

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG - 4 1999

Ann M. Oxford
Ecolab Inc.
370 N. Wabasha Street
St. Paul, MN 55102

Dear Ms. Oxford:


Subject: Notification addition surface
K-San
EPA Registration No. 1677-56
Amendment application of July 20, 1999

This will acknowledge receipt of your notification, to add an additional surface for sanitizing (bar utensils), under the provisions of FIFRA section 3 (c) 9. Based on a review of the material, the following comment apply.

This application is acceptable and has been made a part of the records for this file.

If you have any question concerning this letter, please contact Portia Jenkins at (703) 308-6230.


Sincerely yours,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510W)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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

1. Company/Product Number <p style="text-align: center;">1677-56</p>	2. EPA Product Manager <p style="text-align: center;">Adam Heyward</p>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
3. Company/Product (Name) <p style="text-align: center;">K-San</p>	PM# <p style="text-align: center;">34</p>	
5. Name and Address of Applicant (Include ZIP Code) Ecolab Inc. 370 N. Wabasha Street St. Paul, MN 55102 <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

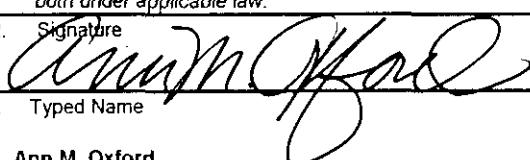
<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional Page(s) if necessary. (For section I and Section II)
 Notification of addition of indoor, non-food site and additional alternate packaging and related labeling statements per PR Notice 98-10. Bar utensils were added as an additional surface for sanitizing. The alternate packaging is for a packet and a tip & dose bottle. 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 the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per Container 1.5 ounces 12	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Package wgt. No. Per Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must submitted			
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 12/1.5 ounces packets, 2/32 ounce bottles, 1 gallon jug, 5 gallon pail, 55 gallon drum	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Other _____ <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application.)		
Name Ann M. Oxford	Title Manager, Regulatory Services	Telephone No. (Include Area Code) (651) 293-2848
Certification		6. Date Application Received (Stamped)
I certify that the statements which I have made on this form and all attachments 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.		
2. Signature 	3. Title Manager, Regulatory Services	
4. Typed Name Ann M. Oxford	5. Date July 20, 1999	

DANGER: Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through 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 before reuse.

EPA Reg. No. 1677-56

K-SAN

Acid Sanitizer

ACTIVE INGREDIENTS

Phosphoric Acid	22.00%
Sodium Dodecylbenzene sulfonate	2.75%
INERT INGREDIENTS:	75.25%

FOR AGRICULTURAL OR COMMERCIAL USE ONLY

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panel for additional precautions.

CONTAINS NOT MORE THAN 7.0% PHOSPHORUS, 1.15 GMS. PER GAL. OF AVERAGE RECOMMENDED USE CONCENTRATION.

DO NOT MIX WITH ANYTHING BUT WATER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush immediately with plenty of water while holding eyelids apart. Remove any contact lenses and continue flushing for 15 minutes. Call a poison control center or physician immediately.

IF ON SKIN: Remove contaminated clothing. Flush with plenty of water and wash effected area with mild soap and water. If symptoms persist, call a poison control center or physician.

IF SWALLOWED: Immediately rinse mouth out with water and give sips of water. **DO NOT INDUCE VOMITING.** Never give anything by mouth to an unconscious person. Call a poison control center or physician immediately.

IF INHALED: Remove victim to fresh air. If breathing becomes difficult or symptoms develop, call a poison control center or physician.

FOR EMERGENCY MEDICAL INFORMATION, CALL TOLL-FREE, 1-800-328-0026.

NET CONTENTS:

55 U.S. GALS.
(208.2 l)



ENVIRONMENTAL HAZARDS:

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 Systems (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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE:

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

Dairy and food processing equipment

1. Rinse equipment with clean lukewarm water immediately after use. Flush thoroughly to remove all loose material.
2. Brush-wash all surfaces with proper Klenzade detergent.
3. Rinse thoroughly with hot (145°F.) water.
4. Sanitize equipment prior to use. Use immersion, circulation or coarse spray techniques as appropriate. For sanitizing by immersion or circulation, use K-SAN at 1 ounce to 2 gallons of water. For coarse spray sanitizing, use K-SAN at 1 ounce to 1 gallon of water. All surfaces should be exposed to the sanitizer for at least one minute or contact time specified by governing sanitary code. Drain solution from equipment.

Institutional Applications

DISHES, GLASSES, UTENSILS AND EQUIPMENT

1. Remove gross food particles by a prescrape, preflush and when necessary a presoak treatment.
2. Wash with an appropriate detergent.
3. Rinse with clean water.
4. Sanitize in a solution of 1 oz. product to 2 gallons of water (100 ppm of sodium dodecylbenzene sulfonate). The sanitizer concentration can be verified with an appropriate test kit. Immerse all utensils for at least one minute or contact time specified by governing sanitary code.
5. Place sanitized items on rack or drainboard to air dry.

NOTE: FOR MECHANICAL OPERATIONS prepared use solutions may not be reused for sanitizing but may be reused for other purposes such as cleaning. FOR MANUAL OPERATIONS fresh sanitizing solution should be prepared at least daily or more often if solution becomes diluted or soiled.

This product conforms to 21 CFR 178.1010(b) (7).

STORAGE AND DISPOSAL:

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL

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.

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), 1677-OH-1 (H)

Superscript refers to first letter of date code.

Manufactured by:



FOOD & BEVERAGE DIVISION
Ecolab Inc.
370 Wabasha Street
St. Paul, MN 55102

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**ADDITIONAL INDOOR, NON-FOOD SITES AND ALTERNATE PACKAGING
AND RELATING LABELING NOTIFICATION PER PR NOTICE 98-10**

[K-SAN DIRECTIONS FOR TIP & DOSE BOTTLE]

SANITIZING GLASSWARE, BAR UTENSILS AND EQUIPMENT

Tip K-San bottle upside down to fill top reservoir. Stand bottle upright and allow excess product to drain back into bottom reservoir. Pour pre-measured product volume (1.5 oz.) into sink filled with 3 gallons of water (100 ppm sodium dodecylbenzene sulfonate). Sanitizer concentration can be verified with the K-San Test Kit.

1. Remove gross food particles from surfaces to be sanitized by a prescrape, preflush and when necessary a presoak treatment.
2. Wash with an appropriate detergent.
3. Rinse with clean water.
4. Sanitize surfaces in sink compartment by immersion for at least one minute or contact time specified by governing sanitary code.
5. Place sanitized items on rack or drainboard to air dry.

NOTE: FOR MANUAL OPERATIONS fresh sanitizing solution should be prepared at least daily or more often if solution becomes diluted or soiled.

[K-SAN – TEAR PACKET USE DIRECTIONS]

In three gallons of water, mix one 1.5 oz packet of sanitizer (100 ppm sodium dodecylbenzyne sulfonate). Sanitizer concentration can be verified with the K-San Test Kit.

- 1) Remove gross food particles from surfaces to be sanitized by a prescrape, preflush and when necessary a presoak treatment.
- 2) Wash with Bar Star Detergent.
- 3) Rinse with clean water.
- 4) Sanitize surfaces in sink compartment by immersion for at least one minute or contact time specified by governing sanitary code.
- 5) Place sanitized items on rack or drainboard to air dry.