

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 8 1997

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

Attention: Ann M. Oxford
Manager, Regulatory Services

Subject: Enviro San
EPA Registration Number 1677-165
Your Submission Dated February 14, 1997

This letter is to acknowledge receipt of your updated Confidential Statement of Formula (CSF).

The CSF, dated February 3, 1997 which lists all starting materials before the reaction is acceptable. It agrees with the final product after the reaction.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, subject to the following comments. A stamped copy is enclosed for your records.

The "Container Disposal" instructions for 1 gallon or less should be: Do not reuse empty container. Wrap container and put in trash collection. Please note that instructions may not be "Do not rinse empty container". It should be "Do not reuse empty container."

For the alternate container disposal instructions, instructions must be given for "Empty as completely as possible", it must tell how and where to empty container. The proposed container disposal instructions are acceptable. More specific instructions must be given for the disposal of pesticide.

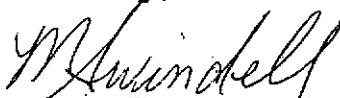
Submit one (1) copy of the finished printed label before this product is released for shipment.

CONCURRENCES

SYMBOL	1510W						
SURNAME	J. J. [Signature]						
DATE	5-9-97						

If you have any questions about the comments in this letter, you should contact Zenobia Jones at (703) 308-6198.

Sincerely,



Marshall Swindell
Acting Product Manager 31
Regulatory Management Branch 1
Antimicrobial Division (7510W)

ECOLAB

ENVIRO SAN

14130

EPA Reg. No. 1677-165
EPA Est. 60156-IL-1 (S), 1677-MN-1(P)
Superscript refers to first letter of date code

Acid Liquid Sanitizer for Sanitizing Tableware and Food Processing Equipment
in Restaurants, Food Service Operations, Dairies, Dairy Farms, Breweries, Wineries, Beverage and Food Processing Plants

Active Ingredients:
Hydrogen peroxide 14.9%
Peroxyacetic acid 7.1%
Inert Ingredients 78.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE: Causes severe eye and skin burns. Harmful or fatal if swallowed. Do not get in eyes, on skin, or on clothing. Wear chemical goggles, rubber gloves, and protective clothing when handling this product. 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: Immediately wash with plenty of soap and water. Get medical attention.
If swallowed: Drink promptly large quantities of water. Avoid alcohol. 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.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

PHYSICAL AND CHEMICAL HAZARDS:

Strong oxidizing agent. Corrosive. Do not use in concentrated form. Mix only with water according to the label instructions. Never bring concentrate in contact with other sanitizers, cleaners, or organic substances.

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

STRONG OXIDIZING AGENT

DIRECTIONS FOR USE:

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

SANITIZATION

ENVIRO SAN acid sanitizer is recommended for use on pre-cleaned surfaces such as tableware, utensils, dishes, equipment, pipelines, tanks, vats, fillers, evaporators, pasteurizers and aseptic equipment in restaurants, food service operations, dairies, breweries, wineries, beverage and food process plants. This product is effective as a sanitizer when solution is prepared in water of up to 500 ppm hardness as CaCO₃.

Elevated Temperature Sanitizing - For sanitization of equipment in food processing plants, restaurants, etc., remove gross food particles by a prescrape, preflush and, when necessary, a presoak treatment. Wash with detergent. Rinse with potable water. At a temperature of 120 deg F, ENVIRO SAN is an effective sanitizer for food contact surfaces at a concentration of 0.065 to 0.08% v/v (1 oz. ENVIRO SAN to 10 to 12 gallons water) against *Staphylococcus aureus* and *Escherichia coli*. 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.

Sanitizing Tableware - Remove gross food particles by a prescrape, preflush and, when necessary, a presoak treatment. Wash with detergent. Rinse with potable water. For sanitizing tableware in low-temperature warewashing machines, inject ENVIRO SAN into the final rinse water at a concentration of 0.065% to 0.08% v/v (1 oz. per 10 to 12 gallons of water). Do not exceed 0.08% v/v. Drain thoroughly and air dry.

To insure that the ENVIRO SAN sanitizer concentration does not fall below 0.065%, periodically test the rinse solution with a suitable test kit and adjust the dispensing rate accordingly. Consult your local Ecolab Specialist for technical assistance and further information on sanitizing tableware in warewashing machines.

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

NOTE: This product in its use solutions is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

STORAGE & DISPOSAL

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

STORAGE: Product should be kept cool and in a vented container to avoid any explosion hazard.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If the 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 gal or less) Do not rinse empty containers. Wrap container and put in trash. (5, 15, 30, 55 gal plastic) Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and disposed of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned, stay out of smoke.

NET CONTENTS:

5 U.S. Gals. (18.9 liters)

Manufactured by:

ECOLAB INSTITUTIONAL DIVISION
Ecolab Inc.
370 Wabasha Street
St. Paul, MN 55102

AMO/5301/0996

ACCEPTED
MAY 8 1997
1677-165

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INFORMATION SHEET #1

Enviro San

Acid Liquid Sanitizer for Sanitizing Tableware and Food Processing Equipment
in Restaurants, Food Service Operations, Dairies, Dairy Farms, Breweries, Wineries, Beverage
and Food Processing Plants

EPA Reg. No. 1677-165

[Alternate Container Disposal for certain types of packaging]

CONTAINER DISPOSAL: Empty container as completely as possible. Dispose
of in a sanitary landfill, or incineration, or if allowed by state and local authorities,
by burning. If burned, stay out of smoke.

RECYCLED
WITH CONTAMINANTS
TO THE EXTENT POSSIBLE
MAY 8

1677-165

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St. Paul, MN 55102