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FEB 28 1995

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

**Subject: Institutional Scrub Free
 EPA Registration No. 1677-100
 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. In compliance with Pesticide Regulation (PR) Notice 94-4, you inserted the paragraph beginning with the words, "This product is not to be used as a terminal sterilant/high level disinfectant..." in the Directions for Use section. On your finished labeling, set this paragraph in a type size that is not smaller than the rest of the Directions for Use text.
3. For the ingredient "Fragrance OS-186," ask your supplier to submit to the Agency the complete chemical identity, including the chemical name(s), CAS Registry number(s), and percentage of each component in the fragrance mixture.

1 of 4

CONCURRENCES							
SYMBOL							
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In regard to item 2 in your October 24, 1994 letter, any further reregistration-related acute toxicity reviews and comments by the Agency concerning the required acute oral and acute inhalation studies will be made in conjunction with the Mineral Acids RED. Correspondence regarding this product pursuant to the Citric Acid RED is now completed.

We are disregarding comment 3(b) in the Agency letter dated September 27, 1994 concerning the USDA authorization statement on your label, since evidence of authorization has now been submitted.

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

ECOLAB[®]

Ne
15 Gal

Institutional

Scrub Free

*Heavy Duty Bathroom
Cleaner/Disinfectant*

Active Ingredients:

Phenol
Chlorine

Inert Ingredients:

Formaldehyde
Water

KEEP OUT OF REACH OF CHILDREN.

DANGER. Causes eye damage and skin burn.

Respiratory irritation may occur.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

FEB 28 1995

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

1677-100

W

*Scrub Free is a registered trademark
78242504000403 Made in

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

Cleans Like A Cleanser WITHOUT Scrubbing! For Hospital, Institutional and Industrial Use

12013

Cleans, deodorizes and disinfects in one operation. Kills odor causing bacteria, mildew and pathogenic fungi (i.e. dermatophytes, athlete's foot fungus) and *Staphylococcus aureus*. Disinfects Human Immunodeficiency Virus, Type 1 (commonly known as the AIDS virus), 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. 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.

*Effective against Human Immunodeficiency Virus, Type 1 (commonly known as the AIDS virus), Adenovirus Type 2, Herpes Simplex Type 1 and Influenza A2/Hong Kong.

Cleans and Disinfects Entire Bathroom Including:

Showers	Fixtures	Walls	Chrome
Sinks	Tubs	Toilets	Porcelain
Counters	Floors	Tile	Fiberglass

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 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 SCRUB FREE to 16 oz Scrub Free bottle and fill with water. Completely foam surface to be cleaned. Allow a few minutes for Institutional 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 of Institutional SCRUB FREE to 16 oz Scrub Free applicator bottle and fill with water (1:2 dilution). First remove any heavy soil deposits, then completely foam the surface with Institutional SCRUB FREE. Allow 2 minutes contact with surface then wipe with damp cloth or sponge. Rinse promptly with water.

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV ON SURFACES/OBJECTS SOILED WITH BLOOD/BODY FLUIDS.

Institutional SCRUB FREE is effective as a virucide against HIV-1 (AIDS virus) on hard, non porous surfaces in the presence of moderate amounts of organic soil (10% blood serum) when used in settings where the potential for the presence of HIV-1 (AIDS virus) on inanimate surfaces is likely.

PERSONAL PROTECTION: When handling items soiled with blood or body fluids, wear personal protection such as disposable latex gloves, gowns, masks, or eye coverings.

CLEANING PROCEDURE: Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of disinfectant.

CONTACT TIME: 2 minutes

DISPOSAL OF INFECTIOUS MATERIALS: Blood and other body fluids should be autoclaved and disposed of according to local regulations for infectious waste disposal.

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.

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

For service or additional information, call 1-800-36-CLEAN (362-6326).

Authorized by USDA for use in Federally Inspected Meat and Poultry Plants.

FORMULA CONTAINS NOT MORE THAN 5.0% PHOSPHORUS, 44.2 GMS PER GALLON AVERAGE
RECOMMENDED USE CONCENTRATION.

PELIGRO: SI NO PUEDE LEER EN INGLES, PREGUNTE A SU SUPERVISOR SOBRE LAS INSTRUCCIONES DE USO APROPIADAS ANTES DE TRABAJAR CON ESTE PRODUCTO.

Precautionary Statements - Hazards to Humans and Domestic Animals

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.

CALL A POISON CONTROL CENTER OR PHYSICIAN IMMEDIATELY.

For Emergency Medical Information, Call Toll Free 1-800-328-0826.

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 rinsate 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 instructions, 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.

EPA Reg. No. 1677-100

EPA Est. 1677-N-2 (L), 1677-NJ-1 (M), 1677TX-1 (R), 1677-GA-1 (O), 1677-MN-1 (P), 1677-CA-1 (S), 1677-PR-1 (B)

THE SUPERSCRIPIT REFERS TO THE FIRST LETTER OF THE DATE CODE.

KEEP FROM FREEZING

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

ACCEPTED FOR COMMENTARY
EPA Under Draft
FEB 28 1995
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 1677-100

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Handwritten signature or initials.