

1677-194

09/25/2012

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

September 25, 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms. Rhonda Schulz
Ecolab, Inc.
370 Wabasha Street North
St. Paul, Minnesota 55102-1390

Subject: **Mandate Plus**
EPA Registration No. 1677-194
Application Date: 07/27/2012
Receipt Date: 07/30/12

Dear Ms. Schulz:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable.

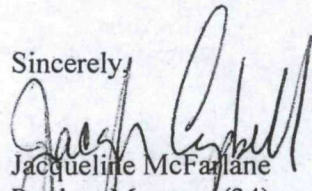
Proposed Amendment

- Secondary use dilution language
- Clarification of dosage instructions for CIP/COP equipment
- Optional marketing language and graphics

General Comments

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at carl.jaclyn@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline McFarlane
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

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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%

ACCEPTED
SEP 25 2012
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-194

**KEEP OUT OF REACH OF CHILDREN
DANGER**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE: Causes irreversible eye damage or skin burns. May be fatal if absorbed through skin. Harmful if swallowed or inhaled. 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, using tobacco, or using the toilet. 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 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 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.

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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.

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 at a concentration of 0.5 to 1.0 ounces per 3 gallons (1.30 to 2.6 mL per Liter, 1300 to 2600 ppm) of water. At this dilution MANDATE PLUS is effective against *Staphylococcus aureus* (ATCC 6538) and *Escherichia coli* (ATCC 11229). Sanitize CIP or COP equipment by immersion, circulation or coarse spray sanitizing techniques, as appropriate. Expose all surfaces to sanitizing solutions for a period of not less than 2 minutes. Drain thoroughly and then air dry. Regular use of MANDATE PLUS will prevent the formation of milk stone 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: Store in a cool, dark, dry place in original container. Always replace covers. 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:

(< 55 gallons Rigid Nonrefillable Container and Non Returnable Tote): Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Offer for recycling, if available, or discard in trash.

(Returnable 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), 3798-CA-2 (T), 37982-CA-3 (A), 11321-CA-1 (C), 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

SECONDARY/USE DILUTION CONTAINER LABEL

(Note to reviewer: This secondary/use dilution container label will be used only when the product is diluted at 1 oz or less per 3 gallons of water. Other dilutions must use concentrate signal word and precautionary statements from page 1.)

MANDATE PLUS

(Concentrate Ingredient Statement)

Active Ingredients:	
Nonanoic Acid.....	6.30%
Decanoic Acid.....	1.09%
Other Ingredients:	<u>92.61%</u>
Total:	100.0%

The product in this container must be diluted at the use rate of 1 oz or less per 3 gallons of water as directed on the concentrate product label.

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Follow the directions for use on the concentrate label when applying this product.

EPA Reg. No. 1677-194

The following is considered optional marketing language:

PRODUCT DESCRIPTION

- ▲ Mandate Plus is designed for automated CIP systems.

BENEFITS

Saves Money

- ▲ Non-corrosive to hard surfaces at suggested use dilution.

Saves Time and Labor

- ▲ Sheeting action provides spotless, film-free, sanitary equipment.
- ▲ Performs acid rinse and sanitizing in one step.
- ▲ Low-foaming formula enables effective CIP flow.

Mandate Plus label

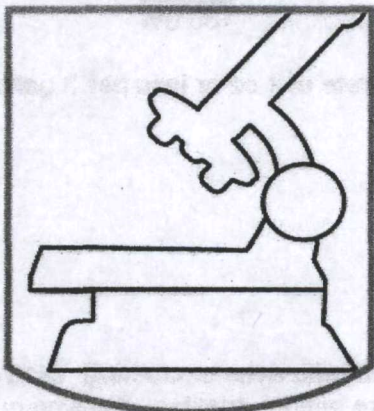
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Promotes Quality Assurance

- ▲ The non-corrosive formula enables its use on hard, non-porous food contact surfaces.
- ▲ Remains soluble in use solution for long periods of time.
- ▲ Leaves equipment surfaces shining – mixture of anionic and nonionic surfactants provide better wetting and rinsing.
- ▲ Ideal for CIP application where a separate sanitizing step is difficult or impossible.

Environmental Implications

- ▲ Low phosphate level.
 - ▲ Product contains no iodine, chlorine, quats.
 - ▲ Sanitizes during the acid rinse cycle, reducing water volume and related changes during clean-up.
- See side/back panel for First Aid...



Sanitizer
Desinfectante