1677-189

05/10/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

EPA United States Environmental Protection Agency **Office of Pesticide Programs**

Ecolab Inc
370 N Wabasha Street
St Paul MN
55102

MAY 10 2012

Attention Rhonda Schulz

Subject **Surpass 100**
EPA Registration No 1677 189
Notification Dated April 5 2012

This will acknowledge receipt of your notification submitted under the provisions of the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) Section 3(c) (9)

Proposed Notification

To add optional marketing language related to packaging

General Comments

Base on a review of the submitted material the following comments apply

The Notification dated April 5 2012 to add optional marketing language and graphic is acceptable and is in compliance with PR Notice 98 10 A stamped copy of the label has been placed in your file

If you have any questions concerning this letter please contact Zebora Johnson at (703) 308 7080

Sincerely

Marshall Swindell
Product Manger (33)
Regulatory Management Branch I
Antimicrobial s Division (7501P)

Please read instructions on reverse before completing form

Form App ed OMB N 2070 0060 App o I E pir 5 31 98

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United S

EPA Environmental Protection Agency

Washington DC 20460

☐ Registrat)
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide Section I

1 Company/Product Number	2 EPA Product Manager	3 Proposed Classification
1677 189	Marshall Swindell	☒ None ☐ Restricted
3 Company/Product (Name)	PM#	
Surpass 100	33	

5 Name and Address of Applicant (Include ZIP Code)
Ecolab Inc
370 N Wabasha Street
St Paul MN 55102

☐ Check if this is a new address

6 **Expedited Review** In accordance with FIFRA Section 3 (c) (3) (b) (i) my product is similar or identical in composition and labeling to
EPA Reg No _____
Product Name _____

Section – II

☐ Amendment Explain below
☐ Final printed labels in response to Agency letter dated
☐ Resubmission in response to Agency letter dated _____
☐ Me Too Application
☒ Notification – Explain below
☐ Other – Explain below

Explanation Use additional Page(s) if necessary (For section I and Section II)

Ecolab Inc is submitting a label notification per PRN 98 10 to add optional marketing language and graphic for EPA Reg No 1677 189

This notification is consistent with the provisions of PR Notice 98 10 and EPA regulations at 40 CFR 152 46 and no other changes have been made to the labeling or the confidential statement of formula of this product I understand that it is a violation of 18 U S C Sec 1001 to willfully make any false statement to EPA I further understand that if this notification is not consistent with the terms of PR Notice 98 10 and 40 CFR 152 46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA

Section – III

1 Material This Product Will Be Packaged In

Child Resistant Packaging	Unit Packaging	Water Soluble Packaging	2 Type of Container
☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)_____
Certification must be submitted	If Yes Unit Packaging wgt / No per Container	If Yes Unit Package wgt / No Per Container	

3 Location of Net Contents Information	4 Size(s) Retail Container	5 Location of Label Directions
☒ Label ☐ Container	4 gal 50 gal & 300 gal	☒ On Label ☐ On Labeling accompanying product

6 Manner in Which Label is Affixed to Product ☐ Lithograph ☒ Paper glued ☐ Stenciled ☐ Other _____

Section IV

1 Contact Point *(Complete items directly below for identification of individual to be contacted if necessary to process this application)*

Name	Title	Telephone No (Include Area Code)
Rhonda Schulz	Director Product Registration & Compliance	(651) 293 4026

Certification

I certify that the statements which I have made on this form and all attachments are true accurate and complete I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law

6 Date Application Received (Stamped)

2 Signature	3 Title
Rhonda Schulz	Director Product Registration & Compliance
3 Typed Name: Rhonda Schulz	4 Date: 4/5/12

EPA Form 8750 1 (Rev 8 94) Previous editions are obsolete — White EPA File Copy (original) — Yellow Applicant Copy

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ECOLAB®

Rhonda Schulz
DIRECTOR – PRODUCT
REGISTRATION & COMPLIANCE

651 293 4026
651 225 3122

370 WABASHA STREET NORTH
EUC 9
ST PAUL MN 55102 1390
Rhonda Schulz@ecolab com

April 5 2012

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U S Environmental Protection Agency
Room S 4900 One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202 4501

ATTN Marshall Swindell PM 33

Re Surpass 100 EPA Reg No 1677 189

Dear Mr Swindell

Ecolab Inc is submitting a notification per PRN 98 10 to add optional marketing language and graphic All changes are highlighted in red

If you have any questions please do not hesitate to contact me directly at the above listed number or email address

Sincerely

Rhonda Schulz

Rhonda Schulz
Director – Product Registration & Compliance
Law & Regulatory

SURPASS 100

A MICROBIOCIDE 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%

KEEP OUT OF REACH OF CHILDREN

DANGER

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 chewing gum using tobacco or using the toilet 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

NOTIFICATION Date Reviewed 5/10/12 Reviewed By

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 cleared 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 5400 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

NOTIFICATION MAY 10 2011
Date Reviewed
Reviewed By

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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 Retorts 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

NOTIFICATION
Date Reviewed MAY 10 2012
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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 If the product leaks or spills from the container consult the MSDS for proper handling procedures
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 neare t EPA Regional Office for guidance
Container Handling
(<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

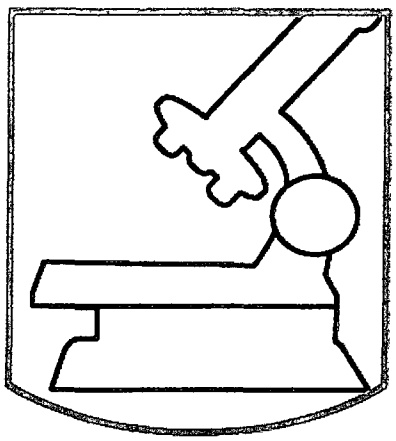
Ecolab Inc
370 Wabasha Street N
St Paul MN 55102 1390

Net Contents	4 U S Gals (15 1 L) 50 U S Gals (189 L) 300 U S Gals (tote)

NOTIFICATION
Date Reviewed MAY 10 2012
Reviewed By

Optional marketing language

- See side/back panel for First Aid
-



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NOTIFICATION 10 2012
Date Reviewed MAY
Reviewed By