

1677-223

10/29/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 29 2009

Ms. Rhonda K Schulz  
Associate Director, Regulatory Affairs  
Ecolab Inc.  
370 Wabasha Street N  
St. Paul, MN 55102

Subject: **Sani-Step**  
EPA Registration Number 1677-223  
Letter Dated June 2, 2009  
EPA Receive Date June 10, 2009

Dear Ms. Schulz:

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with comments.

**Proposed Amendment:**

- Update Storage and Disposal
- Add ATCC numbers to the organism
- Add metric units and Canadian (NAFTA)
- Precautionary Statement

**Chemistry Review:**

The product chemistry is acceptable.

**Labeling:**

1. Revise the "PRECAUTIONARY STATEMENT" to read as follows:

Keep Out Of Reach of Children

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

2025

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS:** Caution: causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco or using the toilet.

2. Revise the **"FIRST AID"** read as follows:

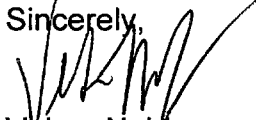
**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes.  
Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing.  
Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison Center, doctor, or going for treatment. For emergency information Concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: [www.npic.orst.edu](http://www.npic.orst.edu))

**General Comments:**

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224 or Velma Noble at (703) 308-6233.

Sincerely,



Velma Noble  
Product Manager (31)  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

Enclosure: Product Chemistry review approval Dated 9/17/09 and Product Chemistry Review 9/2/09

3085

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

# SANI-STEP

**OCT 29 2009**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 1677-223

**Solid, Time-Released, Floor Sanitizer**  
**For Use in Dairy, Food and Beverage Processing Industries**  
**FOR INDUSTRIAL USE ONLY**

### ACTIVE INGREDIENTS:

Alkyl (C <sub>14</sub> , 50% C <sub>12</sub> , 40% C <sub>16</sub> , 10%)	
Dimethyl benzyl ammonium chloride.....	0.479%
Octyl decyl dimethyl ammonium chloride.....	0.359%
Didecyl dimethyl ammonium chloride.....	0.215%
Diocetyl dimethyl ammonium chloride.....	0.144%
<b>OTHER INGREDIENTS:</b> .....	<u>98.803%</u>
<b>TOTAL:</b> .....	<b>100.00%</b>

## KEEP OUT OF REACH OF CHILDREN CAUTION

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** ~~Corrosive.~~ Causes skin burns and moderate eye irritation. Do not get in eyes, on skin or on clothing. Wear protective eyewear, clothing and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

#### FIRST AID

**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 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.

**FOR EMERGENCY MEDICAL INFORMATION IN THE US AND CANADA, CALL TOLL-FREE 1-800-328-0026**

**OUTSIDE OF UNITED STATES AND CANADA CALL: 1-651-222-5352 (in USA)**

**~~OUTSIDE OF NORTH AMERICA, CALL 1-651-222-5352~~**

**ENVIRONMENTAL HAZARDS:** (only required for containers greater than 50 pounds) 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 you State Water Board or Regional Office of the EPA or local provincial government.

4085

SANI-STEP is a water activated, time-released, solid sanitizer specifically formulated to improve environmental sanitation on floors where wet conditions favor microorganism growth and cause sanitation concern.

**DIRECTIONS FOR USE**

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

After cleaning and sanitizing equipment, apply SANI-STEP evenly to the floor, at a rate of 1.2 grams – 2.4 grams per square foot (929 cm<sup>2</sup>). Product may be re-applied as needed during the production process. SANI-STEP does not become active until it comes in contact with moisture on the floor.

SANI-STEP has been evaluated at a concentration that supports a dilution of 5.1 oz/gallon (39.9ml/L) in the presence of 5% soil contamination and in waters up to 500 ppm hardness (29.2 gpg calculated as CaCO<sub>3</sub>). Treated surfaces must remain wet for 5 minutes.

SANI-STEP was evaluated using the Non-Food Contact Surface Sanitizer Test and was proven to be effective against the following organisms:

*Staphylococcus aureus* (ATCC 6538)  
*Escherichia coli* (ATCC 11229)  
*Salmonella enterica* (ATCC 13311)

*Enterobacter aerogenes* (ATCC 13048)  
*Listeria monocytogenes* (ATCC 49594)

**STORAGE & DISPOSAL**

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

**Pesticide Storage:** Store in a dry area.

**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:** Remove liner from drum and completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities.

For the outer drum, nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying.

5095

Net Contents: 300 lb (136.2 kg) 30 lb (13.6 kg)
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Made in USA

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

EPA Reg. No. 1677-223  
EPA Est.: 1677-MN-1 (P), 1677-CA-2 (R),  
1677-TX-1 (D), 1677-OH-1 (H)  
1677-IL-2 (J), 1677-PR-1 (B), 1677-CA-1 (S),  
1677-GA-1 (M), 1677-WV-1 (V)  
Superscript refers to first letter of date code

Distributed in Canada by Ecolab Co. Food & Beverage  
Distribué au Canada par Ecolab Co. Agroalimentaire et Breuvages  
Mississauga ON L4W 2X5  
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Sani-Step



**KEEP OUT OF THE REACH OF CHILDREN.**

**CAUTION:** Causes-moderate eye irritation. Do not get in eyes, on skin or on clothing. Wear protective eyewear, clothing and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

**First Aid:**

**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 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.

**SEE MATERIAL SAFETY DATA SHEET FOR THIS PRODUCT**

**EMERGENCY HEALTH INFORMATION: 1-800-328-0026**

**OUTSIDE OF UNITED STATES AND CANADA CALL: 1-651-222-5352 (in USA)**

*French Text (to be added)*

Ecolab Co. Food & Beverage