

FEB 28 1995

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

Subject: Mandate CIP Acid Sanitizer
EPA Registration No. 1677-90
Eight Month Response (Resubmission) to the Citric Acid
Reregistration Eligibility Document (RED)

Dear Ms. Oxford:

This is in response to your October 24, 1994 submission for reregistration of the subject product under the Citric Acid RED. Since the product cannot be reregistered until all requirements for it are satisfied under the Mineral Acids RED, this submission is being treated as a registration amendment.

The amendment referred to above - the revised product labeling and the revised Confidential Statement of Formula dated October 20, 1994 - submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy of the labeling is enclosed for your records.

1. Submit five copies of the finished labeling before the product is released for shipment bearing the amended labeling.
2. We note that the two statements under the product name read, "CIP ACID SANITIZER" and "For Dairy and Food Processing Equipment". (These statements are obscured and not reproducible on the draft copy.)

In regard to item 2 in your letter: as stated in the latest acute toxicity review (which was enclosed with our September 27, 1994 letter), particle size data have not been included in your waiver requests. An acute inhalation toxicity study is still required for the concentrate (the product as sold). In regard to

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CONCURRENCES

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labeling, the review indicates that precautionary labeling reflective of an acute inhalation category I rating may be submitted in lieu of an acute inhalation toxicity study. (This labeling may not include the word "Poison" but would include mention of a respiratory protective device.) Additional details in the review indicate that the registrant may conduct an acute inhalation study on the most concentrated use dilution in order to demonstrate that a respiratory device is not necessary for handling the diluted product. If this conclusion is borne out, applicators will be relieved of the respiratory protective device requirement; however, labeling for initial handlers or persons who dilute the product will still reflect toxicity category I for acute inhalation, and for them a respiratory protective device will be required. Note that these options are based on our general policy, and are not meant to suggest that we have concluded that the product would be placed in acute inhalation toxicity category I were an acceptable study available.

Any further reregistration-related acute toxicity reviews and comments by the Agency concerning the required acute oral and acute inhalation toxicity studies will be made in conjunction with the Mineral Acids RED. Correspondence regarding this product pursuant to the Citric Acid RED is now completed.

If you have any questions about this letter, please call Wallace Powell at 703-305-6938.

Sincerely,



Ruth G. Douglas
Product Manager (32)
Antimicrobial Program Branch
Registration Division (7505C)

Enclosure

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EPA Reg. No. 1677-90

MANDATE

PROCESSING EQUIPMENT

ACTIVE INGREDIENTS

Phosphoric Acid	23.8%
Citric Acid	20.0%
Octanoic Acid	6.0%
Decanoic Acid	2.0%
INERT INGREDIENTS	49.5%

U.S. Patent No. 4,404,040

FOR AGRICULTURAL OR COMMERCIAL USE ONLY

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panel for additional precautions.

K

EPA Est. 1677-IL-2 (J), 1677-NJ-1 (W),
1677-GA-1 (M), 1677-CA-1 (S),
1677-PR-1 (B)

Superscript refers to first letter of date code.

Manufactured by:

KLENZADE, Division of Ecolab Inc.
Ecolab Center
St. Paul, MN 55102, 1989

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN: Immediately flush skin with plenty of cool running water for at least 15 minutes. Get medical attention if irritation persists.

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

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

NET CONTENTS:

55 U.S. GALS. (208.2 l)

RECEIVED
1677-90
Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 1677-90
FEB 28 1995

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