

1677-194

5-19-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

May 19, 2003

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

Subject: Mandate Plus  
EPA Registration No. 1677-194  
Application Date: May 3, 2003  
EPA Received Date: May 6, 2003

Dear Mr. Brosdahl:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA 3(c)9.

**Proposed Notification**

- Correction of the metric "Use Dilution" numbers

**General Comments**

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable. A copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,

Adam Heyward  
Product Manager 34

		CONCURRENCES				
SYMBOL	7510C					Regulatory Management Branch II Antimicrobials Division (7510 C)
SURNAME	Gray					
DATE	5-19-03					

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<b>EPA</b> United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input checked="" type="checkbox"/> <b>Other</b>	OPP Identifier Number  
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**Application for Pesticide - Section I**

1. Company/Product Number <p style="text-align: center;">1677-194</p>	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <p style="text-align: center;">Mandate Plus</p>	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Ecolab Inc. 370 N. Wabasha Street St. Paul, MN 55102  <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3 (c) (3) (b) (i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional Page(s) if necessary. (For section I and Section II)

This notification is per PR Notice 98-10(II)(M)(1), Changes in mixing directions which do not affect the dilution ratio or the minimum or maximum use dilutions. Ecolab has corrected the metric "Use Dilution" numbers. The current directions read (0.130 to 0.143 mL per Liter) and (0.234 to 0.260 mL per Liter). The directions have been corrected to read (1.3 to 1.43 mL per Liter) and (2.34 to 2.6 mL per Liter). This change equates to the correct v/v percentage for the use dilution. Ecolab also reformatted the Emergency Numbers, which is a non-notification change per PR Notice 98-10 (IV)(C). This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No  * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <hr/> If "Yes" Unit Packaging wgt.   No. per Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <hr/> If "Yes" Unit Package wgt.   No. Per Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
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3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 5, 15, 55 gallons and 300 gallon totes	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
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6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	
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**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application.)		
Name Brian C. Brosdahl	Title Senior Manager, Regulatory Affairs	Telephone No. (Include Area Code) (651) 293-2648

I certify that the statements which I have made on this form and all attachments are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Senior Manager, Regulatory Affairs	
3. Typed Name Brian C. Brosdahl	4. Date 5/3/03	

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# MANDATE PLUS

CIP Acid Sanitizer  
For Dairy & Food Processing Equipment

MANDATE PLUS is a non-iodine acid sanitizer for CIP and COP systems, tanks and back-flush systems

**ACTIVE INGREDIENTS:**

Nonanoic Acid ..... 6.30%  
Decanoic Acid ..... 1.09%

**INERT INGREDIENTS:** ..... 92.61%

**TOTAL:** ..... 100.0%

## KEEP OUT OF REACH OF CHILDREN DANGER

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER: CORROSIVE:** Causes irreversible eye damage or skin burns. Fatal if swallowed, inhaled or absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wear goggles or face shield(safety glasses). Wear protective clothing(long-sleeve shirt and long pants, socks plus shoes and chemical resistant gloves, such as water proof gloves). Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. 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 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.

**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 INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

FOR EMERGENCY MEDICAL INFORMATION IN USA OR CANADA,

CALL: 1-800-328-0026

FOR EMERGENCY MEDICAL INFORMATION WORLDWIDE,

CALL: 1-651-222-5352 (IN THE USA).

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.

#### ENVIRONMENTAL HAZARDS: (5 gallons or greater)

This product is toxic to fish. 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 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the U.S. Environmental Protection Agency.

**PHYSICAL AND CHEMICAL HAZARDS:** Mix only with water following label directions. Do not mix with chlorinated cleaners or sanitizers. Toxic chlorine gas will be formed.

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**DIRECTIONS FOR USE**

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

**For Dairy and Food Processing Equipment, Tanks, Vats, Pails, Pipelines and Closed Systems-**

Remove all gross food particles and soil by a pre-flush or pre-scrape, and when necessary, a presoak treatment. Clean all surfaces thoroughly with proper detergents and rinse with potable water. Sanitize CIP or COP equipment by immersion, circulation or coarse spray sanitizing techniques, as appropriate. For sanitizing by immersion or circulation, use MANDATE PLUS at 1.0 to 1.1 ounces per 6 gallons (1.30 to 1.43 mL per Liter) of water. For coarse spray sanitizing, use 0.9 to 1.0 ounces per 3 gallons (2.34 to 2.60 mL per Liter) of water. All surfaces should be exposed to sanitizing solutions for a period of not less than 2 minutes. Drain thoroughly and then air dry. Regular use of MANDATE PLUS at will prevent the formation of milkstone or mineral stone on processing equipment.

Follow state and local Health Department regulations for cleaning and sanitizing food processing and dairy equipment.

**Note:** For mechanical operations repeated use solutions may not be reused for sanitizing, but may be reused for other purposes such as cleaning.

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

**Pesticide Storage:** Keep container closed when not in use. Do not store below 0° F for extended periods.

**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.

(Tote): Verify that the tote is empty. Do not rinse or clean. Seal tote and contact Ecolab for return.

**Net Contents:**

1 U.S. gal (3.78 L)  
 5 U.S. gal (18.9 L)  
 15 U.S. gal (56.7 L)  
 55 U.S. gal (208.2 L)  
 300 U.S. gal (1,134 L)

EPA Reg. No. 1677-194

EPA Est.: 1677-IL-2 (J), 1677-NJ-1 (W), 1677-TX-1 (D), 1677-GA-1 (M), 1677-CA-1 (S), 1677-MN-1 (P), 1677-PR-1 (B), 3798-CA-2 (T), 37982-CA-3 (A), 11321-CA-1 (C), 1677-OH-1 (H), 1677-CA-2 (R), 1677-MO-1 (K), 1677-WV-1 (V), 303-IN-1 (L)

Superscript refers to first letter of date code

Ecolab Inc., Food & Beverage Division  
 370 Wabasha Street N.  
 St. Paul, Minnesota 55102-1390 U.S.A