

1677-189

97-23-2010

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

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

JUL 23 2010

Attention: Rhonda K. Schulz, Associate Director
Regulatory Affairs

Subject: Surpass 100
EPA Registration No. 1677-189
Your Amendment Dated March 29, 2010

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment

- updated Label
- Storage stability and corrosion characteristic studies

Conditions

Make the following revisions to the product label:

- Under the "Precautionary Statements" section of the product label, change "before eating, drinking or using tobacco" to read "before eating, drinking, chewing gum, using tobacco, or using the toilet."
- Under the "Pesticide Storage" section of the product label, add instructions that specify what to do if the product leaks or spills from the product container.
- Under the "Storage and Disposal" section of the product label, change the "Container Disposal" subheading to read "Container Handling."

General Comment

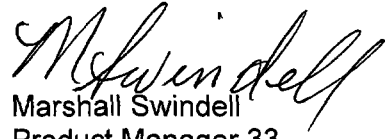
The Product Chemistry Data under 830 Guidelines (Group B) and the Storage Stability and Corrosion Characteristics studies were found to be acceptable.

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Submit two (2) copies of the final printed label with the above revisions. A stamped copy of the "accepted" product label and a copy of the review are enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely



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

Enclosures

CoolingCare 2905 SURPASS 100

A MICROBIOCIDAL FOR USE IN CONTROLLING SLIME FORMING BACTERIA, SULFATE-REDUCING BACTERIA, FUNGI AND ALGAE IN RECIRCULATING COOLING TOWERS, AIR WASHERS, AND HEAT TRANSFER SYSTEMS. A SANITIZER FOR USE IN ULTRA FILTRATION (NON-FOOD CONTACT) AND INSTITUTIONAL /INDUSTRIAL USE REVERSE OSMOSIS (RO) MEMBRANES AND THEIR ASSOCIATED DISTRIBUTION SYSTEMS.

Active Ingredients:

Peroxyacetic Acid 4.5%
Hydrogen Peroxide 27.0%

Inert Ingredients: 68.5%
Total: 100.0%

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

JUL 23 2010

**KEEP OUT OF REACH OF CHILDREN
DANGER**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide, registered under EPA Reg. No. *1677-189*

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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 Inhaled: Move person to fresh air. If person is not breathing, call 911 for an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

If Swallowed: Call a poison control center or doctor immediately for treatment advice. Have the 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 introduce 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

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.

FOR COMMERCIAL USE
STRONG OXIDIZING AGENT

DIRECTIONS FOR USE

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

RECIRCULATING COOLING WATER SYSTEMS AND HEAT TRANSFER SYSTEMS

Examples of heat transfer systems are Evaporative Condensers, Dairy Sweetwater Systems, Hydrostatic Sterilizers and Retorts, Cooling Canals, Pasteurizers, Tunnel Coolers and Warmers, Closed and Once Through Cooling Systems and COW Water Systems. For control of bacteria, algae and fungi in recirculating cooling water systems add *Surpass 100* to the tower basin, distribution box or some other point to insure uniform mixing. For heat transfer systems, the product should be added to the system at a point of uniform mixing such as a basin area, sump area or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

INTERMITTENT OR SLUG METHOD

Initial Dose: When the system is noticeably fouled, apply 150 to 600 ppm *Surpass 100* (1.25 to 5.0 pounds per 1,000 gallons of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

Subsequent Dose: After microbial control is evident, add 75 to 300 ppm *Surpass 100* (0.62 to 2.5 pounds per 1,000 gallons of water in the system) weekly or as needed to maintain microbial control. Badly fouled systems must be cleaned before treatment is begun.

CONTINUOUS FEED METHOD

Initial Dose: When the system is noticeably fouled apply 150 to 600 ppm *Surpass 100* (1.25 to 5.0 pounds per 1,000 gallons of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

Subsequent Dose: Maintain this treatment level by starting a continuous feed of 60 to 240 ppm *Surpass 100* (0.5 to 2.0 pounds per 1,000 gallons of makeup water added to the system). Badly fouled systems must be cleaned before treatment is begun.

AIR WASHER SYSTEMS

To control bacteria, fungi and algae in industrial air washer systems. Add to the Air Washer sump or Chill Water or Coil Spray Water to insure uniform mixing.

CONTINUOUS FEED METHOD

Initial Dose: When the system is noticeably fouled apply 300 to 3000 ppm *Surpass 100* (2.5 to 25 pounds per 1,000 gallons of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

Subsequent Dose: Maintain this treatment level by starting a continuous feed of 120 to 1800 ppm *Surpass 100* (1.0 to 15 pounds per 1,000 gallons water lost by blowdown). Badly fouled systems must be cleaned before treatment is begun.

AIR AND GAS SCRUBBER AND COW WATER SYSTEMS

To control bacteria, fungi and algae in these water systems. This product should be added to the system at a convenient point of mixing.

CONTINUOUS FEED METHOD

Initial Dose: When the system is noticeably fouled apply 300 to 9000 ppm *Surpass 100* (2.5 to 75 pounds per 1,000 gallons of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

Subsequent Dose: Maintain this treatment level by starting a continuous feed of 150 to 200 ppm *Surpass 100* (1.25 to 45 pounds per 1,000 gallons water lost by blowdown). Badly fouled systems must be cleaned before treatment is begun.

ACCEPTED
With COMMENTS
EPA Letter Dated:

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Additional or Alternate Directions for Use
(may be on label, as a package insert, hang tag, or technical bulletin)

BATCH SANITIZATION (NON-FOOD CONTACT SURFACES) FOR ULTRA FILTRATION AND REVERSE OSMOSIS (RO) MEMBRANES

Not for use on kidney dialysis membranes, associated systems, and any other medical devices of this type.

This product has been shown to be an effective sanitizer when tested by AOAC and EPA methods. This product may not totally eliminate all vegetative microorganisms in reverse osmosis membranes and their associated piping systems due to their construction and/or assembly, but can be relied upon to reduce the number of microorganisms to acceptable levels when used as directed. Check with equipment manufacturer for membrane compatibility with *Surpass 100*.

1. Clean the membrane or other parts of the system with an appropriate cleaner to remove biological or organic fouling.
2. Flush the system with RO permeate or similar quality water.
3. If necessary, circulate an appropriate acid cleaner to remove mineral deposits.
4. Flush the system with RO permeate or similar quality water.
5. Prepare *Surpass 100* by adding 43-213 fluid ounces of product to 100 gallons of water. This will provide 150-800 ppm peroxyacetic acid.
6. Fill the system to be sanitized with the *Surpass 100* solution and allow to reach a minimum temperature of 20 degrees C.
7. Recirculate the *Surpass 100* solution for 10-15 minutes.
8. Allow membrane elements to soak in the *Surpass 100* solution for 20 minutes.
9. Drain the *Surpass 100* solution from the system and rinse with RO permeate, or similar quality water, until the residual peroxyacetic acid is below 3 ppm.

BATCH SANITIZATION (NON-FOOD CONTACT SURFACES) OF PIPING SYSTEMS ASSOCIATED WITH RO MEMBRANES

1. Isolate incompatible equipment from piping system. This includes activated carbon filters and ion exchange equipment. Turn off power to ultraviolet light units.
2. Estimate total volume of water contained in the system (tanks, rinse stations, and piping). Prepare *Surpass 100* by adding 43-213 fluid ounces of product per 100 gallons of water. Use RO permeate or similar quality water for dilution. This will provide 150-800 ppm peroxyacetic acid.
3. Recirculate the *Surpass 100* solution for minimum of 4 hours. Process usage valves should be opened and closed to expose internals to the *Surpass 100* solution.
4. Drain the *Surpass 100* solution from the system and rinse with RO permeate, or similar quality water, until the residual peroxyacetic acid is below 3 ppm.

CONTINUOUS/INTERMITTENT ADDITION TO MINIMIZE THE ACCUMULATION OF BIOLOGICAL MATTER BETWEEN SANITIZING EPISODES

1. *Surpass 100*, as received or diluted, may be added continuously to the feed water system between sanitizing episodes to aid in minimizing the accumulation of biological matter. The peroxyacetic acid residual concentration in the system will vary with the design and usage characteristics of the system. Adjust the addition rate of *Surpass 100* or *Surpass 100* solution and periodically monitor the peroxyacetic acid concentration so that the desired effect is obtained.
2. For continuous addition add 0.25 ounces of product per 100 gallons water to provide 22.2 ppm *Surpass 100*. This will provide 1 ppm peroxyacetic acid. For intermittent feed add 26.4 ounces of product per 100 gallons water to provide 2333 ppm *Surpass 100*. This will provide 105 ppm peroxyacetic acid.

RECIRCULATING COOLING WATER SYSTEMS AND HEAT TRANSFER SYSTEMS

Examples of heat transfer systems are Dairy Sweetwater Systems, Hydrostatic Sterilizers and Pasteurizers, Cooling Canals, Pasteurizers, Tunnel Coolers and Warmers. For control of bacteria, algae and fungi in recirculating cooling water systems add *Surpass 100* to the tower basin, distribution box or some other point to insure uniform mixing. For heat transfer systems, the product should be added to the system at a point of uniform mixing such as a basin area, sump area or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

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INTERMITTENT OR SLUG METHOD

Initial Dose: When the system is noticeably fouled, apply 150 to 600 ppm *Surpass 100* (19.2 to 76.8 ounces per 1,000 gallons of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

Subsequent Dose: After microbial control is evident, add 75 to 300 ppm *Surpass 100* (9.6 to 38.4 ounces per 1,000 gallons of water in the system) weekly or as needed to maintain microbial control. Badly fouled systems must be cleaned before treatment is begun.

CONTINUOUS FEED METHOD

Initial Dose: When the system is noticeably fouled apply 150 to 600 ppm *Surpass 100* (19.2 to 76.8 ounces per 1,000 gallons of water in the system) weekly or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

Subsequent Dose: Maintain this treatment level by starting a continuous feed of 60 to 240 ppm *Surpass 100* (7.7 to 30.7 ounces per 1,000 gallons of makeup water added to the system). Badly fouled systems must be cleaned before treatment is begun.

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:

(<55-gallons rigid) Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Offer for recycling, if available, or discard in trash.

(bladder-in-box) Remove empty bladder from outer corrugated box. Triple rinse bladder (or equivalent). Offer box and bladder for recycling, if available or discard in trash.

(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.

EPA Reg. No. 1677-189

EPA Est. 1677-MN-1 (P), 60156-IL-1 (SI), 1677-CA-2(R), 1677-TX-1(D), 1677-OH-1(H), 1677-IL-1(J), 1677-GA-1(M), 1677-CA-1(S), 1677-WV-1(V)

Superscript refers to first letter of date code

Ecolab Inc.
370 Wabasha Street N.
St. Paul, MN 55102-1390

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EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
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Net Contents:	4 U.S. Gals. (15.1 L)
	50 U.S. Gals. (189 L)
	300 U.S. Gals. (tote)