1677-185

9 [23] 2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 2 3 2010

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

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

Attention: Theodore D. Head Senior Manager, Product Registration & Compliance

Subject: Enviro San Label Amendment with Data EPA Reg. No. 1677-185 Amendment Dated August 23, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. The Agency approves the following Amendments to the label:

- On page three, addition of the word "minimum" under the subheadings "Enviro San with ES-2000 at 50°C (4000 ppm POAA)" and "Enviro San with ES-2000 at 50°C (3000 ppm POAA)" so that the sentences read "...at a minimum temperature of 50°C."
- On page four, the replacement of "50-60" with ">50" on the y-axis of the table in the row labeled "Temperature."
- On page six, addition of the phrase "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..." and deletion of the phrases "Commercially sterilize clean, non-porous food packaging materials," and "food packaging material." The Agency further approves the addition of the words "minimum" so that the sentence reads, "...at a minimum temperature of 50°C," and "equipment" so that the sentence reads, "Use immersion, coarse spray, or circulation techniques as appropriate to sterilize the equipment."
- On page seven, addition of the phrase "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..." and deletion of the phrase "Commercially sterilize clean,

- On page eight, the replacement of "50-60" with ">50" on the y-axis of the table in the row labeled "Temperature."
- On page ten, deletion of the organisms *Lactobacillus malefermentans*, *Saccharomyces cerevisiae*, *Alicyclobacillus acidoterrestris*, and *Pencillium digitatum*. The Agency further approves the addition of the phrase "To reduce the number of beverage spoilage organisms apply Enviro San at a concentration of 0.8 ounces of concentrate per 1.0 gallon of water (1000 ppm by weight) and ES-2000 at a concentration of 0.01 ounces of concentrate per 1.0 gallon of water (100 ppm be weight) at a minimum temperature of 30°C for at least 3 seconds. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water."

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 Abigail Downs at (703) 305-5259.

Sincerely,

Juna

Marshall Swindell (Product Manager (33) Regulatory Management Branch I Antimicrobials Division (7510P)

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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

Active Ingredients:

Hydrogen Peroxide	11.2%
Peroxyacetic Acid	15.2%
Inert Ingredients	73.6%
Total1	00.0%

ACCEPTED with COMMENTS EPA Letter Dated:

SEP 2 3 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as

KEEP OUT OF REACH OF CHILDREN egistered under EPA Reg. No. /677-185 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 evewear (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 or 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.



Under the Federal Insecticide,

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* (*DEPTED*) solution is prepared in water of up to 500 ppm hardness. Refer to Directions with *USEDIMENTS* determine the suitable application with alternative concentrations and contact times *LetterDated*: 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 amended, for the pesticide, registered under EPA Reg. No. 1677-18

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 minimum 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 minimum 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: SEP 2 3 2010

Under the Federal Insecticide, 11 Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-185

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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
Prepero 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	50-60 ->50
StallEngeoluton must be meinenne er						
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 ₂ O 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	As needed to achieve <500
					ppm H ₂ O ₂ , not	ppm H_2O_2 , not
					to exceed 650	to exceed 650
					ppm ES-2000	ppm ES-2000
Contact time (seconds)	19	40	19	40	15	35
Effective against the	Bacillus cereus	Bacillus cereus	Bacillus subtilis	Bacillus	Bacillus	Bacillus
following organisms	Bacillus subtilis	Bacillus subtilis	Clostridium sporogenes	subtilis	cereus	cereus
	Clostridium	Clostridium		Clostridium	Bacillus	Bacillus
	sporogenes	sporogenes		sporogenes	subtilis	subtilis
					Clostridium	Clostridium
				.	sporogenes	sporogenes



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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* **increases in COMMENTS**

EPA Letter Dated:

SEP 23 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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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 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)

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 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 minimum temperature of 50°C. Sterilization solution must be maintained at a minimum of 4000 ppm peroxyacetic acid and a maximum of 500 ppm H₂O₂. 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 equipment. 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.

> ACCEPTED with COMMENTS EPA Letter Dated:

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

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

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-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 H₂O₂. ES-2000 should be added to the recirculating system to achieve 500 ppm H₂O₂ 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 equipment. 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:

SEP 2 3 2010

Inder the Federal Insecticide, ungicide, and Rodenticide Act as smended, for the pesticide, registered under EPA Reg. No. 1677-185 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:

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	(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
<u>Preparo colutions</u>						
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	50-60 >50
Scallzing solution must be meinelned et:						
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 ₂ O 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	As needed to
					achieve <500	achieve <500
					ppm H_2U_2 , not	ppm H_2U_2 , not
Contact time (accorde)	10	40	10	40	ppm ES-2000	25
Effective against the	19 Regillus corous	40 Recillus corous	Recillus cubtilis	40 Regillug	10 Recilluo	Booillus
following organisms	Dacilius cereus Rooilluo oubtilio	Dacillus cereus	Clostridium anarogonaa	Dacillus	Dacilius	Dacilius
ionowing organisms	Davillus subulis Clostridium	Davillus subulis Clostridium	Ciostiluium sporogenes	Supulis	Cereus Dooillug	Regillus
	Sporogonos	ciusulululli		ciosinulum	Daullius subtilis	subtilie
	sporogenes	sporogenes		ACCEPTED	Subuiis	Subuiis
			vvi	th COMMENT	Ciustilululli	ciustiluium
			r	DAT	sporogenes	sporogenes

EPA Letter Dated:

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.

ACCEPTED with COMMENTS EPA Letter Dated:

SEP 2 3 2010

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

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.

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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.

To reduce the number of beverage spoilage organisms apply Enviro San at a concentration of 0.8 ounces of concentrate per 1.0 gallon of water (1000 ppm by weight) and ES-2000 at a concentration of 0.01 ounces of concentrate per 1.0 gallon of water (100 ppm by weight) at a minimum temperature of 30°C for at least 3 seconds. After thorough draining, rinse surfaces with a disinfected water rinse free of pathogenic bacteria or sterile water.

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.

ACCEPTED with COMMENTS EPA Letter Dated: SEP 23 2010

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

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.

CONTAINER DISPOSAL:

FOR USE ON NON-REFILLABEL CONTAINERS WITH `INDUSTRIAL/COMMERCIAL/INSTITUIONAL – PUBLIC HEAL USES: Non-refillable container. Do not reuse this container to hold materials other than pesticides or diluted pesticide rinsate. Offer for recycling if available or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

RESDIUE REMOVAL INSTRUCTIONS: For containers less than 5 gallons. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Fill container ¼ 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.

RESIDUAL REMOVAL INSTRUCTIONS: For containers greater than 5 gallons. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Fill container ¼ full with water. Tip container on its side and roll back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over its other end and tip back and forth several times. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times.

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 date **GRECEPTED**

with COMMENTS

SEP 2 3 2010

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