

1677-95

2/6/2003

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 6, 2003

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

Subject: **Mandate II**
EPA Registration No. 1677-95
Application dated December 17, 2002

Dear Mr. Brosdahl:

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

Proposed Amendments

- Revised label per PR Notices 2001-1
- Revised Storage and Disposal statements
- Revised Physical and Chemical Hazards statement

Label Comments

1. Add **Pesticide Storage** language to the Storage and Disposal section:

Storage and Disposal

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

Pesticide Storage: (You must add your own text.)

Per PR Notice 83-3

2. Delete the "s" on Active Ingredient


General Comments

Submit three (3) copies of your final printed label before you release the product for shipment bearing the amended label.

A stamped copy is enclosed for your records.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,



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

Enclosure

3/4

MANDATE II

CIP Acid Sanitizer For Dairy & Food Processing Equipment

ACTIVE INGREDIENTS:

Phosphoric Acid 26.25%

INERT INGREDIENTS: 73.75%

TOTAL: 100.00%

KEEP OUT OF REACH OF CHILDREN DANGER

FOR AGRICULTURAL OR COMMERCIAL USE ONLY

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 contaminated clothing before reuse.

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 contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS: (5 gallons or greater)

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 guidance contact your State Water Board or Regional Office of the U.S. Environmental Protection Agency.

PHYSICAL AND CHEMICAL HAZARDS: Strong oxidizing agent. Mix only with water according to label directions. Mixing with chlorinated detergents may release hazardous gases irritating to eyes, lungs and mucous membranes.

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

FEB - 6 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1677-95

DIRECTIONS FOR USE

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

For Dairy and Food Processing Equipment, Tanks, Vats, Pails, Pipelines and Closed Systems-

Clean all surfaces thoroughly with proper detergent and rinse with water. Prior to use, sanitize equipment with 1 ounce *Mandate II* to 6 gallons of water. Use immersion, circulation or coarse spray techniques as appropriate. All surfaces should be exposed to the sanitizing solution for at least 1 minute or contact time specified by governing sanitary code. Drain thoroughly. Continued use of *Mandate II* at 1 ounce to 6 gallons of water will prevent the formation of milkstone or mineralstone on processing equipment.

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.

STORAGE & 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:

(1 gallon or less): Do not reuse empty containers. 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 a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

(Tote): Verify that the tote is empty. Do not rinse or clean. Seal tote and contact Ecolab for return.

Net Contents:

1 U.S. gal (3.78 L)
5 U.S. gal (18.9 L)
15 U.S. gal (56.7 L)
55 U.S. gal (208.2 L)
300 U.S. gal (1,134 L)

EPA Reg. No. 1677-95

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), 3798-CA-2 (T), 37982-CA-3 (A), 11321-CA-1 (C), 1677-OH-1 (H), 1677-CA-2 (R), 1677-MO-1 (K), 1677-WV-1 (V), 303-IN-1 (L)

Superscript refers to first letter of date code

Ecolab Food & Beverage Division
Ecolab Inc., 370 Wabasha Street N.
St. Paul, Minnesota 55102-1390 U.S.A