



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 18, 2018

Bridget Middleton  
Regulatory Specialist I  
Ecolab Inc.  
1 Ecolab Place  
St. Paul, MN 55102

Subject: Label Amendment – Adding Marketing Claims and updating the Precautionary Statements  
Product Name: Victory  
EPA Registration Number: 1677-186  
Application Date: 01/26/2018  
Decision Number: 538340

Dear Ms. Middleton:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2  
EPA Reg. No. 1677-186  
Decision No. 538340

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, you may contact Aline Heffernan at 703-347-8602 or via email at [heffernan.aline@epa.gov](mailto:heffernan.aline@epa.gov).

Sincerely,



Zeno Bain, Product Manager 33  
Regulatory Management Branch I  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

Enclosure: Stamped Label

**ACCEPTED**

Dec 18, 2018

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

# 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 (Which Can (Help) Extend  
Produce Shelf Life (and Reduce Waste))**

### Antimicrobial Fruit and Vegetable Wash

#### Active Ingredients:

Peroxyacetic acid ..... 15.2%

Hydrogen peroxide ..... 11.2%

**Inert Ingredients:**..... 73.6%

**Total:**..... 100.0%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

(See [back], [side], [inside], [other] [fold-out] [booklet] [product container] [hang tag] [label(s)]  
[panel(s)] [container] for [complete] [additional] [directions for use] [precautionary statements]  
[and] [first aid] [and] [storage and disposal])

#### PRECAUTIONARY STATEMENTS

##### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER:** Corrosive. Causes irreversible eye damage and skin burns. May be fatal if  
swallowed. Do not get in eyes, on skin, or on clothing. Wear gloves, safety glasses and  
protective clothing. 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 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 immediately for treatment advice.  
Have 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 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.

(Note to Reviewer: For containers of 5 gallons or more, the following Environmental Hazards language will appear on the final product label.)

**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.

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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, which can (help) extend produce shelf life (and) (reduce waste) (and can maintain crisp texture of produce).

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

(Note to reviewer: language in parenthesis is optional. Any claim not approved by CDPR will include the statement "Use not approved in the state of California")

**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, which can (help) extend produce shelf life (and) (reduce waste) (and can maintain crisp texture of produce). 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 fruits and vegetables.

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## **STORAGE AND DISPOSAL:**

DO NOT CONTAMINATE WATER OR FOOD BY STORAGE OR DISPOSAL

**PESTICIDE STORAGE:** Product must 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 HANDLING AND DISPOSAL:**

(For containers 5 gallons or less.) Non-refillable container. Do not reuse or refill this container. Triple rinse as follows: Fill container  $\frac{1}{4}$  full with water and recap. Shake for 10 seconds. Drain for 10 seconds after the flow begins to drip. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times. Then offer for recycling or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

(For containers >5-55 gallons.) Non-refillable container. Do not reuse or refill this container. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container  $\frac{1}{4}$  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 procedure two more times. Then offer for recycling or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

(Totes) Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Verify that the tote is empty. Seal tote and contact Ecolab for return. Cleaning the container before disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container empty the remaining contents from this container into a holding vessel or rinsate collection system. Fill the container about 10 percent full with water. Agitate vigorously for 2 minutes. Pour or pump rinsate into holding vessel or rinsate collection system. Repeat this rinsing procedure two more times.

(Sealed Container): (Non-refillable sealed container is designed to reduce worker exposure to the concentrate. This container cannot be triple rinsed because it is a closed container. The following text will be used on this container.) Non-refillable sealed container. Do not reuse or refill this container. Wrap empty container and put in trash.

U.S. Patent No. 5,674,538

This product may be patented | Ce produit peut être breveté | Este producto puede ser patentado: [www.ecolab.com/patents](http://www.ecolab.com/patents)

FOR (COMMERCIAL) (OR) (INSTITUTIONAL) USE  
STRONG OXIDIZING AGENT

EPA Reg. No. 1677-186

EPA Est.: 303-IN-1 (L), 1677-CA-2 (R), 1677-GA-1 (M), 1677-IL-2 (J), 1677-MN-1 (P), 1677-TX-1 (D), 1677-WV-1 (V), 5389-NC-1 (G), 58046-TX-2 (X), 60156-IL-1 (SI),

Superscript refers to first letter of date code

(Manufactured)(Distributed) by:  
Ecolab Inc.  
1 Ecolab Place  
St. Paul, MN 55102

Net Contents: 58 oz. (1,715 mls) 96 oz. (2,839 mls) 55 U.S. Gals. (208.2 L) 300 U.S. Gals. (1134 L) - tote
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(Made in United States of America) (Made in USA)

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(Si no puede leer en inglés, pregunte a su supervisor sobre las instrucciones de uso apropiadas antes de trabajar con este producto.)

Package insert

## 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 and in Wash or Process Waters (Which Can (Help) Extend  
Produce Shelf Life (and Reduce Waste))**

### Antimicrobial Fruit and Vegetable Wash

EPA Reg. No. 1677-186

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

### OPTIONAL MARKETING LANGUAGE

Washing as directed can (help) extend shelf life of produce versus washing with water alone.

Washing as directed can reduce wilting and maintain (crisp) texture of produce.

Washing as directed (, followed by refrigeration,) (has a crisping or rehydrating benefit for) (fresh-cut, post-harvest and processed) fruits and vegetables.

Used as directed, [insert product name] can be used in crisping water for (fresh-cut, post-harvest and processed) fruits and vegetables.

[Optional Marketing Graphics]

