UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 28 1997

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

Dear Ms. Oxford:

Subject: Trichlor-O-Cide XP-160 EPA Registration No. 1677-91 Your Amendment Dated September 24, 1996

This is in response to your amendment of revised labeling with added "Directions For Use" for the subject product.

The labeling referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable subject to the following comment.

Revise the "Environmental Hazards" statement to read:

"This pesticide is toxic to fish and aquatic organisms. 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 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 sewage treatment plant authority. For quidance contact your State Water Board or Regional Office of the EPA.

A stamped copy is enclosed for your records. Submit one copy of the final printed label.

CONCURRENCES							
SYMBOL							
SURNAME		*************		***********			
DATE				******************		*************	

EPA Form 1320-1A (1/90)

Printed on Recycled Paper

If you have any questions, please call Marianne Clark at (703) 308-6381.

Sincerely yours

Robert S. Brennis

Acting Product Manager (32) Antimicrobial Program Branch Registration Division (7504C)

TRICHLOR-O-CIDE XP-160

POWDERED SANITIZER

Active Ingredient: Sodium dichloro-s-triazinetrione dihydrate (providing a minimum of 15% available chlorine)27.3% Inert Ingredients Formula contains no phosphorus. in EPA Letter Dated:

KEEP OUT OF REACH OF CHILDREN DANGER

See additional precautions on side panel or outer case label.

AFR 48 1001

Under the Federal Insecticide, Fungicide, and Rederificide Act as amended, for the posticide registered under EPA Reg. No. /6

STATEMENT OF PRACTICAL TREATMENT

If in Eyes: Hold eyelids open and flush with a steady gentle stream of water for 15 minutes. Get medical attention.

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 preferable mouth-to-mouth. Get medical attention.

If Swallowed: Drink promptly large quantities of water. Avoid alcohol. Get medical attention.

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

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

EPA Reg. No. 1677-91

EPA Est.

1677-IL-2 (J), 1677-NJ-1 (W), 1677-TX-1 (D), 1677-GA-1 (M), 1677-MN-1 (P), 1677-CA-1 (S), 1677-PR-1 (B), 1677-IL-3 (F), 1677-OH-1 (H)

The superscript refers to the first letter of the date code.

Net Contents:

425 U.S. lbs (192.8 kg)

100 U.S. lbs (45.4 kg)

of XX oz. packets

Ecolab Inc. **Ecolab Center** St. Paul, MN 55102

[The precautionary statements, environmental hazards (if applicable to package size) and physical of chemical hazards may be placed on the outer case (shipping container) for alternate package sizes in

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE: Causes irreversible eye damage. Causes skin irritation. Harmful if swallowed inhaled or absorbed through skin. Do not get in eyes, on skin or on clothing. Wear goggles, face shield or safety glasses. Wash thoroughly after handling. Remove contaminated clothing and wash before reuse.

PHYSICAL OR CHEMICAL HAZARDS: Strong oxidizing agent. Do not mix with acids, will cause hazardous vapors. Mix only with water according to label directions. Do not store or use in a manner that would contaminate food or feed.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. 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 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.

Trichlor-O-Cide XP-160 Sepember 23, 1996 Page 2

DIRECTIONS FOR USE

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

DAIRY, BEVERAGE AND FOOD PROCESSING PLANTS:

Remove gross food particles and soil by a pre-flush, or pre-scrape and, when necessary, presoak the surface(s) to be sanitized. Clean utensils and equipment thoroughly with an appropriate detergent and rinse with potable water. Before use, sanitize these items with a 100 ppm available chlorine (1 oz. per 12 gallons) solution of TRICHLOR-O-CIDE XP-160 for a two minute exposure period. Use immersion, spray or circulation techniques as appropriate to the equipment. Allow to drain thoroughly and air dry. Note: DO NOT SOAK OVERNIGHT.

BACTERIOPHAGE CONTROL: Trichlor-O-Cide XP-160 will significantly reduce the incidence of Streptococcus cremoris and S. diacetilactis bacteriophage in cheese manufacturing establishments by fogging at concentrations of 600 ppm available chlorine. Fogging should be used as a supplement to acceptable manual cleaning and sanitizing of room surfaces as described above.

packaging materials must be removed from the room or carefully protected. Fog desired areas using one quart per 1000 cubic feet of room area with a Trichlor-O-Cide XP-160 solution containing 600 ppm available chlorine (1 oz to 2 gal). Vacate the areas of all for a minimum of 2 hours after fogging. All food contact surfaces must then be thoroughly rinsed with a 200 ppm solution of available chlorine. Allow surfaces to drain thoroughly before operations are resumed.

[ALTERNATE PACKAGE SIZE DIRECTIONS FOR USE]

FOR KITCHEN UTENSILS AND OTHER HARD NONPOROUS FOOD CONTACT SURFACES

This product is recommended for use on hard, non-porous surfaces such as dishes, glasses, or food processing equipment or utensils.

Sink Sanitizing of Kitchen Utensils and Equipment

- Scrape and pre-rinse utensils to remove excess soils.
- 2. Wash with a detergent in the first compartment sink.
- 3. Rinse with clean water in second compartment.
- 4. To sanitize in third compartment, dissolve 1 ounce per 12 gallons [alternate directions: dissolve 1 packet (0.208 oz) in 3 gallons] of lukewarm, 75-95°F (24-35°C) water (yields 100 ppm available chlorine). Immerse all utensils or equipment for at least one minute. Allow to drain thoroughly and air dry.

Sink Sanitizing of Kitchen Utensils and Equipment

- Scrape and pre-rinse utensils to remove excess soils.
- 2. Wash with a detergent.
- Rinse with clean water.
- 4. To sanitize, dissolve 1 packet (0.104 oz.) in 5 quarts [(0.208 oz.) in 3 gallons or (0.417 oz.) in 5 gallons or (2.08 oz.) in 25 gallons] of lukewarm, 75-95°F (24-35°C) water (yields 100 ppm available chlorine). Immerse all utensils or equipment for at least one minute. Allow to drain thoroughly and air dry.

ACCEPTED
with COMMENTS
in EPA Letter Entode

APR 28 1997

Under the Federal Insections, Fungish and Polici II. Action amendal, for the restroide registered under E2a Reg. No. 1679-9/ Trichlor-O-Cide XP-160 label September 23, 1996

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Stationary Equipment and Other Food Contact Surfaces

To sanitize stationary equipment and other food contact surfaces, dip a clean wipe cloth into a bucket filled with sanitizing solution and sanitize surfaces, or apply sanitizing solution dispensed from a spray bottle onto a clean cloth or sponge. Wipe surface making sure to completely cover surface for at least 60 seconds. Allow to drain and air dry.

Use a suitable chlorine test kit to check solution frequently. Change the solution as needed to prevent concentration form falling below 50 ppm available chlorine at any time.

NOTE: FOR MECHANICAL OPERATIONS prepared use solution 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.

FOOD SHELL EGG SANITIZATION

Only clean, whole eggs can be used for sanitizing. Dirty, cooked, or punctured eggs cannot be used. Thoroughly mix 1 oz. of this product with 12 gallons of warm water to provide a 100 ppm available chlorine solution. The sanitizer temperature should not exceed 130 deg F. Spray the warm sanitizer so that the eggs are thoroughly dry before casing or breaking. Do not apply a potable water rinse. The solution should not be reused to sanitize eggs.

STORAGE & DISPOSAL (425 lb fiber drum and 100 lb bag in a box)

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

<u>Pesticide disposal</u>: 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.

<u>Container disposal</u>: 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 inceration if allowed by state and local authorities. If drum is contaminated and cannot be reused, disposed of in the same manner.

STORAGE & DISPOSAL (packets)

Do not reuse empty packet. Wrap packet and put in trash.

STORAGE & DISPOSAL (plastic tub)

Store in a dry place. Do not reuse empty container. If spilled, sweep up solid material, wrap and put in trash. Rinse away remaining residue.

For more information or technical assistance, call toll-free 1-800-35-CLEAN (352-5326).

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1699-91