

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 31 2004

Brian C. Brosdahl
Senior Manager, Regulatory Affairs
Ecolab Inc.
370 N. Wabash Street
St. Paul, MN 55102

Subject: **Quorum Clear/Claro**
EPA Registration Number 1677-148
Application Dated June 4, 2004
EPA Received Date June 6, 2004

Dear Mr. Brosdahl:

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

Proposed Amendment:

- add "Hand Sanitizing" directions for use

Label Comments:

1. Revise the "Sanitizing- Non-Porous Gloved Hands"
 - a. Since your product is cleared as a food contact sanitizer we will allow the gloves to be sanitized prior to use in packaging and storage areas of food plants.
 - b. we are very concerned about personnel exposing their hands to the sanitizing solution, thus place the following statement in bold text: "Do not let sanitizing solution come into contact with exposed skin."
2. Revise the "Sanitizing- Non-Porous Gloved Hands:" directions to read exactly as follows, deleting all of your proposed text:

To prevent the spreading of harmful organisms into animals areas and the packaging and storage areas of food plants, dip per-washed (plastic, latex or other synthetic rubber) gloved hands into a suitable clean container that contains enough freshly made

CONCURRENCES


SYMBOL							
SURNAME							
DATE							

sanitizing solution to cover the gloved area. **Do not let sanitizing solution come into contact with the exposed skin.** Make up the sanitizing solution by adding a 1 ounce of this product per 4 gallons of water (or equivalent use dilution) (200 ppm active). Dip (soak) in solution for 60 seconds. **No POTABLE WATER RINSE IS ALLOWED.** Change the sanitizing solution in the bath at least daily or when solution appears dirty.

General Comments:

A stamped copy of the labeling accepted with conditions is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland on (703) 308-6224.

Sincerely,


Verma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510C)

QUORUM CLEAR/CLARO

DISINFECTANT - DEODORIZER - SANITIZER

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

ACTIVE INGREDIENTS:

n-Alkyl (60% C₁₄, 30% C₁₆, 5% C₁₂, 5% C₁₈) Dimethyl Benzyl Ammonium Chlorides 5.0%
n-Alkyl (68% C₁₂, 32% C₁₄) 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.

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 immediately 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.

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

OUTSIDE NORTH AMERICA, CALL 1-651-222-5352

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

Have product container or label with you when calling a poison control center or doctor, or going for treatment.

ENVIRONMENTAL HAZARDS (5 gallons or greater):

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.

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:

AUG 31 2004

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

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 *Quorum Clear/Claro*, remove gross food particles and soils from all surfaces by a pre-flush, 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. *Quorum Clear/Claro* to 1 gallon of water (800 ppm). Flush surfaces thoroughly or apply by mopping or sponging onto the surface.

Disinfecting: For floors, walls, finished woodwork, sink tops, garbage pails, telephones, rest rooms, bathroom fixtures, toilet bowl exteriors, and other hard, nonporous surfaces, *Quorum Clear/Claro* is effective against *Pseudomonas aeruginosa* PRD-10 at 3 1/2 oz. per 5 gallons of 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 surface to remain wet for 10 minutes, then remove solution with a clean mop, cloth, or wet vacuum pickup. Prepare fresh use solution at least once daily or when it becomes visibly dirty. Any food contact surfaces that have been disinfected must be thoroughly rinsed with potable water.

Dairy And Mushroom Farms: To sanitize dairy or mushroom equipment, clean and rinse equipment thoroughly. Apply sanitizing solution containing 1 oz. *Quorum Clear/Claro* per 4 gallons of water (200 ppm). At this level, no potable water rinse is required after complete draining.

Quorum Clear/Claro can also be used to disinfect floors, walls, and hard, non-porous surfaces on the mushroom premises only in areas where compost and mushrooms are not present. Follow disinfectant directions then rinse treated surfaces with potable water before contact with the crop, compost or casing.

Sanitizing Equipment - Food Processing Plants – Restaurants: For sanitizing precleaned food processing equipment or utensils in federally inspected meat and poultry processing plants or restaurants. Clean equipment with a good detergent and follow with a potable water rinse, then rinse equipment with a sanitizing solution of 1 oz. *Quorum Clear/Claro* 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 and air dry.

Elevated Temperature Sanitizing: For sanitization of equipment in food processing plants and restaurants, 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 potable water, then rinse equipment with a sanitizing solution. At a temperature of 120 deg. F, *Quorum Clear/Claro* is an effective sanitizer for food contact surfaces at 1 oz. 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.

Restaurant and Bar Rinse - Sanitizing Eating and Drinking Utensils

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

NOTE: FOR MECHANICAL OPERATIONS: A prepared use solution may not be reused for sanitizing, but may be reused for other purposes such as cleaning.

FOR MANUAL OPERATIONS: Prepare a fresh sanitizing solution at least daily or sooner if it becomes 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 potable 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. *Quorum Clear/Claro* in 4 gallons 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 *Quorum Clear/Claro* 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 reused for sanitizing eggs.

DIRECTIONS FOR FOGGING: To sanitize hard, non-porous room surfaces in dairies, beverage and food processing plants, 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 *Quorum Clear/Claro* solution containing 1.5 oz. *Quorum Clear/Claro* 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 sanitized with a *Quorum Clear/Claro* solution of 200 ppm active quaternary (1/2 oz per 2 gal) prior to reuse. Allow food contact surfaces to drain thoroughly before operations are resumed.

SANITIZING – NON-POROUS GLOVED HANDS: Use *Quorum Clear/Claro* solution at 200 ppm (1 oz. per 4 gallons of water) active quaternary to sanitize gloved hands. The gloved hands need not be rinsed after use of *Quorum Clear/Claro*.

**FOR INSTITUTIONAL AND COMMERCIAL USE ONLY
DO NOT MIX WITH ANYTHING BUT WATER**

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STORAGE & DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL

PESTICIDE STORAGE: Store this product in a cool, dry area, locked if possible, away from direct sunlight and heat.

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.

(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.

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), 1677-WV-1 (V), 303-IL-1 (L), 1677-CA-2 (R)

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

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

Net Contents:	1 gal (3.78 L)
	2.5 gal (9.45 L)
	5 gal (18.9 L)
	55 gal (208.8 L)
	300 gal tote