

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 13 2001

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

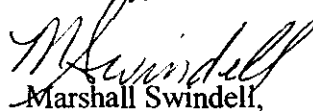
RE: Victory
EPA Reg. No. 1677-186
Your Amendment Dated 10/24/2000

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to provide a revised label which:

- A. changes the official product name from "JT-3166" to "Victory",
- B. deletes the sentence "Fruits and vegetables which are to be further processed must be rinsed with potable water", based on the FDA ruling in the Federal Register dated 7/19/99,
- C. clarifies that the product is for control of decay/spoilage organisms, not public health organisms, and that a continuous 30 second spray is required (versus spray and wait 30 seconds),
- D. adds additional fruits and vegetables to "Information Sheet #1",
- E. corrects the label declarations for each active ingredient to match the formula,
- F. moves the alternate use directions for using the product with Ecolab dispenser equipment, from a separate sheet to the main label, and which
- G. updates the "First Aid" statements to comply with PR Notice 2001-1, **is acceptable.**

A stamped copy of the approved label is enclosed for your records. This label supercedes all prior labels. If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443.

Sincerely,



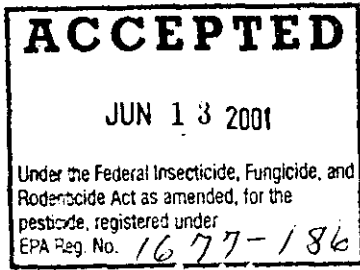
Marshall Swindell,
Product Manager Team 33,
Regulatory Management Branch I

CONCURRENCES Antimicrobials Division (7510C)

SYMBOL								
SURNAME								
DATE								

VICTORY

Antimicrobial Water Additive for Cleaning and Preparing Fruits and Vegetables



Active Ingredients:

Peroxyacetic acid..... 15.2%
Hydrogen peroxide..... 11.2%

Inert Ingredients: 73.6%

Total: 100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CORROSIVE: Causes severe eye damage and skin burns. Harmful or fatal if swallowed. Do not get in eyes, on skin, or on clothing. Wear chemical goggles, rubber gloves, and protective clothing if handling concentrate. Wash thoroughly with soap and water after handling. Remove any contaminated clothing and wash before re-use.

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.

IF SWALLOWED: Call a poison control center or doctor immediately 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 the poison control center or doctor. Do not anything by mouth to an unconscious person.

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

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: This product is toxic to birds, fish, and aquatic invertebrates. 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 your State Water Board or Regional Office of the EPA.

Patents Pending

Victory is intended for use in the control of microorganisms (or bacteria) which may cause decay (and/or spoilage) and that may be present in the water and on the surface of fresh-cut and post-harvest fruits and vegetable, as well as processed fruits and vegetables. This product is not intended for control of any public health organisms.

Areas of Use: Restaurants, cafeterias, food service operations, commissaries, kitchens, grocery stores, and food processing plants.

DIRECTIONS FOR USE

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

For Treatment of Fruit and Vegetable Surfaces:

Mix VICTORY with water either batchwise or continuously to no more than 80 ppm residual peroxyacetic acid and 59 ppm residual hydrogen peroxide in use solution. This can be accomplished by initially adding 53.3 grams (47.8 mls) VICTORY per 100 liters of water, or 1.0 fluid ounces VICTORY per 16.4 gallons of water. Add VICTORY as needed to maintain required residual concentrations of peroxyacetic acid and hydrogen peroxide. The fruits and vegetables can be sprayed or submerged in the resulting solution, followed by adequate draining. Minimum contact times of a 30 second continuous spray application and 1 minute for submersion are recommended.

Refer to VICTORY Information Sheet #1 for the recommended list of fruit and vegetables.

[Alternate Directions for Use for container types to be dispensed through an Ecolab dispenser]

For Treatment of Fruit and Vegetable Surfaces:

Using the appropriate Ecolab dispenser dilute the product to no more than 80 ppm peroxyacetic acid and 59 ppm residual hydrogen peroxide in use solution. Consult your Ecolab Representative for dispenser adjustments to insure accurate solution concentration. Use rate is typically adding 53.3 grams (47.8 mls) VICTORY per 100 liters of water, or 1.0 fluid ounces VICTORY per 16.4 gallons of water. The fruits and vegetables can be sprayed or submerged in the resulting solution, followed by adequate draining. Minimum contact times of a 30 second continuous spray application and 1 minute for submersion are recommended.

Refer to VICTORY Information Sheet #1 for the recommended list of fruit and vegetables.

STORAGE AND DISPOSAL:

DO NOT CONTAMINATE WATER OR FOOD BY STORAGE OR DISPOSAL

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

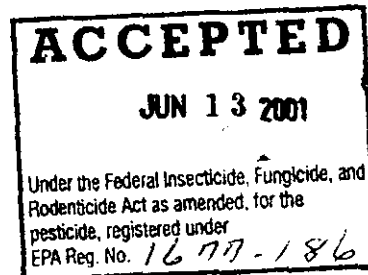
PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

[Sealed containers]: Dispense product thorough the appropriate Ecolab equipment until container is empty. Dispose of empty container in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[50 gallon drum] Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[300 gallon tote] Verify that the tote is empty. Do not rinse or clean. Seal tote and contact Ecolab for return.



4/5

Net Contents:
58 oz. (1,715 mls)
96 oz. (2,839 mls)

FOR COMMERCIAL OR INSTITUTIONAL USE ONLY
STRONG OXIDIZING AGENT

Manufactured by:
Food & Beverage Division
Eccelab Inc.
370 N. Wabasha Street
St. Paul, MN 55102

EPA Est.: 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-PR-1 (B), 1677-CA-1 (S)
1677-NJ-1 (W), 1677-GA-1 (M), 1677-1-WV(V)
Superscript refers to first letter of date code

ACCEPTED
JUN 13 2001

Under the Federal Insecticide, Fungicide, and
Rodenticide Act as amended, for the
pesticide, registered under
EPA Reg. No. 1677-186

INFORMATION SHEET #1
[package insert]

VICTORY

Antimicrobial Water Additive for Cleaning and Preparing Fruits and Vegetables

EPA Reg. No. 1677-186

VICTORY can be applied to the following types of fresh, post harvest, and further processed fruit and vegetables:

Vegetables

- ◆ Root and tuber vegetables: Carrot, potato, radish, rutabaga, sweet potato, yam, sugar beet
- ◆ Leaves of root and tuber vegetables: Turnip greens and sugar beet
- ◆ Bulb vegetables: Onion (dry bulb and green), leek, garlic, shallot
- ◆ Leafy vegetables: Lettuce (head and leaf), celery, fennel, endive, escarole, parsley, radicchio, rhubarb, spinach
- ◆ *Brassica* leafy vegetables: Broccoli, Brussel sprouts, cabbage, cauliflower, mustard greens, mustard spinach
- ◆ Legumes [succulent or dried]: bean (green, kidney, lima, mung, navy, pinto, snap, wax), pea (chick, lentil, dwarf, garden, English, field, edible pea pod), alfalfa, and soybean
- ◆ Fruiting vegetables: Pepper (bell, pimento, hot, sweet), tomato, tomatillo, eggplant
- ◆ Cucurbits: Cucumber, melon (cantaloupe, crenshaw, honeydew, honey ball, mango, muskmelon, pineapple, watermelon), summer squash, pumpkins, winter squash

Fruits

- ◆ Citrus fruits: Sweet orange, sour orange, lemon, lime, tangelo, tangerine, mandarin, citrus citron, kumquats, grapefruit
- ◆ Pome fruits: Apples and pears
- ◆ Stone fruits: Sour and sweet cherry, peach, nectarine, plum, prune
- ◆ Small Fruits and berries: Blackberries, blueberries, red and black raspberries

Sprouts and seeds of: vegetables and fruits that are listed on this label including, root & tuber vegetables, bulb vegetables, leafy vegetables, *Brassica* leafy vegetables, legumes, fruiting vegetables, cucurbits, citrus fruits, pome fruits, stone fruits, small fruits and berries, mustard

Tree nuts: Almond, Brazil, filbert, cashew, pecan, walnut (black & English), macadamia, chestnut

Cereal grains: Corn, barley, oats, rice, wheat, triticale, wild rice, sweet corn

Herbs and Spices: Basil, chives, coriander, dill, lemongrass, marjoram, sage, savory, tarragon, thyme

Miscellaneous: Asparagus, avocado, artichoke, banana, cranberry, fig, grape, kiwifruit, mango, mushroom, okra, peanut, persimmon, pineapple, raisins, strawberry, water chestnut, watercress

Ecolab Inc.
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