contact Surfaces: Garage Cans, Outside of Refrigerators, Outside of Freezers, Ovens, Ceramic Tiles, Disposal Area Surfaces, Refuse Room Surfaces, Walls and Floors.

Consult your local department of health for local requirements. For specific use instructions additional information and assistance on your sanitation program, consult your local Ecolab Specialist.

STORAGE & DISPOSAL

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

Pesticide Storage: Product should be stored in a dry location.

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. If spilled, sweep up solid material, wrap and put in trash. Rinse away remaining residue.

Container disposal:

(325 lb fiber drum) - Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by . . * incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, disposed of in the same manner.

(Plastic, 5 gal. or greater) - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

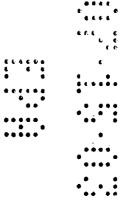
Mikro-Chlor Label Page 3 07/11/03 (Packets) - Do not reuse empty packet. Wrap packet and put in trash. (Container or Carton) - Do not reuse empty container (carton). Wrap container (carton) and put in trash.

Authorized by USDA for use in Federally Inspected Meat and Poultry Plants.

For service or additional information, call 1-800-35-CLEAN (352-5326)

Net Contents: 325 U.S. lbs (147.5 kg) 2 U.S. lbs (907 g) 1.0 oz packet (28.3 g) 1.5 oz. packet (42.5 g) 1.9 oz. packet (53.9 g) 4 oz. packet (113.4 a)

Ecolab Inc., Institutional Division 370 N. Wabasha Street St. Paul, MN 55102-1390 U.S.A. EPA Reg. No. 1677-19
EPA Est.: 1677-IL-2 (J), 1677-NJ-1 (W), 1677-TX-1 (D), 1677-GA-1 (M), 1677-CA-1 (S), 1677-MN-1 (P), 1677-PR-1 (B), 11321-CA-1 (C), 1677-OH-1 (H), 1677-CA-2 (R), 1677-MO-1 (K), 1677-WV-1(V)
Superscript refers to first letter of date code



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Alternate Directions for Use (1 oz packet)

DIRECTIONS FOR USE

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

Food & Drinking Utensils, Other Food Contact Surfaces:

- 1. Scrape and preflush utensils to remove excess soils.
- 2. Wash with a good detergent or compatible cleaner, *Mikro-Chlor* at 1 oz (28.3 g)/1 gal. (3.7 L) may be used.
- 3. Rinse with clear water.
- 4. Sanitize in a solution of 1 packet (1 oz./28.3 g) to 1.3 gal. (4.9 L) of water (yields not more than 200 ppm available chlorine). Immerse all utensils for at least 1 minute.
- 5. Drain and air dry.

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Use a suitable chlorine test kit to check the solution frequently. Change the solution as needed to prevent the concentration from falling below 100 ppm available chlorine at any time.

Other Food Contact Surfaces:

Food Service - Meat Blocks, Grinders, Saws, Sinks, Deep Fat Fryers, Steam Kettles, Inside of Refrigerators, Coffee Makers, Inside of Freezers
Bakery - Proof Boxes, Bakery Tables, Bread Cake Pans, Mixers

Vegetable Washing: Removes soil, bacteria, yeasts and molds from fresh vegetables. Washed vegetables are less subject to wilting and spoilage in handling and storage. Prepare a solution of 1 packet (1 oz./28.3 g) of *Mikro-Chlor* per 10 gal. (37.8 L) of cool (80° - 100° F) water (25 ppm available chlorine). Submerge vegetables in solution. Rinse thoroughly with flowing tap water.

Application by Pressure Spray: Prepare a solution of 1 packet (1 oz./28.3 g) to 1.3 gal. (4.9 L) of water (yields not more than 200 ppm available chlorine). Clean equipment. Spray with sanitizing solution. Drain and air dry.

Food Egg Sanitization: Thoroughly clean all eggs. Thoroughly mix 1 packet (1 oz./28.3 g) of this product with 1.3 gal. (4.9 L) of warm water (yields not more than 200 ppm available chlorine). The sanitizer temperature should not exceed 130° F (54.4 C). Spray the warm sanitizer so that the eggs are thoroughly wetted. Allow the eggs to thoroughly dry before casing or breaking. Do not apply a potable water rinse. The solution should not be reused to sanitize eggs.

General Hard Surface Sanitizing (Non-Food Contact): Clean all surfaces and rinse off detergent with clean water. Sanitize non-food contact surfaces by immersion, wiping, or spraying with a solution of 1 packet (1 oz./28.3 g) to 1.3 gal. (4.9 L) of water. The solution yields not more than 200 ppm available chlorine. All surfaces should be exposed to the sanitizing solution for a period of not less than 5 minutes. Drain thoroughly and allow to air dry. No rinse is necessary.

Non-Food Contact Surfaces: Garage Cans, Outside of Refrigerators, Outside of Freezers, Ovens, Ceramic Tiles, Disposal Area Surfaces, Refuse Room Surfaces, Walls and Floors.

Alternate Directions for Use (1.9 oz packet)

DIRECTIONS FOR USE

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

Food & Drinking Utensils, Other Food Contact Surfaces:

- 1. Scrape and preflush utensils to remove excess soils.
- 2. Wash with a good detergent or compatible cleaner, Mikro-Chlor at 1 oz (28.3 g)/1, gal. (3.7 L) may be used.
- 3. Rinse with clear water.
- 4. Sanitize in a solution of 1 packet (1.9 oz./53.9 g) to 2.5 gal. (9.5 L) of water (yields not more than 200 ppm available chlorine). Immerse all utensils for at least 1 minute.
- 5. Drain and air dry.

Use a suitable chlorine test kit to check the solution frequently. Change the solution as needed to prevent the concentration from falling below 100 ppm available chlorine at any time.

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Other Food Contact Surfaces:

Food Service - Meat Blocks, Grinders, Saws, Sinks, Deep Fat Fryers, Steam Kettles, Inside of Refrigerators, Coffee Makers, Inside of Freezers
Bakery - Proof Boxes, Bakery Tables, Bread Cake Pans, Mixers

Alternate Directions for Use (4 oz packet)

DIRECTIONS FOR USE

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

Food & Drinking Utensils, Other Food Contact Surfaces:

- 1. Scrape and preflush utensils to remove excess soils.
- 2. Wash with a good detergent or compatible cleaner, *Mikro-Chlor* at 1 oz (28.3 g)/1 gal. (3.7 L) may be used.
- 3. Rinse with clear water.
- 4. Sanitize in a solution of 1 packet (4 oz./113.4 g) to 5.3 gal. (20.1 L) of water (yields not more than 200 ppm available chlorine). Immerse all utensils for at least 1 minute.
- 5. Drain and air dry.

Use a suitable chlorine test kit to check the solution frequently. Change the solution as needed to prevent the concentration from falling below 100 ppm available chlorine at any time.

Other Food Contact Surfaces:

Food Service - Meat Blocks, Grinders, Saws, Sinks, Deep Fat Fryers, Steam Kettles, Inside of Refrigerators, Coffee Makers, Inside of Freezers
Bakery – Proof Boxes, Bakery Tables, Bread Cake Pans, Mixers

Vegetable Washing: Removes soil, bacteria, yeasts and molds from fresh vegetables. Washed vegetables are less subject to wilting and spoilage in handling and storage. Prepare a solution of 1 packet (4 oz./113.4 g) of *Mikro-Chlor* per 40 gal. (151.4 L) of cool (80° - 100° F) water (25 ppm available chlorine). Submerge vegetables in solution. Rinse Thoroughly with flowing tap water.

Application by Pressure Spray: Prepare a solution of 1 packet (4 oz./113.4 g) to 5.3 gal. (20.1 L) of water (yields not more than 200 ppm available chlorine). Clean equipment. Spray with sanitizing solution. Drain and air dry.

Food Egg Sanitization: Thoroughly clean all eggs. Thoroughly mix 1 packet (4 oz./113.4 g) of this product with 5.3 gal. (20.1 L) of warm water (yields not more than 200 ppm available chlorine). The sanitizer temperature should not exceed 130° F (54.4 C). Spray the warm sanitizer so that the eggs are thoroughly wetted. Allow the eggs to thoroughly dry before casing or breaking. Do not apply a potable water rinse. The solution should not be reused to sanitize eggs.

General Hard Surface Sanitizing (Non-Food Contact): Clean all surfaces and rinse off detergent with clean water. Sanitize non-food contact surfaces by immersion, wiping, or spraying with a solution of 1 packet (4 oz./113.4 g) to 5.3 gal. (20.1 L) of water. The solution yields not more than 200 ppm available chlorine. All surfaces should be exposed to the sanitizing solution for a period of not less than 5 minutes. Drain thoroughly and allow to air dry. No rinse is necessary.

Non-Food Contact Surfaces: Garage Cans, Outside of Refrigerators, Outside of Freezers, Ovens, Ceramic Tiles, Disposal Area Surfaces, Refuse Room Surfaces, Walls and Floors.