

1677-186

02/01/2007

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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

FEB 1 2007

Attention: John Wood
Regulatory Manager

Subject: Victory
EPA Reg. No. 1677-186
Amendment Application Date: October 31, 2006
EPA Received Date: November 3, 2006

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided the following label revisions are inserted:

- In the Precautionary Statements section, under *Hazards to Humans and Domestic Animals*, after the word "handling" (the second time "handling" is mentioned in that section), additional language should be included that states "and before eating, drinking, and chewing gum, or using tobacco".

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

Sincerely,

C/O J. L. L.
for Marshall Swindell

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

VICTORY

Water Additive for Pathogen* Reduction in Fruit and Vegetable Wash or Process Waters

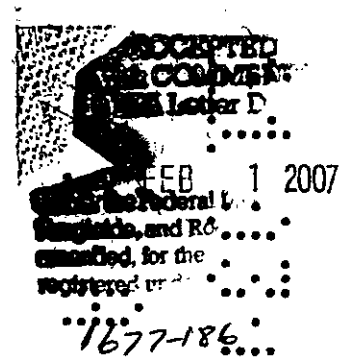
Controls the Growth of Spoilage and Decay Causing Non-Public Health
Organisms on Fruit and Vegetable Surfaces and in Wash or Process Waters

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.

Used as directed, **Victory** reduces 99.9% of the pathogens *Escherichia coli* O157:H7*, *Listeria monocytogenes** and *Salmonella enterica** in fruit and vegetable wash waters. **Victory** also provides control of spoilage and decay causing non-public health organisms present in the wash or process waters and on the surface of fresh-cut, post-harvest and processed fruits and vegetables.

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 Pathogen* Reduction and Control in Fruit and Vegetable Wash or Process Waters:

Victory will provide a 99.9% reduction of the pathogens *Escherichia coli* O157:H7*, *Listeria monocytogenes** and *Salmonella enterica** in fruit and vegetable wash or process waters.

Mix **Victory** with water either batchwise or continuously by adding 1.0 fluid ounce **Victory** per 16.4 gallons of water (53.3 grams or (48 mL) **Victory** per 100 L of water). This will produce 30-80 ppm peroxyacetic acid. Adjust dose as needed to maintain product concentration. Allow a minimum contact time of 90 seconds.

For Treatment of Fruit and Vegetable Surfaces and Wash or Process Waters:

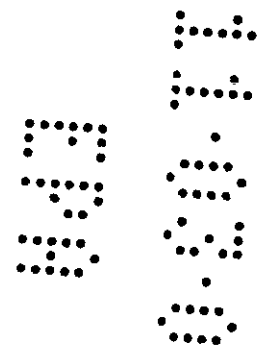
Victory will control the growth of spoilage and decay causing non-public health organisms in wash waters and on the surface of fruits and vegetables. This product is not intended for control of any public health organisms on fruit and vegetable surfaces.

Mix **Victory** with water either batchwise or continuously by adding 1.0 fluid ounce **Victory** per 16.4 gallons of water (53.3 grams or (48 mL) **Victory** per 100 L of water). This will produce 30-80 ppm peroxyacetic acid. Adjust dose as needed to maintain product concentration.

The fruits and vegetables can be sprayed or submerged in the resulting solution, followed by adequate draining. Minimum contact times of a 45 second continuous spray application and 1 minute for submersion are recommended.

Refer to **Victory** Package Insert for the recommended list of fruit and vegetables.

ACCEPTED
WITH COMMENTS
in EPA Letter Dated
11 2007
EPA is the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pest
registered
1677-186



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 through 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.

Patents Pending

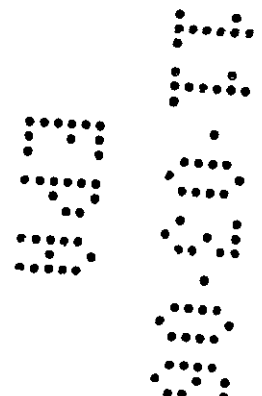
Net Contents:
58 oz. (1, 715 mls)
96 oz. (2,839 mls)

FOR COMMERCIAL OR INSTITUTIONAL USE ONLY
STRONG OXIDIZING AGENT

Manufactured by:
Ecolab 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-GA-1 (M), 1677-WV-1 (V)
Superscript refers to first letter of date code

ACCEPTED
WITH COMMENTS
By EPA Letter Dated:
1 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
registered
1677-186



VICTORY

Water Additive for Pathogen* Reduction in Fruit and Vegetable Wash Waters

Controls the Growth of Spoilage and Decay Causing Non-Public Health Organisms on Fruit and Vegetable Surfaces

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

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