February 4, 2003

Brian C. Brosdahl Manager, North American Registrations Ecolab Inc. 370 N. Wabasha Street St. Paul, MN 55102

Subject:

Mikroklene

EPA Registration No. 1677-22

Application Date: December 12, 2002 EPA Received Date: December 20, 2002

Dear Mr. Brosdahl:

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

Proposed Amendment

Update First Aid Statements, Storage and Disposal, and minor label changes

Conditions

Revise the label as follows:

Revise the Environmental Hazards Statement to read: 1.

ENVIRONMENTAL HAZARDS (5 gallons or greater)

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

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SURNAME	Strong								
DATE	2-4-03								
EDA From 1320-14 (1/20)									

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one(1) 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 me at 703-308-6422.

Sincerely,

Adam Heyward

Product Manager 34

Regulatory Management Branch II Antimicrobials Division (7510 C)

MIKROKLENE

FOOD CONTACT SURFACE SANITIZER-IODOPHOR-FOOD SERVICE SANITATION-DETERGENT-GERMICIDE-VIRUCIDE*-DEODORIZER-FOOD SERVICE SANITATION-HOSPITAL DISINFECTION PROGRAMS

Active Ingredients:

lodine*	2.00%
Phosphoric Acid	
Inert Ingredients**:	
Total:	100.00%

^{*}From Butoxypolypropoxypolyethoxyethanol-iodine complex

DANGER

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE: Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through the skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wear goggles or face shield. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS (5 gallons or greater)

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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 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.

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 INHALED: 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.

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

Have the 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 contrained at the use of gastric lavage with COMMENTS

EPA Letter Dated:

FEB - 4 2003

Under the Federal Insecticide,
Fungicide, and Rodendoido Flot as
amended, for the pesticido,
registered under FPA Ros. No. 1677-177

^{**} Active as cleaning and buffering agents

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DIRECTIONS FOR USE

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

Disinfection: Remove heavy soil or gross filth prior to disinfection step. To disinfect hard, surfaces use 2/3 oz. *Mikroklene* per gallon of tepid (75°-100°F) water (75 ppm titratable role). Apply with cloth, mop or *Mikro-Spray*. Allow surfaces to remain wet for 10 minutes then wipe dry. When amber color of solution fades noticeably, mix a fresh solution.

Virucidal*: Disinfects the following viruses on inanimate environment surfaces at the use dilution containing 2/3 oz. *Mikroklene* per gallon of water (75 ppm tit. I) with a 10 minute contact time:

Herpes simplex Type 1

Influenza A (PR-8)

Poliovirus, Type 1

Newcastle Disease

Vaccinia

Adenovirus, Type 3

Dilution Table

ppm titratable iodine	12 1/2	<u> 25</u>	<u>75</u>
oz. Mikroklene per 2 1/2 gallons water	1/4	1/2	1 1/2

NOTE: 1 oz.=2 tablespoonfuls or 6 teaspoonfuls

Directions for Sanitizing Food Contact Surfaces

Use to sanitize previously cleaned, hard, nonporous food contact surfaces. Use 1/2 oz. *Mikroklene* per 2 1/2 gallons of 75-100 deg. water for sanitizing (provides 25 ppm titratable iodine). No rinsing necessary. Renew solution daily or before amber color disappears. Not recommended for use on silver and silverplate. May cause blackening.

Sanitizing Eating, Drinking and Food Prep Utensils

- 1. Remove gross food particles by prescrape, preflush, and when necessary, a presoak treatment.
- 2. Wash in a solution of 1/2 oz. *Mikroklene* to 2 1/2 gallons of water (25 ppm titratable iodine) or other recommended detergent.
- Rinse with clean water.
- 4. Sanitize in a solution of 1/4 oz. *Mikroklene* to 2 1/2 gallons of water (12 1/2 ppm titratable iodine). Immerse all utensils for at least 1 minute or contact time specified by governing sanitary code. Renew solution before amber color disappears.
- 5. Drain and air dry.

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NOTE: For mechanical operations, the prepared use solution may not be re-used for sanitizing but may re-used for other purposes, such as cleaning. For manual operations a fresh sanitizing solution should be prepared at least daily or more often if solution becomes diluted or soiled.

As a sanitizer for previously cleaned hard non-porous surfaces at 25 ppm titratable iodine, this product is effective against *Vibrio chiolerae*.

When used at a concentration providing a minimum 12.5 ppm titratable lodine, *Mikroklene* had been tested and shown to be an effective sanitizer up to pH 7.5 in use solution.

Mikroklene is approved by the National Sanitation Foundation for use in spray and brush type glass washing machines. Keep reservoir full. Adjust control as directed by machine manufacturer and local health authorities.

When used as directed *Mikroklene* complies with FDA Regulation 21 CFR 178.1010(b)(4) for sanitizing solutions which are not to be rinsed from food contact surfaces. Consult local health department for additional information.

STORAGE & DISPOSAL

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

PESTICIDE STORAGE: Store only in original or properly marked container. Keep container closed between uses. If spilled, flush to drain with a large quantity of water.

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:

(1 gallon or less): Do not reuse container. Wrap container and put in trash.

(greater than 1 gallon): 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.

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MIKROKLENE Label

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Net Contents: 1 U.S. gallon (3.78 L) 5 U.S. quarts (4.725 L)

EPA Reg. No. 1677-22

EPA Est.: 1677-IL-2 (J), 1677-NJ-1 (W), 1677-TX-1 (D), 1677-CA-1 (S), 1677-MN-1 (P), 1677-PR-1 (B), 1677-OH-1 (H), 1677-CA-2 (R), 1677-NC-1 (N), 1677-MO-1 (K), 1677-WV-1 (V) Superscript refers to first letter of date code

Ecolab Inc., Institutional Division 370 Wabasha Street N. St. Paul, Minnesota 55102-1390

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