

June 25, 2003

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

Subject: Ful-Bac  
EPA Registration No. 1677-177  
Application Date: May 26, 2003  
Receipt Date: May 28, 2003

Dear Mr. Brosdahl:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with the following conditions:

**Proposed Amendment**

- revision to First Aid Statement in accordance with PR Notice 2001-1
- revision to Storage and Disposal statements

**Conditions**

- 1) Place the Environmental Hazards Statement directly above the Physical and Chemical Hazards Statement.
- 2) Revise the second sentence of the Pesticide Disposal section of the Storage and Disposal Statement to read "Do not contaminate water, food or feed..."

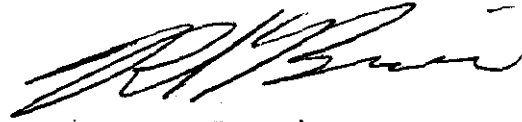
**General Comments**

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of you final printed labeling before distributing or selling the product bearing the revised labeling.

CONCURRENCES							
SYMBOL	7510 C						
SURNAME	E. Berg						
DATE	6/25/03						

Should you have any questions concerning this letter, please contact me at (703) 308-6264.

Sincerely,



Robert S. Brennis  
Product Manager (32)  
Regulatory Management Branch II  
Antimicrobials Division (7510C)

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

# FUL-BAC

## Sodium Hypochlorite Sanitizer

**Active Ingredients:**

Sodium Hypochlorite..... 12.5%

**Inert Ingredients:**..... 87.5%

**Total:**..... 100.0%

**FOR INDUSTRIAL USE ONLY**

### KEEP OUT OF REACH OF CHILDREN DANGER

#### PRECAUTIONARY STATEMENTS

##### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER: CORROSIVE:** May cause severe skin and eye irritation or chemical burns to broken skin. Causes eye damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling this product. Wash after handling. Avoid breathing vapors. Evacuate poorly ventilated areas as soon as possible. Do not return until odors have dissipated. Consult Material Safety Data Sheet for additional information.

##### 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 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 1-612-292-4064**

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

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

##### PHYSICAL AND CHEMICAL HAZARDS

Strong oxidizing agent. Mix only with water according to label directions. Mixing this product with gross filth such as feces, urine, etc., or ammonia, acids, detergents or other chemicals may release hazardous gases irritating to eyes, lungs and mucous membranes.

##### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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

JUN 25 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 1677-177

**DIRECTIONS FOR USE**

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

**Directions for Sanitizing Food Processing or Dairy Equipment:** Clean Equipment in a normal manner. Just before using, rinse all surfaces thoroughly with Sodium Hypochlorite solution containing 200 ppm available chlorine. Maintain contact with sanitizer for a minimum of two (2) minutes. Do not rinse with water after treatment with sodium hypochlorite solution. Do not soak overnight. Addition of one (1) fluid ounce (2 tablespoons) of this sodium hypochlorite solution per 5 gallons of water will provide approximately 200 ppm available chlorine by weight.

**Food Egg Sanitization:** Thoroughly clean all eggs. Thoroughly mix 2 oz. of this product with 10 gallons of warm water to produce a 200 ppm available chlorine solution. The sanitizer temperature should not exceed 130°F. Spray with warm sanitizer so that the eggs are thoroughly wetted. Allow the eggs to thoroughly dry before casing or breaking. Do not apply a potable water rinse. The solution should not be re-used to sanitize eggs.

**Fruit and Vegetable Washing:** Thoroughly clean all fruits and vegetables in a wash tank. Thoroughly mix 5 oz. of this product with 200 gallons of water to make a sanitizing solution of 25 ppm available chlorine. After draining the tank, submerge fruit or vegetables for 2 minutes in a second wash tank containing the recirculating sanitizing solution. Spray rinse vegetables with the sanitizing solution prior to packaging. Rinse fruit with potable water only prior to packaging.

**Processing and Chill Water for Poultry Processing:**

Follow guidelines of local water authority for water potability treatment.

**Continuous Feed:** Using automatic metering device, continuously feed this product into the water to obtain and/or maintain a level of available chlorine that is in accordance with USDA guidelines. Confirm target chlorine level with either a chlorine test kit or an automatic testing device. When the available chlorine level reach 20 ppm, notify the USDA plant inspector.

**Intermittant Feed:** Start up by adding .9 oz. of this product per 1,000 gallons of water for each 1 ppm of available chlorine needed. For subsequent doses, check chlorine level with a chlorine test kit, add enough of this product to maintain the target chlorine level, and confirm this level with a chlorine test kit. Do not pour this product directly on poultry product in the water.

**STORAGE & DISPOSAL**

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL. OPEN DUMPING IS PROHIBITED.

**Pesticide Storage:** Store this product in cool, dry area away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water.

**Pesticide Disposal:** Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. So not contaminate water, food or feed by storage, disposal or cleaning equipment.

**Container Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Net Contents: 55 U.S. gal. /208 L
-----------------------------------

EPA Reg. No. 1677-177

EPA Est.: 1677-IL-2 (J), 1677-NJ-1 (W), 1677-TX (D), 1677-GA-1 (M), 1677-CA-1 (S), 1677-MN-1 (P), 1677-PR-1 (B), 37982-CA-2 (T), 37982-CA-3 (A), 11321-CA-1 (C), 1677-OH-1 (H), 1677-CA-2 , 1677-NC-1 (N), 1677-MO-1 (K), 1677-WV-1 (V).

Superscript refers to first letter of date code

Ecolab Inc.  
370 Wabasha Street N.  
St. Paul, MN 55102-1390