

1677-223

5/2/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY -2 2012

Rhonda Schulz  
Director, Product Registration & Compliance  
Ecolab Inc.  
370 N. Wabasha Street  
St. Paul, MN 55102

Subject: **Sani-Step**  
EPA Registration Number 1677-223  
Application Dated April 5, 2012  
EPA Received Date April 10, 2012

Dear Mr. Schulz:

This will knowledge receipt of your notification, submitted under the provisions of FIFRA section 3c 9. Based on a review of the submitted material the following comment apply.

**Proposed Amendment:**

- Add optional marketing language and graphic, French text and a Canadian address

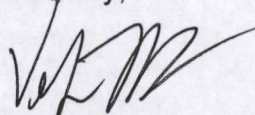
**General Comments:**

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

The notification 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 Drusilla Copeland at (703) 308-6224.

Sincerely,



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

SYMBOL								
SURNAME								
DATE								



2097

 <p>United States <b>Environmental Protection Agency</b> Washington, DC 20460</p>	<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;">1677-223</p>	2. EPA Product Manager  <p style="text-align: center;">Velma Noble</p>	3. Proposed Classification  <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
3. Company/Product (Name)  <p style="text-align: center;">Sani-Step</p>	PM#  <p style="text-align: center;">31</p>	
5. Name and Address of Applicant (Include ZIP Code) <b>Ecolab Inc.</b> <b>370 N. Wabasha Street</b> <b>St. Paul, MN 55102</b>  <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"/> Resubmission in response to Agency letter dated _____  <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to _____  <input type="checkbox"/> "Me Too" Application.  <input type="checkbox"/> Other - Explain below.
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**Explanation:** Use additional Page(s) if necessary. (For section I and Section II)  
 This label notification per PRN 98-10 is a request to add optional marketing language and graphic, French text and a Canadian address for EPA Reg. No. 1677-223. All changes are highlighted in red.

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 EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 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**

<b>1. Material This Product Will Be Packaged In:</b>			
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 If "Yes" Unit Packaging wgt.      No. per Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Package wgt.      No. Per Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic lined <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information  <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container  <p style="text-align: center;">30, 300 lb fiber drum</p>	5. Location of Label Directions  <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
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 _____			

**Section - IV**

<b>1. Contact Point</b> (Complete items directly below for identification of individual to be contacted if necessary to process this application.)		
Name <p style="text-align: center;">Rhonda Schulz</p>	Title <p style="text-align: center;">Director, Product Registration &amp; Compliance</p>	Telephone No. (Include Area Code) <p style="text-align: center;">(651) 293-4026</p>
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 <p style="text-align: center;">(Stamped)</p>
2. Signature 	3. Title <p style="text-align: center;">Director, Product Registration &amp; Compliance</p>	
3. Typed Name <p style="text-align: center;">Rhonda Schulz</p>	4. Date <p style="text-align: center;">4/15/12</p>	





Rhonda Schulz  
DIRECTOR - PRODUCT  
REGISTRATION & COMPLIANCE

T 651 293 4026  
F 651 225 3122

370 WABASHA STREET NORTH  
EUC 9  
ST. PAUL, MN 55102-1390  
Rhonda.Schulz@ecolab.com

April 5, 2012

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

ATTN: Velma Noble, PM-31

**Re: Sani-Step, EPA Reg. No. 1677-223**

Dear Ms. Noble:

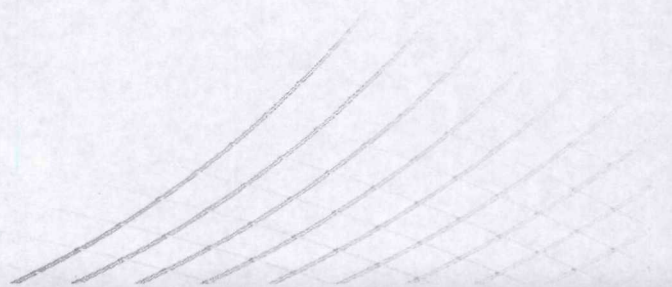
Ecolab Inc. is submitting a notification per PRN 98-10 to add optional marketing language and graphic, French text and a Canadian address for EPA Reg. No. 1677-223. All changes are highlighted in red.

If you have any questions, please do not hesitate to contact me directly at the above listed number or email address.

Sincerely,

Rhonda Schulz  
Director - Product Registration & Compliance  
Law & Regulatory

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# SANI-STEP

**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> .....	<b>98.803%</b>
<b>TOTAL:</b> .....	<b>100.00%</b>

**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. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**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.

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

**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)**

NOTIFICATION  
Date Reviewed: 1/26/12  
Reviewed By: DE

**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.



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.



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Net Contents:  
300 lb (136.2 kg)  
30 lb (13.6 kg)

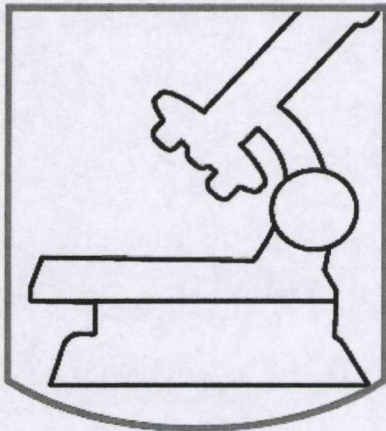
Made in USA/Fabriqué aux É-U

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

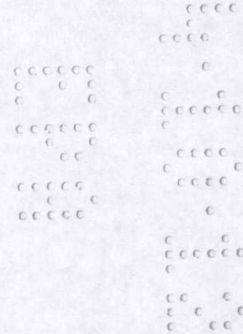
EPA Reg. No. 1677-223  
EPA Est.: 1677-MN-1 (P), 1677-CA-2 (R),  
1677-TX-1 (D), 1677-OH-1 (H),  
1677-IL-2 (J), ~~1677-PR-1 (B)~~, 1677-CA-1 (S),  
1677-GA-1 (M), 1677-WV-1 (V)  
Superscript refers to first letter of date code

Optional marketing language:

- "See side/back panel for First Aid..."
- 



Sanitizer  
Desinfectante





Distributed in Canada by Ecolab Co. Food & Beverage  
Distribué au Canada par Ecolab Co. Agroalimentaire et Breuvages  
5105 Tomken Rd Mississauga ON L4W 2X5  
All Rights Reserved /Tous droits réservés

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