

1677-236

11-15-2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Theodore D. Head
Sr. Mnager, Product Registration & Compliance
Ecolab Inc.
370 N. Wabasha Street
St. Paul, MN 55102

NOV 15 2011

Subject: **RAC 100BL**
EPA Registration Number 1677-236
Notification Application Dated October 25, 2011
EPA Received Date October 31, 2011

Dear Mr. Head:

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:

- Revise the nonporous surface area coverage from 450-750 ft (11.0 – 18.4 M per Liter) to 300-600 ft (7.5 – 15.0 M)
- Remove "while it is not in services" from the on-food contact sanitizing directions for use for

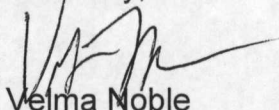
General Comments:

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							



United States
Environmental Protection Agency
 Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1677-236	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
3. Company/Product (Name) RAC 100BL	PM# 31	
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. Expedited Review. 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 checked="" 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)

Label notification to revise the nonporous surface area coverage from 450-750 ft² (11.0 – 18.4 M² per Liter) to 300-600 ft² (7.5 – 15.0 M²) and also remove "while it is not in service" from the non-food contact sanitizing directions for use for EPA Reg. No. 1677-236.

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

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 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 <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	3. Size(s) Retail Container 1, 2.5, 4.5, 30, 50 gallons	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

1. Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)

Name Theodore D. Head	Title Sr. Manager, Product Registration & Compliance	Telephone No. (Include Area Code) (651) 293-2484
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Certification

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.

2. Signature 	3. Title Sr. Manager, Product Registration & Compliance	6. Date Application Received (Stamped) _____
4. Typed Name Theodore D. Head	5. Date 10-25-11	



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Theodore Head
SENIOR MANAGER - PRODUCT
REGISTRATION AND
COMPLIANCE - EPA

T 651 293 2848
F 651 225 3122

370 WABASHA STREET NORTH
ST. PAUL, MN 55102-1390
Ted.Head@ecolab.com

October 25, 2011

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

ATTN: Velma Nobel, PM-31

Re: RAC 100BL, EPA Reg. No. 1677-236

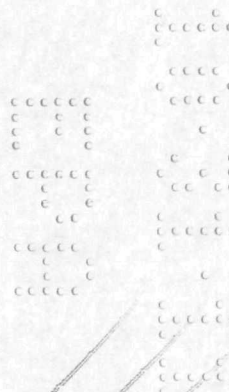
Dear Ms. Nobel:

Ecolab, Inc. is submitting a label notification to revise the nonporous surface area coverage from 450-750 ft² (11.0 – 18.4 M² per Liter) to 300-600 ft² (7.5 – 15.0 M²) and also remove the language "while it is not in service" from the non-food contact sanitizing directions for use. The revisions 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,

Theodore D. Head
Sr. Manager
Product Registration and Compliance



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RAC 100BL

REMOVABLE ANTIMICROBIAL COATING

RESIDUAL-SANITIZING · BACTERICIDAL · FUNGISTATIC

· MILDEWSTATIC

Active Ingredients:

n-Alkyl (50% C14, 40% C12, 10% C16) Dimethyl Benzyl Ammonium Chloride.....	0.06%
Di-n-Octyl Dimethyl Ammonium Chloride.....	0.0225%
Di-n-Decyl Dimethyl Ammonium Chloride.....	0.0225%
n-Octyl Decyl Dimethyl Ammonium Chloride.....	0.045%
Other Ingredients.....	<u>99.85%</u>
Total	100.000%

KEEP OUT OF REACH OF CHILDREN DANGER

PRECAUTIONARY STATEMENTS

DANGER: Causes irreversible eye damage. Harmful if inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wear goggles, face shield or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing 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: 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 mouth-to-mouth if possible

FOR EMERGENCY MEDICAL INFORMATION, CALL TOLL-FREE 1-800-328-0026

OUTSIDE NORTH AMERICA, CALL 1-651-222-5352

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.

NOTIFICATION
Date Reviewed: 11/14/17
Reviewed By: p.c.

DIRECTIONS FOR USE:

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

Not intended for food contact surfaces. If a food-contact surface is accidentally sprayed rinse with potable water until the coating is visibly removed before the surface comes into contact with food. If RAC 100BL is applied to food processing equipment it must be removed prior to processing. Rinse equipment with potable water until the coating is visibly removed follow rinse with an approved no-rinse food contact sanitizer.

During application of the coating, misting can occur. Inhalation of such aerosols should be avoided. Wearing a disposable filtering half mask (EN 149, filter class FFP1 or higher) is required.

Non-food contact sanitizing

RAC 100BL sanitizes hard nonporous, non-food contact surfaces such as walls, ceilings, exterior HVAC surfaces, trailers and food processing equipment ~~while it is not in service~~ in dairy, meat, poultry, brewery, beverage and other food processing facilities. RAC 100BL is effective as a non-food contact sanitizer against the following organisms: *Staphylococcus aureus* (ATCC 6538), *Klebsiella pneumoniae* (ATCC 4352), *Listeria monocytogenes* (ATCC 49594), *Escherichia coli* O157:H7 (ATCC 43895), and *Salmonella typhimurium* (ATCC 13311).

Prior to use of this product as a non-food contact sanitizer, remove gross soils and particles from surfaces. Wash with a recommended detergent solution and rinse thoroughly with potable water.

Apply RAC 100BL as received, do not dilute. Apply using spray equipment, brush, roller, or pad as recommended by Ecolab. Do not breathe spray. Apply to non-food contact surfaces such that all desired surfaces are visibly coated. One gallon of RAC 100BL will cover ~~450-750 ft² (11.0 — 18.4 M² per Liter)~~ 300-600 ft² (7.5 — 15.0 M²). Ensure sufficient coverage on all surfaces. Surfaces should be exposed to the sanitizing coating for a period of not less than 5 minutes. No rinsing is necessary.

Residual [non-food contact] sanitizing

RAC 100BL provides residual sanitizing activity for up to 30 days on hard nonporous, non-food contact surfaces such as walls, ceilings, exterior HVAC surfaces, trailers and food processing equipment ~~while it is not in service~~ in dairy, meat poultry, brewery, beverage and other food processing facilities. Once RAC 100 BL has been applied do not disturb the coating, avoid frequent touching and abrasions. RAC 100BL has residual non-food contact sanitizing activity in 5 minutes on pre-cleaned, hard, nonporous, inanimate surfaces against: *Staphylococcus aureus* (ATCC 6538), *Klebsiella pneumoniae* (ATCC 4352), *Listeria monocytogenes* (ATCC 49594), *Escherichia coli* O157:H7 (ATCC 43895), and *Salmonella typhimurium* (ATCC 13311).

Prior to use of this product as a residual sanitizer, remove gross soils and particles from surfaces. Wash with a recommended detergent solution and rinse thoroughly with potable water. For best results allow surface to dry thoroughly before applying RAC 100BL.

Apply RAC 100BL as received, do not dilute. Apply using spray equipment, brush, roller, or pad as recommended by Ecolab. Do not breathe spray. Apply to non-food contact surfaces such that all desired surfaces are visibly coated. Ensure sufficient coverage. For residual sanitizing activity do not remove coating, allow coating to air dry. [For continuous residual sanitizing, remove coating and reapply every 30 days.]

Reapply RAC 100BL if the coating is visibly absent, disrupted or frequently touched. If RAC 100BL coating becomes visibly soiled, remove coating and gross soils and particles from surfaces. The surface may need to be cleaned and/or sanitized prior to additional applications of the product. Wash with a recommended detergent solution, rinse thoroughly with potable water and allow surface to dry; then reapply RAC 100BL.

Avoid applications in areas with excessive water overspray or standing water. Avoid manual scrubbing or abrasion to include frequent touching of the coated surfaces and aqueous cleaning products to maintain residual sanitizing since these may remove the coating. One gallon of RAC 100BL will cover ~~450-750 ft² (11.0 — 18.4 M² per Liter)~~ 300-600 ft² (7.5 — 15.0 M²).

Note to reviewer language in [brackets] is considered optional.

Fungistatic Control

RAC 100BL is ready to use and will effectively inhibit the growth of molds for up to 30 days when applied to hard non-porous surfaces and up to 14 days for porous surfaces in dairy, meat, poultry, brewery, beverage and other food processing facilities.

Prior to use of this product for fungistatic control, remove gross soils and particles from surfaces. Wash with a recommended detergent solution and rinse thoroughly with potable water. For best results allow surface to dry thoroughly before applying RAC 100BL.

Apply RAC 100BL as received, do not dilute. Apply using spray equipment, brush, roller, or pad as recommended by Ecolab. Do not breathe spray. Apply to non-food contact surfaces such that all desired surfaces are visibly coated.

For nonporous surfaces apply at a rate of one gallon of RAC 100BL per 450-750 ft² (11.0 – 18.4 M² per Liter) 300-600 ft² (7.5 – 15.0 M²).

Porous surfaces may require multiple coats to achieve the recommended coverage of 75-150 ft² RAC 100BL per gallon (1.8 – 3.7 M² per Liter) for fungistatic control. Allow coating to dry between applications

A residual fungistatic coating is obtained after the product is allowed to air dry on the surface. [For continuous fungistatic control, remove coating and reapply every 30 days for non-porous surfaces and every 15 days for porous surfaces]

Reapply RAC 100BL if the coating is visibly absent ,disrupted or frequently touched. Avoid applications in areas with excessive water overspray or standing water. Avoid manual scrubbing or abrasion to include frequent touching of the coated surfaces and aqueous cleaning products since these may remove the coating.

Surface[s] [Materials]:

RAC 100BL is formulated for use on including but not limited to the following surfaces:

aluminum	[finished] floors	plastic and painted surfaces
baked enamel surfaces	glass	plastic surfaces
glazed ceramic tile	glazed porcelain	stainless steel
chrome	laminated surfaces	vinyl
corian	metal surfaces	formica
linoleum	sealed fiberglass	
marlite	granite	

Removal of coating:

The dried RAC 100BL coating can be removed by water rinse or peeling . For best results wet RAC 100BL coated surfaces with warm potable water (80-110°F, 27-43°C); allow wetted coating to stand 1-5 minutes, then rinse well with warm potable water (80-110°F, 27-43°C) until the coating is visibly removed. RAC 100BL coating can also be removed using cold water, but may require additional time and water to fully remove. Wear eye protection when removing the dried RAC 100BL coating.

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PESTICIDE STORAGE: Do not store above 120 deg. F. Keep from freezing. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used must be diluted with water before disposal in a sanitary sewer.

CONTAINER DISPOSAL: (≤ 55-gallons rigid) Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. To clean the container before final disposal, empty the remaining contents from this container into appropriate container. Fill the container about 10 percent full with water. Agitate vigorously for 2 minutes. Dispose of rinsate according to local regulations. Repeat this rinsing procedure two more times. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill or by incineration.

Net Contents:
1 U.S. Gal. (3.78 L)
2.5 U.S. Gal (9.46 L)
5 U.S. Gals. (18.9 L)

EPA Reg. No. 1677-236
EPA Est. No.

FOR USE IN

Bakeries, Dairies, Canneries, Food Handling Area, Food Service, Food Marketing and Storage, Food Processing (Meat, Seafood, Poultry, Fruit, Mushroom, Sugar, Oil, Nut), Ready-To-Eat Meat Processing Plants, Bottlers, Feed Mills, Wineries, Breweries.

[Residual Antimicrobial Coating]
[Renewable Antimicrobial Coating]

Note to reviewer language in [brackets] is considered optional.