PM 33 1677-189 12/14/99 184

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 14 1999

John Wood
Ecolab Inc.
370 N. Wabash Street
St. Paul, MN 55102

RE: Cooling Care 2905
EPA Reg. No. 1677-189
Your Amendment Dated 6/15/99

The Amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to a non-food contact sanitizing claim and use directions for ultra-filtration and reverse osmosis membranes, and to revise the Precautionary Statements and Statement of Practical Treatment are acceptable with one comment.

SUBMITTED EFFICACY DATA IS ACCEPTABLE

The efficacy data found in the submitted study MRID 448629-01 is acceptable. The product was found to be an effective (>99.9% reduction) non-food contact surface sanitizer against Staphylococcus aureus and Enterobacter aerogenes. A copy of the Agency review is attached.

PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

The revised "Precautionary Statements" and "Statement of Practical Treatment" are acceptable. They are based on the following acute toxicology categories.

Oral – 3
Dermal – 2
Inhalation – 2
Eye – 1
Skin – 1
Sensitization –Not a sensitizer

LABEL CORRECTIONS

1. In the ultra-filtration and reverse osmosis membrane use directions, change the first sentence which reads "Not for use on kidney dialysis membranes and associated systems", to read as follows. It should be a boldfaced sentence.

~~"Not for kidney dialysis membranes, associated systems, and any other medical~~

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

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devices of this type".

A label stamped "Accepted With Comments" is attached for your files.

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,

Marshall Swindell,
Product Manager Team 33,
Regulatory Management Branch I
Antimicrobials Division (7510C)

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ACCEPTED
with COM ENTS
in EPA Le. Dated:

DEC 1 4 1999

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-189

EPA Reg. No. 1677-189
EPA Est. 60156-IL-1

BACTERIA, FUNGI AND ALGAE IN RECIRCULATING COOLING TOWERS, AIR WASHERS, AND HEAT TRANSFER SYSTEMS - A RIAL USE REVERSE OSMOSIS (RO) MEMBRANES AND THEIR ASSOCIATED DISTRIBUTION SYSTEMS.

OR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

TING COOLING WATER SYSTEMS
acteria, algae and fungi add CoolingCare-2905 to the tower basin, distribution box or some other point to mixing.

T OR SLUG METHOD
OSE - When the system is noticeably fouled apply 100 to 500 ppm CoolingCare 2905 (0.83 to 4.2 pounds ns of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned t is begun.
UENT DOSE - After microbial control is evident, add 40 to 100 ppm CoolingCare 2905 (0.33 to 0.83 pounds *s of water in the system) weekly or as needed to maintain microbial control. Badly fouled systems must be* treatment is begun.

FEED METHOD
OSE - When the system is noticeably fouled apply 80 to 150 ppm CoolingCare 2905 (0.66 to 1.24 pounds ns of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned t *is begun.*
UENT DOSE - Maintain this treatment level by starting a continuous feed of 40 to 100 ppm CoolingCare 2905 ounds per 1,000 gallons of makeup water added to the system). Badly fouled systems must be cleaned t is begun.

SFER SYSTEMS - (Evaporative Condensers, Dairy Sweetwater Systems, Hydrostatic Sterilizers and g Canals, Pasteurizers, Tunnel Coolers and Warmers, and Closed and Once Through Cooling Systems) This be used at the same application rates as described above. It should be added to the system at a point of such as a basin area, sump area or other reservoir or collecting area from which the treated water will be rmly throughout the system.

T OR SLUG METHOD
DOSE - When the system is noticeably fouled apply 100 to 500 ppm CoolingCare 2905 (0.83 to 4.2 pounds *ns of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned* nt is begun.
UENT DOSE - After microbial control is evident, add 40 to 100 ppm CoolingCare 2905 (0.33 to 0.83 pounds ns of water in the system) weekly or as needed to maintain microbial control. Badly fouled systems must be treatment is begun.

the following statement will appear on the label: See package inert (or hang tag or technical bulletin) for ction for use.]

CONTINUOUS FEED METHOD

INITIAL DOSE - When the system is noticeably fouled apply 80 to 150 ppm CoolingCare 2905 (0.66 to 1.24 pounds per 1,000 gallons of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

SUBSEQUENT DOSE - Maintain this treatment level by starting a continuous feed of 40 to 100 ppm CoolingCare 2905 (0.33 to 0.83 pounds per 1,000 gallons of makeup water added to the system). Badly fouled systems must be cleaned before treatment is begun.

AIR WASHER SYSTEMS - Add to the Air Washer sump or Chill Water or to the Coil Spray Water to insure uniform mixing at rate of 40-1000 ppm (0.33 to 8.3 pounds per 1,000 gallons of water in the system) depending on the severity of contamination to control bacteria, fungi and algae in industrial air washer systems.

AIR AND GAS SCRUBBER AND COW WATER SYSTEMS - This product should be added to the system at a convenient point of mixing. Add 300 to 3000 ppm (2.5 to 25 pounds per 1,000 gallon of water) to control bacteria, fungi and algae in these water systems.

STORAGE AND DISPOSAL: DO NOT CONTAMINATE WATER OR FOOD BY STORAGE OR DISPOSAL

STORAGE: Product should be kept cool and in 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 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: [4 gallon pails and 50 gallon drum] 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. [300 gallon tote] Verify that the tote is empty. Do not rinse or clean. Seal tote and contact Ecolab for return.

ET CONTENTS:

.S. Gals. (15.1 liters) 50 U.S. Gals. (189 liters) or 300 gallon tote

Additional directions for use
[may be on the label, as a package insert, hang tag, or technical bulletin]

BATCH SANITIZATION (NON-FOOD CONTACT SURFACES) FOR ULTRA FILTRATION AND REVERSE OSMOSIS (RO) MEMBRANES

Not for use on kidney dialysis membranes and associated systems. This product has been shown to be an effective sanitizer when tested by AOAC and EPA methods. This product may not totally eliminate all vegetative microorganisms in reverse osmosis membranes and their associated piping systems due to their construction and/or assembly, but can be relied upon to reduce the number of microorganisms to acceptable levels when used as directed. Check with equipment manufacturer for membrane compatibility with CoolingCare 2905.

1. Clean the membrane or other parts of the system with an appropriate cleaner to remove biological or organic fouling.
2. Flush the system with RO permeate or similar quality water.
3. If necessary, circulate an appropriate acid cleaner to remove mineral deposits.
4. Flush the system with RO permeate or similar quality water.
5. Prepare CoolingCare 2905 by adding 43 - 157 fluid ounces of product to 100 gallons of water. This will provide 150 - 550 ppm peroxyacetic acid.
6. Fill the system to be sanitized with the CoolingCare 2905 solution and allow to reach a minimum temperature of 20 degrees C.
7. Recirculate the CoolingCare 2905 solution for 10-15 minutes.
8. Allow membrane elements to soak in the CoolingCare 2905 solution for 20 minutes.
9. Drain the CoolingCare 2905 solution from the system and rinse with RO permeate, or similar quality water, until the residual peroxyacetic acid is below 3 ppm.

BATCH SANITIZATION (NON-FOOD CONTACT SURFACES) OF PIPING SYSTEMS ASSOCIATED WITH RO MEMBRANES

1. Isolate incompatible equipment from piping system. This includes activated carbon filters and ion exchange equipment. Turn off power to ultraviolet light units.
2. Estimate total volume of water contained in the system (tanks, rinse stations, and piping). Prepare CoolingCare 2905 by adding 43 - 157 fluid ounces of product per 100 gallons of water. Use RO permeate or similar quality water for dilution. This will provide 150 - 550 ppm peroxyacetic acid.
3. Recirculate the CoolingCare 2905 solution for a minimum of 4 hours. Process usage valves should be opened and closed to expose internals to the CoolingCare 2905 solution.
4. Drain the CoolingCare 2905 solution from the system and rinse with RO permeate, or similar quality water, until the residual peroxyacetic acid is below 3 ppm.

CONTINUOUS /INTERMITTENT ADDITION TO MINIMIZE THE ACCUMULATION OF BIOLOGICAL MATTER BETWEEN SANITIZING EPISODES

1. CoolingCare 2905, as received or diluted, may be added continuously to the feed water system between sanitizing episodes to aid in minimizing the accumulation of biological matter. The peroxyacetic acid residual concentration in the system will vary with the design and usage characteristics of the system. Adjust the addition rate of CoolingCare 2905 or CoolingCare 2905 solution and periodically monitor the peroxyacetic acid concentration so that the desired effect is obtained.
2. For continuous addition do not exceed 22.2 ppm CoolingCare 2905. This will provide 1 ppm peroxyacaetic acid. For intermittent feed do not exceed 2333 ppm CoolingCare 2905. This will provide 105 ppm peroxyacetic acid.

EPA Reg. No. 1677-189

ECOLAB®

FOOD & BEVERAGE DIVISION
Ecolab Inc.
370 Wabasha Street
St. Paul, MN 55102

ACCEPTED
with COMMENTS
in EPA Letter Dated:

DEC 14 1999

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

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