

PM 32

1677-100

173

FEB 0 1989

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

Attention: Ann M. Oxford

Gentlemen:

Subject: Institutional Scrub Free
EPA Registration No. 1677-100
Your Submission Dated January 25, 1988
EPA Received Date January 28, 1988

The submitted data meet the requirements to support effectiveness of the product as a virucide against HIV-1 (AIDS virus) on hard, non-porous surfaces in the presence of a moderate amount of organic soil (10% blood serum) when used at a 1/2 dilution for a contact time of 2 minutes at room temperature (20 to 25 °C).

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, is accepted provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling.
 - a. Change claim "B" to read "Institutional Scrub Free has been found effective against Human Immunodeficiency Virus Type 1 (commonly known as the AIDS virus) on inanimate surfaces when tested according to the EPA virucidal testing requirements."
 - b. The labeling requirements for antimicrobial pesticides used on hard surfaces against HIV-1 (AIDS virus) are indicated on the enclosure. It is important to note that featured statements/phrases, emphasized/enlarged lettering, special graphics, or any product name that employs the term "AIDS" are not acceptable, as indicated in item 2. Special instructions for this use pattern must be provided in the format indicated in item 4 of this enclosure.

56610:I/C:Dutch:K-14:KENCO:1/6/88:1/19/89:SG:vo:jh:rw

CONCURRENCES

SYMBOL	75-7610						
SURNAME	Dutch						
DATE	3-6-89						

-2-

Submit five (5) copies of your final printed labeling before you release the product for shipment. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Should you have any further questions, please contact Veronica Dutch at (703) 557-6938.

Sincerely yours,

Jeff Keapler
Product Manager (32)
Antimicrobial Program Branch
Registration Division (TS-767C)

Enclosures

Institutional Scrub Free

Heavy Duty

Bathroom Cleaner/Disinfectant

One Step Cleaner • Disinfectant • Sanitizer • Virucidal* • Fungicidal • Deodorizer

Cleans Like A Cleanser WITHOUT Scrubbing!

For Hospital, Institutional and Industrial Use

Active Ingredients	
Phosphoric Acid	16.4%
Citric Acid	4.6%
Inert Ingredients**	79.0%

Formula Does Not Contain More Than 56% Phosphorus
**Active as cleaning and buffering agents.

KEEP OUT OF REACH OF CHILDREN

EPA REG. No.: 1577-100

EPA EST.: 1677-IL-2, NJ-1, TX-1, CA-1, 6574-CA-1

A product of

Ecolab Inc. Institutional Products Division
Ecolab Center
St. Paul, MN 55102

Insert "A" - Human Immunodeficiency Virus, Type I (commonly known as the AIDS virus),

Insert "B" - INSTITUTIONAL SCRUB FREE has been found effective against Human Immunodeficiency Virus, Type I, commonly known as the AIDS virus when tested in accordance with an EPA accepted protocol.

DANGER: Corrosive. Causes eye damage and skin burns. Contains phosphoric and citric acids. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear protective eyewear, clothing and rubber gloves when handling product. Wear rubber gloves when handling use solutions. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID

EXTERNAL: Immediately flush skin with plenty of cool running water for at least 15 minutes.

EYES: Hold eyelids open and flush with a steady, gentle stream of water. Remove contact lenses, if applicable. Continue flushing for at least 15 minutes.

INTERNAL: If swallowed, DO NOT induce vomiting. DO NOT GIVE CARBONATES OR BICARBONATES. Rinse mouth; then immediately drink 1 to 2 large glasses of water or milk. Never give anything by mouth to an unconscious person.

GET MEDICAL ATTENTION IMMEDIATELY!

For Emergency Medical Information, Call Toll Free 1-800-328-0026.

ACCEPTED

with COMMENTS
in EPA Letter Dated:

Institutional Scrub Free

Heavy Duty
Bathroom Cleaner/Disinfectant

Cleans and Disinfects Entire Bathroom Including: FEB 26 1989

Showers	Tubs	Tile	Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 1617-100
Sinks	Floors	Chrome	
Counters	Walls	Porcelain	
Fixtures	Toilets	Fiberglass	

For Hospital, Institutional and Industrial Use. Cleans, deodorizes and disinfects in one operation. Kills odor causing bacteria, mildew and pathogenic fungi (Trichophytes, athlete's foot fungus) and Staphylococcus aureus. Disinfects Adenovirus Type 2, Herpes Simplex Type 1 and Influenza A2/Hong Kong on inanimate, hard, nonporous surfaces. Removes the toughest soap scum, dirt and even hard water deposits WITHOUT SCRUBBING. Use on nonporous surfaces such as bathroom chrome fixtures, tile, sinks, shower doors and tubs, including porcelain and fiberglass. Non-abrasive, won't scratch. Leaves surfaces shiny clean.

*Effective against Adenovirus, Type 2, Herpes Simplex Type 1 and Influenza A2/Hong Kong

Directions For Use

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

Do not mix with anything except water. Use Scrub Free Spray Bottle and Foamer only for mixing and dispensing product.

For Daily Cleaning and Sanitizing: Add 4 oz of Institutional Strength SCRUB FREE to 16 oz Scrub Free bottle and fill with water (1:4 dilution). Completely foam the surface to be cleaned. Allow 2 minute contact with surface, then wipe with damp sponge or cloth. Rinse surface promptly with water.

For Cleaning Heavy Build-Ups: Add 8 oz of Institutional Strength SCRUB FREE to 16 oz Scrub Free bottle and fill with water. Completely foam surface to be cleaned. Allow a few minutes for Institutional Strength SCRUB FREE to work and wipe with damp sponge or cloth. Rinse promptly with water. (For excessively heavy build-ups, a second application may be necessary.)

For Disinfection: Add 8 oz Institutional Strength SCRUB FREE to 16 oz Scrub Free applicator bottle and fill with water (1:2 dilution). First remove any heavy soap deposits, then completely foam the surface with Institutional Strength SCRUB FREE. Allow 2 minutes contact. Wipe with damp cloth or sponge. Rinse promptly with water.

For precise, automatic mixing, dispense through Control Tower Specialty Product Dispenser.

NOTE: Do not use on natural marble, polished aluminum or special colored grout. May etch some older sinks and tubs. If in doubt, spot test hidden area first. Use only with foamer provided. Do not use any other sprayer. Consult your local Ecolab Specialist for assistance.

STORAGE AND DISPOSAL:

STORAGE: Store in a cool, dry area secured from general admission. Keep upright with cap tightly closed. Do not stack containers more than 2 high or under heavy objects. If container is damaged or leaking, isolate and place in secure area or receptacle. For spills, dike or plug drain. Flood with plenty of water. Broadcast SODIUM BICARBONATE or SODIUM CARBONATE over area. Rinse to drain.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage and disposal. Untreated wastes are hazardous. Improper disposal of excess pesticide, spray mixture or residue is a violation of Federal law. Dilute 50:50 with water and neutralize with SODIUM BICARBONATE or SODIUM CARBONATE. Residue may be flushed to drain with plenty of water. If wastes cannot be disposed of by use according to label, visit or contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse empty container. 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.

FORMULA CONTAINS NOT MORE THAN 56% PHOSPHORUS. IN 2 OZS PER GAL. OF SOLUTION RECOMMENDED USE CONC. IN RATION. BIODGRANDIBLE

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BEST AVAILABLE COPY