1677-185 05/14/2010 1/11

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

MAY 14 2010

Attention: Theodore Head
Regulatory Specialist

Subject: Environ San
EPA Reg. No. 1677-185
Amendment Letter Dated December 21, 2010

The following amendment, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided the following label revisions are incorporated:

- The Storage and Disposal section must be revised. The following language must be incorporated:

  - **FOR USE ON NON-REFILLABLE CONTAINERS WITH INDUSTRIAL/COMMERCIAL/INSTITUTIONAL - PUBLIC HEALTH USES** *N*on-refillable container. Do not reuse this container to hold materials other than pesticides or diluted pesticides (rinsate). -Offer for recycling for available or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

  - **RESIDUE REMOVAL INSTRUCTIONS: For containers less than 5 gallons** Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Fill container 1/4 full with water and recap. Shake 10 seconds. Follow Pesticide Disposal instructions for rinsate disposal. Drain for 10 seconds after the flow begins to drip. Repeat procedure two more times.

  - **RESIDUE REMOVAL INSTRUCTIONS: For containers greater than 5 gallons** Triple rinse container (or equivalent) promptly after emptying. Triple rinseas follows: Fill container 1/4 full with water. Tip container on its side and roll it back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over its other end and tip it back and forth several times. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times.

  - **RESIDUE REMOVAL INSTRUCTIONS: For containers less than 5 gallons**

Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: empty the remaining contents into application equipment or a mix tank and drain 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

- **RESIDUE REMOVAL INSTRUCTIONS: For containers greater than 5 gallons** Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures.Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) and section 4(a) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the accepted labeling is enclosed. Submit three copies of your final printed labeling to the Agency before distributing or selling the product bearing the revised labeling.

If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062.

Sincerely,

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510C)

Enclosures:

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ENVIRO SAN

COMMERCIAL STERILANT FOR ASEPTIC PACKAGING OF FOODS

COMMERCIAL STERILANT FOR ASEPTIC MANUFACTURING AND PACKAGING EQUIPMENT FOR FOOD PROCESSING

SANITIZER FOR PRECLEANED SURFACES

ACCEPTED
with COMMENTS
EPA Letter Dated:
MAY 14 2010
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-185

Active Ingredients:	
Hydrogen Peroxide	11.2%
Peroxyacetic Acid	15.2%
Inert Ingredients	73.6%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE: Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wear protective eyewear (goggles, face shield, or safety glasses), protective clothing and rubber gloves. Wash thoroughly after handling with soap and water, and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse. Wear a mask or pesticide respirator jointly approved by Mine Safety and Health Administration and the National Institute for Occupational Safety and Health.

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.

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.

PHYSICAL AND CHEMICAL HAZARDS: Strong oxidizing agent. Corrosive. Do not use in concentrated form. Mix only with water according to label instructions. Never bring concentrate in contact with other sanitizers, cleaners or organic substances.

ENVIRONMENTAL HAZARDS: 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 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 your State Water Board or Regional Office of the EPA.

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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.

COMMERCIAL STERILIZATION

ENVIRO SAN can be used in food processing aseptic packaging systems as a commercial sterilant to treat clean, non-porous food packaging materials and equipment. This product is effective as a commercial sterilant alone or in conjunction with *ES-1000* or ES-2000 when the solution is prepared in water of up to 500 ppm hardness. Refer to Directions for Use to determine the suitable application with alternative concentrations and contact times. Where a minimum concentration is specified in the use instructions a test kit or titration method is recommended for verifying that the appropriate concentration is maintained.

COMMERCIAL STERILIZATION OF FOOD PACKAGING MATERIALS

Enviro San with ES-1000 at 60°C

Commercially sterilize clean, non-porous food packaging materials with a concentration of 5.0 ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (6597 ppm peroxyacetic acid by weight) and 0.2 ounces of ***ES-1000*** concentrate per 1.0 gallon of water (1500 ppm by weight) at a temperature of 60 - 70°C. Sterilization solution must be maintained at a minimum of 4100 ppm peroxyacetic acid and 1000 ppm ES-1000. For example, in one gallon of water add 5.0 ounces of ***Enviro San*** and 0.2 ounces of ***ES-1000***. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the food packaging material. Surfaces should be exposed to the solution for a period of not less than 19 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus cereus, Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness.

Enviro San with ES-1000 at 50°C

Commercially sterilize clean, non-porous food packaging materials with a concentration of **3.7** ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water **(4838** ppm peroxyacetic acid by weight) and 0.2 ounces of ***ES-1000*** concentrate per 1.0 gallon of water (1500 ppm by weight) at a temperature of **50 - 60°C.** Sterilization solution must be maintained at a minimum of **3000 ppm** peroxyacetic acid and 1000 ppm ES-1000. For example, in one gallon of water add 3.7 ounces of ***Enviro San*** and 0.2 ounces of ***ES-1000***. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the food packaging material. Surfaces should be exposed to the solution for a period of not less than **40 seconds** unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus cereus, Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness.

Enviro San alone at 60°C

Commercially sterilize clean, non-porous food packaging materials with a concentration of 5.0 ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (6597 ppm peroxyacetic acid by weight) at a temperature of 60°C - 70°C. Sterilization solution must be maintained at a minimum of 4100 ppm peroxyacetic acid. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the food packaging material. Surfaces should be exposed to the solution for a period of not less than 19 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected

water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness.

Enviro San alone at 50°C

Commercially sterile clean, non-porous food packaging materials with a concentration of 3.7 ounces of Enviro San concentrate per 1.0 gallon of water 4838 ppm peroxyacetic acid by weight) at a temperature of 50 - 60°C. Sterilization solution must be maintained at a minimum of 3000 ppm peroxyacetic acid. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the food packaging material. Surfaces should be exposed to the solution for a period of not less than 40 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus subtilis* and *Clostridium sporogenes.*

Enviro San with ES-2000 at 50°C (4000 ppm POAA)

Commercially sterilize clean, non-porous food packaging materials with a concentration of 5.0 ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (6597 ppm peroxyacetic acid by weight) and 0.01 ounces of ES-2000 concentrate per 1.0 gallon of water (100 ppm by weight) at a temperature of 50°C. Sterilization solution must be maintained at a minimum of 4000 ppm peroxyacetic acid and a maximum of 500 ppm H_2O_2. ES-2000 should be added to the recirculating system to achieve 500 ppm H_2O_2 or less and not to exceed 650 ppm ES-2000. For example, in one gallon of water add 5.0 ounces of ***Enviro San*** and 0.01 ounces of ES-2000. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the food packaging material. Surfaces should be exposed to the solution for a period of not less than 15 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus cereus, Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness.

Enviro San with ES-2000 at 50°C (3000 ppm POAA)

Commercially sterilize clean, non-porous food packaging materials with a concentration of 3.7 ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (4838 ppm peroxyacetic acid by weight) and 0.01 ounces of ES-2000 concentrate per 1.0 gallon of water (100 ppm by weight) at a temperature of 50°C. Sterilization solution must be maintained at a minimum of 3000 ppm peroxyacetic acid and a maximum of 500 ppm H_2O_2. ES-2000 should be added to the recirculating system to achieve 500 ppm H_2O_2 or less and not to exceed 650 ppm ES-2000. For example, in one gallon of water add 3.7 ounces of ***Enviro San*** and 0.01 ounces of ES-2000. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the food packaging material. Surfaces should be exposed to the solution for a period of not less than 35 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus*

cereus, Bacillus subtilis, and *Clostridium sporogenes* in water up to 500 ppm hardness.

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAY 14 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-185

The alternative concentrations and conditions for commercial sterilization of food packaging materials described above are summarized in the following table:

	(Enviro San + ES-1000 at 60°C)	Enviro San + ES-1000 at 50°C	Enviro San alone at 60°C	Enviro San alone at 50°C	Enviro San + ES-2000 at 50°C	Enviro San + ES-2000 at 50°C
Prepare solution:						
Enviro San (oz/gallon)	5.0	3.7	5.0	3.7	5.0	3.7
Enviro San (POAA by weight)	6597	4838	6597	4838	6597	4838
ES-1000 (oz/gallon)	0.2	0.2	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)
ES-1000 (ppm by weight)	1500	1500	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)
ES-2000 (oz/gallon)	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)	0.01	0.01
ES-2000 (ppm by weight)	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)	100	100
Temperature (°C)	60-70	50-60	60-70	50-60	50-60	50-60
Sterilizing solution must be maintained at:						
POAA concentration (ppm)	4100	3000	4100	3000	4000	3000
ES-1000 concentration (ppm)	1000	1000	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)
H_2O_2 concentration (ppm)	>3000	>2200	>3000	>2200	<500	<500
ES-2000 concentration (ppm)	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)	As needed to achieve <500 ppm H_2O_2, not to exceed 650 ppm ES-2000	As needed to achieve <500 ppm H_2O_2, not to exceed 650 ppm ES-2000
Contact time (seconds)	19	40	19	40	15	35
Effective against the following organisms	*Bacillus cereus* *Bacillus subtilis* *Clostridium sporogenes*	*Bacillus cereus* *Bacillus subtilis* *Clostridium sporogenes*	*Bacillus subtilis* *Clostridium sporogenes*	*Bacillus subtilis* *Clostridium sporogenes*	*Bacillus cereus* *Bacillus subtilis* *Clostridium sporogenes*	*Bacillus cereus* *Bacillus subtilis* *Clostridium sporogenes*

ACCEPTED
with COMMENTS
EPA Letter Dated:

4 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-185

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This product may be used to sterilize food packaging materials for aseptic packaging of low acid foods that has a schedule process accepted by FDA. The aseptic food processing operation must comply with all applicable FDA regulations, including, but not limited to, 21 CFR parts 108, 110, 113, and/or 114. Use in an aseptic food processing operation includes testing required for the process validation.

COMMERCIAL STERILIZATION OF MANUFACTURING, FILLING, AND PACKAGING EQUIPMENT FOR FOOD PROCESSING

ENVIRO SAN can be used to sterilize manufacturing equipment such as pipelines, pumps, tanks, vats, fillers, evaporators, and pasteurizers. Refer to the equipment manufacturer's instructions to determine how to sterilize the equipment in place or to disassemble the equipment for sterilization by immersion. It is suitable for use on equipment or surfaces composed of glazed porcelain, plastic (such as polypropylene and polyethylene), stainless steel, or glass.

Enviro San with ES-1000 at 60°C

Prior to use of this product, remove gross soil particles from equipment surfaces, thoroughly clean surfaces, and follow with a potable water rinse. Commercially sterilize clean manufacturing, filling, and packaging equipment with a concentration of 5.0 ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (6597 ppm peroxyacetic acid by weight) and 0.2 ounces of ***ES-1000*** concentrate per 1.0 gallon of water (1500 ppm by weight) at a temperature of 60 - 70°C. Sterilization solution must be maintained at a minimum of 4100 ppm peroxyacetic acid and 1000 ppm ES-1000. For example, in one gallon of water add 5.0 ounces of ***Enviro San*** and 0.2 ounces of ***ES-1000***. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the equipment. Surfaces should be exposed to the solution for a period of not less than 19 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus cereus, Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness.

Enviro San with ES-1000 at 50°C

Prior to use of this product, remove gross soil particles from equipment surfaces, thoroughly clean surfaces, and follow with a potable water rinse. Commercially sterilize clean manufacturing, filling, and packaging equipment with a concentration of 3.7ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (4838 ppm peroxyacetic acid by weight) and 0.2 ounces of ***ES-1000*** concentrate per 1.0 gallon of water (1500 ppm by weight) at a temperature of 50 - 60°C. Sterilization solution must be maintained at a minimum of 3000 ppm peroxyacetic acid and 1000 ppm ES-1000. For example, in one gallon of water add 3.7 ounces of ***Enviro San*** and 0.2 ounces of ***ES-1000***. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the equipment. Surfaces should be exposed to the solution for a period of not less than 40 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus cereus, Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness

ACCEPTED
EPA Letter Dated:
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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-185

Enviro San alone at 60°C

Prior to use of this product, remove gross soil particles from equipment surfaces, thoroughly clean surfaces, and follow with a potable water rinse. Commercially sterilize clean manufacturing, filling, and packaging equipment with a concentration of 5.0 ounces of ***ENVIRO***

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SAN concentrate per 1.0 gallon of water (6597 ppm peroxyacetic acid by weight) at a temperature of 60 - 70°C. Sterilization solution must be maintained at a minimum of 4100 ppm peroxyacetic acid. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the equipment. Surfaces should be exposed to the solution for a period of not less than 19 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness

Enviro San alone at 50°C

Prior to use of this product, remove gross soil particles from equipment surfaces, thoroughly clean surfaces, and follow with a potable water rinse. Commercially sterilize clean manufacturing, filling, and packaging equipment with a concentration of 3.7 ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (4838 ppm peroxyacetic acid by weight) at a temperature of 50 - 60°C. Sterilization solution must be maintained at a minimum of 3000 ppm. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the equipment. Surfaces should be exposed to the solution for a period of not less than 40 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness

Enviro San with ES-2000 at 50°C (4000 ppm POAA)

Commercially sterilize clean, non-porous food packaging materials with a concentration of 5.0 ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (6597 ppm peroxyacetic acid by weight) and 0.01 ounces of ES-2000 concentrate per 1.0 gallon of water (100 ppm by weight) at a temperature of 50°C. Sterilization solution must be maintained at a minimum of 4000 ppm peroxyacetic acid and a maximum of 500 ppm H_2O_2. ES-2000 should be added to the recirculating system to achieve 500 ppm H_2O_2 or less and not to exceed 650 ppm ES-2000. For example, in one gallon of water add 5.0 ounces of ***Enviro San*** and 0.01 ounces of ES-2000. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the food packaging material. Surfaces should be exposed to the solution for a period of not less than 15 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus cereus, Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness.

Enviro San with ES-2000 at 50°C (3000 ppm POAA)

Commercially sterilize clean, non-porous food packaging materials with a concentration of 3.7 ounces of ***ENVIRO SAN*** concentrate per 1.0 gallon of water (4838 ppm peroxyacetic acid by weight) and 0.01 ounces of ES-2000 concentrate per 1.0 gallon of water (100 ppm by weight) at a temperature of 50°C. Sterilization solution must be maintained at a minimum of 3000 ppm peroxyacetic acid and a maximum of 500 ppm H_2O_2. ES-2000 should be added to the recirculating system to achieve 500 ppm H_2O_2 or less and not to exceed 650 ppm ES-2000. For example, in one gallon of water add 3.7 ounces of ***Enviro San*** and 0.01 ounces of ES-2000. Use immersion, coarse spray or circulation techniques as appropriate to sterilize the food packaging material. Surfaces should be exposed to the solution for a period of not less than 35 seconds unless a longer time is specified by the governing food processing authority. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water. This product when used per label directions is effective against *Bacillus cereus, Bacillus subtilis,* and *Clostridium sporogenes* in water up to 500 ppm hardness.

ACCEPTED
With COMMENTS
In EPA Letter Dated:
MAY 14 2010

The alternative concentrations and conditions for commercial sterilization of manufacturing, filling and packaging equipment for food processing described above are summarized in the following table:

	(Enviro San + ES-1000 at 60°C)	Enviro San + ES-1000 at 50°C	Enviro San alone at 60°C	Enviro San alone at 50°C	Enviro San + ES-2000 at 50°C	Enviro San + ES-2000 at 50°C
Prepare solution:						
Enviro San (oz/gallon)	5.0	3.7	5.0	3.7	5.0	3.7
Enviro San (POAA by weight)	6597	4838	6597	4838	6597	4838
ES-1000 (oz/gallon)	0.2	0.2	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)
ES-1000 (ppm by weight)	1500	1500	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)
ES-2000 (oz/gallon)	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)	0.01	0.01
ES-2000 (ppm by weight)	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)	100	100
Temperature (°C)	60-70	50-60	60-70	50-60	50-60	50-60
Sterilizing solution must be maintained at:						
POAA concentration (ppm)	4100	3000	4100	3000	4000	3000
ES-1000 concentration (ppm)	1000	1000	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)
H_2O_2 concentration (ppm)	>3000	>2200	>3000	>2200	<500	<500
ES-2000 concentration (ppm)	N/A (zero)	N/A (zero)	N/A (zero)	N/A (zero)	As needed to achieve <500 ppm H_2O_2, not to exceed 650 ppm ES-2000	As needed to achieve <500 ppm H_2O_2, not to exceed 650 ppm ES-2000
Contact time (seconds)	19	40	19	40	15	35
Effective against the following organisms	*Bacillus cereus* *Bacillus subtilis* *Clostridium sporogenes*	*Bacillus cereus* *Bacillus subtilis* *Clostridium sporogenes*	*Bacillus subtilis* *Clostridium sporogenes*	*Bacillus subtilis* *Clostridium sporogenes*	*Bacillus cereus* *Bacillus subtilis* *Clostridium sporogenes*	*Bacillus cereus* *Bacillus subtilis* *Clostridium sporogenes*

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAY 14 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 11-77-185

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This product may be used for Aseptic Packaging of Low Acid Foods that has a scheduled process by FDA. The aseptic food processing operation must comply with all applicable FDA regulations, including, but not limited to, 21 CFR parts 108, 110, 113, and/or 114. Use in an aseptic food processing operation includes testing required for the process validation.

This product is not for use as a sterilant or high level disinfectant on medical devices.

SANITIZATION

ENVIRO SAN acid sanitizer is recommended for use on pre-cleaned surfaces such as equipment, pipelines, tanks, vats, fillers, evaporators, pasteurizers and aseptic equipment dairies, breweries, wineries, beverage and food processing plants. This product is effective as a sanitizer when solution is prepared in water of up to 500 ppm hardness.

SANITIZING FOOD CONTACT SURFACES

Prior to use of this product, remove gross soil particles from surfaces, thoroughly clean surfaces, and follow with a potable water rinse. Sanitize clean surfaces with a concentration of 0.10 – 0.18% v/v (1000 to 1800 ppm v/v or 1 to 1.8 ounces per 8 gallons of water) at room temperature. Use immersion, coarse spray or circulation techniques as appropriate to sanitize the surfaces. All surfaces should be exposed to the sanitizing solution for a period of not less than one minute unless otherwise specified by governing sanitary code. Allow surfaces to drain thoroughly and air dry. Do not rinse. This product when used per label directions is effective against *Staphylococcus aureus* and *Escherichia coli.*

SANITIZING NON-FOOD CONTACT SURFACES

Prior to use of this product, remove gross soil particles from surfaces, thoroughly clean surfaces, and follow with a potable water rinse. Sanitize clean surfaces with a concentration of 0.2 - 1.5% v/v (2000 to 15,000 ppm v/v or 2 oz. to 15 oz. per 8 gallons of water) at a temperature of 25 to 45 °C. Use immersion, coarse spray or circulation techniques as appropriate to sanitizer the surfaces. All surfaces should be exposed to the sanitizing solution for a period of not less than five minutes unless otherwise specified by governing sanitary code. Allow surfaces to drain thoroughly before resuming operations. Drainage may be followed by a potable or sterile water rinse. This product when used per label directions is effective against *Enterobacter aerogenes, Escherichia coli, Listeria monocytogenes, Pseudomonas aeruginosa, Salmonella typhimurium, Staphylococcus aureus, Pediococcus damnosus,* and *Lactobacillus malefermentans.*

ANTIMICROBIAL RINSE OF PRECLEANED OR NEW RETURNABLE OR NON-RETURNABLE CONTAINERS

To reduce the number of beverage spoilage organisms, *Lactobacillus malefermentans, Saccharomyces cerevisiae, Alicyclobacillus acidoterrestris* and *Pencillium digitatum*, apply Enviro San at a concentration of 2 to 15 ounces concentrate per 3 gallons of water (0.58% to 4.4% by weight) at a temperature of 40 to 65 °C for at least 7 seconds. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water.

To reduce the number of beverage spoilage organisms, *Lactobacillus malefermentans, Pediococcus damnosis, Saccharomyces cerevisiae* and *Pencillium digitatum*, apply Enviro San at a concentration of 6 to 25 ounces concentrate per 5 gallons of water (1.0% to 4.4% by weight) at ambient temperature for at least 10 seconds. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water.

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BOOSTER FOR ALKALINE AND ACIDIC DETERGENTS TO CLEAN FOOD PROCESSING EQUIPMENT:

Enviro San is an effective oxygen bleach cleaning booster for use with alkaline and acidic detergents. For cleaning applications as a detergent booster, use 2 to 8 ounces concentrate per 3 gallons of water (0.58% to 2.3% by weight) to aid in the removal of organic soils. All hard non-porous food contact surfaces treated with this boosted detergent must be rinsed thoroughly with a potable water rinse followed by sanitizing with an approved food contact surface sanitizer.

NOTE: This product in its use solutions is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

STORAGE & DISPOSAL:

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

PESTICIDE STORAGE: Product should be kept cool and in a vented container to avoid any explosion hazard.

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.

FOR COMMERCIAL USE ONLY
STRONG OXIDIZING AGENT

Net Contents:
96 ounces
1 U.S. Gal. (3.78 L)
4 U.S. Gals. (15.1 L)
50 U.S. Gals. (189 L)
30 U.S. Gals. (113.5 L)

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

EPA Reg. No. 1677-185
EPA Est. No.: 1677-MN-1 (P), 60156-IL-1 (SI), 1677-CA-2 (R), 1677-TX-1 (D), 1677-OH-1 (H), 1677-IL-2 (J), 1677-CA-1 (S), 1677-GA-1 (M), 1677-WV-1 (V)
Superscript refers to first letter of state code

ACCEPTED
with COMMENTS
EPA Letter Dated:
MAY 14 2010
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-185