UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ECOLAB Inc. 370 N. Wabasha Street St. Paul, MN 55102

ANG 2 4 1999

ATTENTION: Ann M. Oxford

SUBJECT:

Quorum Clear/Claro

EPA Registration Number 1677-148 Your Amendment Dated: May 24, 1999 EPA Received Date: May 26, 1999

The amendment referred to above, submitted in connection with registration under FIFRA as amended to include directions for continuous treatment of meat and poultry or fruit and vegetable conveyors as well as other revisions to the label of the above referenced product, is acceptable provided that you:

- 1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
- A. On page one of the label the phrase "For Commercial Use Only" must be changed to read as follows "For Institutional and Commercial Use Only." This statement may be modified to state "For Institutional Use Only" when this product is being marketed specifically to institutions. The following sites on your label qualify as institutions: hospitals, nursing homes, and schools. When this product includes the phrase "For Institutional Use Only" the directions for other sites such as restaurants (which are commercial) must not be included on the label. The Agency will allow the phrase "For Commercial Use Only" when this product is marketed to restaurants, food services, dairies, beverage and food processing plants. When marketed specifically to commercial sites the directions for other types of sites must not be included on the label
- B. According to Webster's Collegiate Dictionary, tenth edition, the abbreviation for the word "gallons" is "gal." Delete "gl" as it appears twice on page two and replace it with "gal" or "gallons."

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- C. On page two identify the sites for disinfection by listing "Institutions, Hospitals, Nursing Homes, Schools, Restaurants, Food Service, Dairies, and Beverage and Food Processing Plants" immediately following the subheading "Disinfection".
- D. On page two add the following statement immediately following the directions for disinfecting: "Any food contact surfaces that have been disinfected must be thoroughly rinsed with potable water." Alternatively you may delete the broad phrase "...and other nonporous surfaces..." from this section. If you intend to leave this phrase (and add the statement "Any food contact surfaces...") revise it as follows: "...and other hard nonporous surfaces..."

Also revise this section to read "Prepare fresh use solution at least daily or when..."

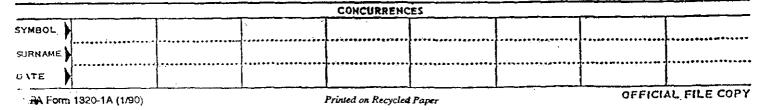
- E. On page two under the subheading "Dairy and Mushroom Farms" revise the phrase "...and inanimate hard surfaces..." to read "...and inanimate hard nonporous surfaces..."
- F. As per DIS/TSS-17 (which is enclosed), your label must instruct the user to rinse with potable water prior to sanitization. Thus make the following revisions:
- 1. On page two under "Sanitizing Equipment-Food Processing Plants-Restaurants" revise "...follow with a water rinse..." to read "...follow with a potable water rinse..." Also revise the last statement of this section to read "...drain thoroughly and air dry." which would agree with the instructions for EPA Reg. No. 1677-43.
- 2. On page three under "Restaurant and Bar Rinse-Sanitizing Eating and Drinking Utensils" revise the third statement to read "Rinse with *potable* water."
- 3. Also on page three under "For Continuous Treatment of Meat and Poultry of Fruit and Vegetable Conveyors" revise the statement "...rinse equipment thoroughly with clear water..." to read "...rinse equipment thoroughly with *potable* water..."

Make the same change to your other labels at the next submission to the Agency for label amendment.

G. Revise the beginning of the section "Elevated Temperature Sanitizing" as follows (to agree with the label for EPA Reg. No. 1677-43)

"For sanitization of equipment in food processing plants, and restaurants, remove gross food particles and excess soil by a pre-flush or pre-scrape, was with a good detergent or compatible cleaner, rinse equipment thoroughly with potable water, then rinse equipment with a sanitizing solution." The remaining three sentences of this section must be retained.

- H. On page three revise under "Directions for Fogging" add a list of the sites which may be fogged as follows "Dairies, Beverage and Food Processing Plants. Also revise the phrase "To sanitize hard room surfaces.." to read "To sanitize hard nonporous room surfaces.."
- I. In the fifth section of page three which begins with the phrase "To sanitize hard nonporous room surfaces..." revise the sentence which begins "All food contact surfaces must be thoroughly rinsed with a product solution..." to read as follows "All food contact surfaces must be sanitized with a product solution of 200 ppm..."



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- J. At the bottom of page three, the claim for "Hand Sanitizing" is not a FIFRA claim as per 40 CFR part 152.8. This claim is subject to the purview of/and regulated by the Food and Drug Administration (FDA) under the Federal Food, Drug and Cosmetic Act (FFDCA). Therefore, you must remove this claim from your label.
- K. Your label must include a "Pesticide Storage" statement as per PR Notice 83-3. Revise your label to include the following "Pesticide Storage" statement:

"Store this product in a cool, dry area, (locked if possible), away from direct sunlight, and heat."

2. Submit two (2) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C)

Enclosure

7510C:T. Lantz:8/19/99:1677-148

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Under the Federal Insecticide,
Flangicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1677-148

QUORUM CLEAR/CLARO amended, for the pesticide,

DISINFECTANT - DEODORIZER - SANITIZER

ACTIVE INGREDIENTS:

n-Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈) dimethyl benzyl ammonium chlorides	5.0%
n-Alkyl (68%C ₁₂ , 32% C ₁₄) dimethyl ethylbenzyl ammonium chlorides	5.0%
INERT INGREDIENTS:	90.0%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN DANGER

PRECAUTIONARY STATEMENTS - HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin or on clothing. Wear rubber gloves, chemical goggles, and protective clothing when handling. Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

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

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF SWALLOWED: Rinse mouth at once; then drink one or two glasses of water. DO NOT

INDUCE VOMITING. Never give anything by mouth to an unconscious person.

CALL A POISON CONTROL CENTER OR PHYSICIAN IMMEDIATELY

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

ENVIRONMENTAL HAZARDS: 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 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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

FOR COMMERCIAL USE ONLY
DO NOT MIX WITH ANYTHING BUT WATER

EPA Reg. No. 1677-148

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.

Manufactured by:

Ecolab Inc.

370 N. Wabasha Street

St. Paul, MN 55102

Net Contents: 1 gallon (3.73 L)

2.5 gallon (9.45 L)

5 gallons (18.9 L)

55 gallons (208.8 달) ·

300 gallon tote :

INSTITUTIONS - HOSPITALS - NURSING HOMES - SCHOOLS - RESTAURANTS - FOOD SERVICES - DAIRIES - BEVERAGE AND FOOD PROCESSING PLANTS

DIRECTIONS FOR USE

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

Prior to use of this product, remove gross food particles and soils from all surfaces by a preflush, or pre-scrape and, when necessary presoak treatment. Wash with detergent or other cleaning solution followed by a thorough potable water rinse.

DEODORIZING

After cleaning, deodorize waste containers and inaccessible areas with 1 oz product to 1 gI water (800 ppm). Flush surfaces thoroughly or apply by mopping or sponging onto the surface.

DISINFECTING

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For floors, walls, woodwork, sink tops, garbage pails, telephones, rest rooms, bathroom fixtures, and other nonporous surfaces, this product is effective against <u>Pseudomonas aeruginosa</u> PRD-10 at 3 1/2 oz per 5 gl water. Remove gross filth or heavy soil and preclean surface. Apply disinfecting solution to surface by flushing, mopping, sponging or hand pump spraying so as to thoroughly wet surface. Allow to remain wet for 10 minutes, then remove solution with a clean mop, cloth, or wet vacuum pickup. Prepare fresh use solution daily or when it becomes visibly dirty.

DAIRY AND MUSHROOM FARMS

To sanitize dairy or mushrooms equipment, clean and rinse equipment thoroughly. Apply sanitizing solution containing 1 oz product per 4 gallons of water (200 ppm). At this level, no potable water rinse is required after complete draining. This product can also be used to disinfect floors, walls, and inanimate hard surfaces on the mushroom premises only in areas where compost and mushrooms are not present.

SANITIZING EQUIPMENT - FOOD PROCESSING PLANTS - RESTAURANTS
For sanitizing precleaned food processing equipment or utensils in federally inspected meat and poultry processing plants, restaurants, clean equipment with a good detergent and follow with a water rinse. Then rinse equipment with a sanitizing solution of 1 oz product per 4 gallons of water (200 ppm). All surfaces should be exposed to the sanitizing solution for a period of not less than 1 minute. Allow equipment to drain thoroughly.

ELEVATED TEMPERATURE SANITIZING

For sanitization of equipment in food processing plants, restaurants, clean and rinse equipment thoroughly. At a temperature of 120 deg F, this product is an effective sanitizer for food contact surfaces at 1 ounce product to 10 gallons of water. All surfaces should be exposed to the sanitizing solution for a period of not less than 1 minute. Allow equipment to drain thoroughly.

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RESTAURANT AND BAR RINSE - SANITIZING EATING AND DRINKING UTENSILS

- 1. Scrape and preflush utensils to remove excess soil.
- 2. Wash with good detergent or compatible cleaner (see your Ecolab representative for a recommendation).
- 3. Rinse with clear water.
- 4. Sanitize in a solution of 1 oz product to 4 gallons of water (200 ppm). Immerse all utensils for at least one minute. Use 2 minutes exposure time if required by governing sanitary code.
- 5. Drain and air dry.

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 solution should be prepared as soon as they become diluted or soiled.

FOR CONTINUOUS TREATMENT OF MEAT AND POULTRY OR FRUIT AND VEGETABLE CONVEYORS – Remove gross food particles and excess soil by a pre-flush or pre-scrape, wash with a good detergent or compatible cleaner, rinse equipment thoroughly with clear water, then rinse equipment with a sanitizing solution. During processing, apply Quorum Clear/Claro at a 200 ppm quat level to conveyors with MIKRO MASTER or other suitable feeding equipment. Controlled volumes of sanitizer are applied to return portion of conveyor through nozzles so located as to permit maximum drainage of sanitizer from equipment and to prevent puddles on top of belt. During interruptions in operation, coarse spray equipment, peelers, collators, slicers and saws with MIKRO MASTER dispensed Quorum Clear/Claro solution of 200 ppm quat. Conveyor equipment should be free of product when applying this coarse spray.

SANITIZING SHELL EGGS INTENDED FOR FOOD: To sanitize previously cleaned food-grade eggs in shell egg and egg product processing plants, spray with a solution of 1 oz product in 4 gallon of warm water (200 ppm quat). The solution should be warmer than the eggs, but not to exceed 130°F. Wet eggs thoroughly and allow to drain. Eggs sanitized with this product shall be subjected to a potable water rinse only if broken immediately for use in the manufacture of egg products. Eggs should be reasonably dry before casing or breaking. The solution should not be reuse for sanitizing eggs.

DIRECTIONS FOR FOGGING: To sanitize hard room surfaces as an adjunct to acceptable manual cleaning and disinfecting as described above. Prior to fogging, food products and packaging material must be removed from the room or carefully protected. After cleaning, fog desired areas using one quart per 1000 cu. ft. of room area with a product solution containing 1.5 oz product to 1 gallon of water (1200 ppm). Vacate the area of all personnel during fogging and for a minimum of 2 hours after fogging. All food contact surfaces must be thoroughly rinsed with a product solution of 200 ppm active quaternary (1/2 oz per 2 gallons) prior to reuse. Allow food contact surfaces to drain thoroughly before operations are resumed.

HAND SANITIZING: After hands have been washed and rinsed, dip in a 1 ounce per 5 gallons solution of QUORUM CLEAR/CLARO (150 ppm active quaternary).

ACCEPTED

with COMMENTS in EFA Letter Dated:

AUG 24 1999

1677-148

05/24/99

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) Do not reuse empty containers. Wrap container and put in trash.

- (5, 55 gallon plastic) 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.
- (2.5 gallon bladder in box) Remove empty bladder from outer corrugated box. Triple rinse bladder (or equivalent). Offer box and bladder for recycling or dispose of in a sanitary landfill or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. (Totes) Verify that the tote is empty. Do not rinse or clean. Seal tote and contact Ecolab for return.

ACCEPTED with COMMENTS in EPA Letter Dated:

AUG 24 1999

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

1677-148