

FEB 12 1998

Ann M. Oxford
Ecolab Inc.
Ecolab Center
St. Paul, MN 55102

Dear Ms. Oxford:

Subject: Reregistration Eligibility Decision Document for
pesticide case mineral acids
Mikroklene DF
EPA Registration No. 1677-58

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

Labeling Revisions

The following labeling revisions must be made:

Delete the virucidal, tuberculocidal and hospital disinfectant claims from the labeling. As part of the reregistration process of this product, you must submit the efficacy data support these claims.

Revise the precautionary statement as follows:

Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or adsorbed 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 clothing before reuse.~~

CONCURRENCES						
SYMBOL						
SURNAME						
DATE						

Revise the statements of practical treatment as follows:

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available. Drink large quantities of water. Avoid alcohol. If person is unconscious, do not give anything by mouth.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

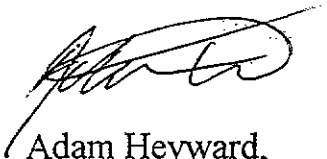
IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

Submit five copies of revised draft labeling with the following revisions.

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

Sincerely,



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

Enclosed



42465

EPA Reg. No. 1677-58

MIKROKLENE DF

ACTIVE INGREDIENTS:

Iodine* 2.00%
 Phosphoric acid 6.55%
 INERT INGREDIENTS: 91.45%

*From Butoxypolypropoxypolyethoxyethanol-iodine complex.

KEEP OUT OF REACH OF CHILDREN

DANGER

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER: CORROSIVE. CAUSES SEVERE EYE DAMAGE AND SKIN IRRITATION. 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. WASH THOROUGHLY WITH SOAP AND WATER AFTER HANDLING. AVOID CONTAMINATION OF FOOD.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

FEB 12 1998

Manufactured by:

KLENZADE, Division of Ecolab
Ecolab Center
St. 1 Minnesota 55102 ©, 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
intended, for the pesticide,
registered under EPA Reg. No.
1677-58

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush immediately with cool water. Remove contact lenses. Continue flushing for 15 minutes, holding eyelids apart. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF SWALLOWED: Drink promptly large quantities of water. Avoid alcohol. DO NOT induce vomiting. Never give anything by mouth to an unconscious person. CALL A POISON CONTROL CENTER OR PHYSICIAN IMMEDIATELY

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

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

CONTAINS NOT MORE THAN 2.4% PHOSPHORUS, 0.41 GMS. PER GAL. OF AVERAGE RECOMMENDED USE CONCENTRATION.

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 (E),
1677-PR-1 (B)

Superscript refers to first letter of date code.

NET CONTENTS:

55 U.S. ALS. (208.2

DIRECTIONS FOR USE

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

DIRECTIONS FOR SANITIZING DAIRY AND FOOD EQUIPMENT

FOR EQUIPMENT, TANKS, VATS, PAILS, PIPELINES AND CLOSED SYSTEMS - Remove gross food particles and soil by a preflush, or pre-scrape, and when necessary pre-soak treatment. After the equipment has been cleaned and rinsed, just prior to use, sanitize with MIKROKLENE DF at a concentration of 12.5 ppm titratable iodine for at least a two minute exposure time. Use immersion, spray or circulation techniques as appropriate to the equipment. Drain thoroughly. MIKROKLENE DF may be used as a final sanitizing rinse for returnable and non-returnable bottles at 6 ppm titratable iodine.

DIRECTIONS FOR SANITIZING POULTRY AND MEAT PROCESSING EQUIPMENT

FOR EQUIPMENT - after washing and rinsing equipment and just before use, sanitize with a MIKROKLENE DF concentration of 25 ppm titratable iodine for at least a two minute exposure period. Use immersion, spray or circulation techniques as appropriate to the equipment. Drain thoroughly.

FOR CONTINUOUS TREATMENT OF MEAT AND POULTRY CONVEYORS - wash, rinse, and sanitize conveyance equipment. During processing, apply MIKROKLENE DF at a 25 ppm titratable iodine level to conveyors with MIKRO MASTER feeding equipment. Controlled volumes of sanitizer are applied to return portion of conveyor through nozzles so located as to permit maximum drainage of sanitizer from equipment and to prevent puddles on top of belt. During interruptions in operation, spray equipment, peelers, collators, slicers and saws with MIKRO MASTER dispensed MIKROKLENE DF solution of 25 ppm titratable iodine. Conveyor equipment should be free of product when applying this spray.

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 solutions should be prepared at least daily or more often if the solution becomes diluted or soiled.

DIRECTIONS FOR VIRUS DISINFECTION

Disinfects the following viruses on inanimate, hard, non-porous surfaces (formica, stainless steel). Clean and rinse the surface. Wet surfaces thoroughly with MIKROKLENE DF solution containing 75 ppm titratable iodine. Use immersion, spray or circulation techniques as appropriate. Allow surface to remain wet for 10 minutes, then wipe dry or drain. For food contact surfaces, a potable water or sanitizing solution rinse is required. Prepare a fresh solution daily or when it becomes soiled or diluted.

<i>Herpes simplex, type 1</i>	<i>Influenza A2</i>	<i>Poliovirus</i>
<i>Newcastle Disease</i>	<i>Vaccinia</i>	<i>Adenovirus, type 3</i>

DILUTION TABLE

ppm titratable iodine	6	12.5	25	75
Oz. MIKROKLENE DF per 5 gallons of water	1/4	1/2	1	3

Use at recommended dilutions and at a temperature not exceeding 115°F. Keep from freezing.

STORAGE AND DISPOSAL

PESTICIDE DISPOSAL:

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

ENVIRONMENTAL HAZARDS: Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage plant authority. For guidance contact your State Water Board or Regional Office of the U.S. Environmental Protection Agency.