

1677-219

6-16-2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

June 16, 2006

OFFICE OF  
PREVENTION,  
PESTICIDES  
AND TOXIC  
SUBSTANCES

Joy Salverda  
Ecolab Inc.  
370 N. Wabasha Street  
St. Paul, MN 55102

Subject: Sanova Base (25%)  
EPA Registration No. 1677-219  
Application Date: March 20, 2006  
Receipt Date: March 22, 2006

Dear Ms. Salverda:

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

**Conditions**

- 1. Revise the Ingredient Statement as follows:

Active Ingredient:	
Sodium Chlorite . . . . .	25.0%
Other Ingredients. . . . .	<u>75.0%</u>
Total . . . . .	100.0%
Available Chlorine: 39%	

- 2. Revise the first sentence in the Environmental Hazards statement to read: This product is toxic to fish and aquatic organisms.

**General Comments**

A stamped copy of the labeling accepted with conditions is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please call Wanda Henson at (703) 308-6345.

Sincerely,

Emily H. Mitchell  
Product Manager - Team 32  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

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ACCEPTED  
with COMMENTS  
EPA Letter Dated:

# SANOVA<sup>®</sup> BASE (25%)

JUN 16 2006

ACTIVE INGREDIENT:	.....	Wt. %
Sodium Chlorite*	.....	25.0%
INERT INGREDIENTS:	.....	75.0%
Total:	.....	100.00%

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

1677-219

\*AVAILABLE CHLORINE.....39%  
Contains 2.58 lbs. of Sodium Chlorite Per Gallon at  
70 °F

The mixed solution contains 1200 ppm acidified sodium chlorite when SANOVA<sup>®</sup> Base and Activator are mixed in the SANOVA<sup>®</sup> Food Processing Equipment or a similar closed system.

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

**DANGER.** Highly corrosive. May be fatal if swallowed. Do not get in eyes, on skin, or clothing. Do not get on bare hands. Wear goggles or face shield and neoprene gloves and use only thoroughly clean, dry utensils when handling. Irritating to nose and throat. Avoid breathing fumes. Remove and wash contaminated clothing to avoid fire.

**FIRST AID**

**IF IN EYES:** Hold eye open and rinse slowly and gently with plenty of water for at least 15 minutes. Remove contact lenses, if present, after 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 and shoes. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.

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

**IF SWALLOWED:** Call poison control center 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. 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 the 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.

**CHEMICAL HAZARDS**

Dry sodium chlorite is a strong oxidizing agent. This product becomes a fire or explosive hazard if allowed to dry. Mix only into water. Contamination may start a chemical reaction with generation of heat, liberation of hazardous gases (chlorine dioxide is a poisonous, explosive gas), and possible fire and explosion. Do not contaminate with garbage, dirt, organic matter, household products, chemicals, soap products, paint products, solvents, acids, vinegar, beverages, oils, pine oil, dirty rags, or any other foreign matter.

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**DIRECTIONS FOR USE**

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

For use in the generation of acidified sodium chlorite in a food processing facility to reduce the growth of microorganisms that cause spoilage on fruits and vegetables. To be used in conjunction with SANOVA® Activator and the SANOVA® Food Quality System. Consult the product technical bulletin for specific application instructions. Your Ecolab representative can guide you in the installation and operation of the SANOVA® Food Quality System.

For Control of Fruit and Vegetable Spoilage Microorganisms: This product effectively reduces the growth of microorganisms that cause spoilage or decay of fruits and vegetables. The SANOVA mixed solution may be applied using the spray or immersion processes when controlling bacteria or fungi causing decay of fruits or vegetables.

Acidified sodium chlorite, generated from sodium chlorite and citric acid, is cleared for either spray or immersion use on pre-process raw agricultural commodities by the U.S. Food and Drug Administration under 21 C.F.R., Part 173. This regulation permits the use of acidified sodium chlorite in the preparation, packing, or holding of raw agricultural commodities for commercial purposes and when followed by a potable water rinse or by blanching or cooking.

**STORAGE AND DISPOSAL**

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

**PESTICIDE STORAGE:** Keep product in tightly closed container when not in use. Do not drop, roll or skid drum. Keep upright. Always replace cover. Store in a cool, dry well-ventilated area away from heat or open flame. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open and well ventilated area. Flood with large volumes of water. If fire occurs, extinguish fire by applying large quantities of water. Any unopened drums near the fire should be cooled by spraying with water.

**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:**

(greater than 1 gallon) Triple rinse (or equivalent) container. Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or incineration if allowed to do so by state and local authorities, by burning. If burned, stay out of smoke.  
(totes) Verify that the tote is empty. Do not rinse or clean. Seal tote and contact Ecolab for return.



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

EPA Reg No. 1677-219  
EPA Est. No. 70547-IL-1

Net Contents: 3.3 gallons (12.5 L)  
55 gallons (207.9 L)  
275 gallons (1039.5 L)



## Technical Data Sheet

### SANOVA<sup>®</sup> for use on Pre-Process Raw Agricultural Commodities

#### Application Description

Raw Agricultural Commodities (fruits and vegetables) may harbor a wide variety of microbiological contaminants on their surfaces as a result of harvesting and shipping practices commonly used in the industry today. SANOVA<sup>®</sup> (acidified sodium chlorite) is an antimicrobial that effectively reduces populations of microorganisms that cause decay of raw fruits and vegetables intended for commercial food processing.

Acidified sodium chlorite, generated from sodium chlorite and citric acid, is cleared for use on pre-process Raw Agricultural Commodities by the U.S. Food and Drug Administration under 21 CFR, Part 173. This regulation permits the use of acidified sodium chlorite in the preparation, packing, or holding of raw agricultural commodities for commercial purposes and when followed by a potable water rinse or by blanching or cooking.

#### Feed Requirements

The required dosage of acidified sodium chlorite will vary according to the process conditions and the degree of contamination present on the materials to be treated. Acidification of the sodium chlorite occurs inside the SANOVA<sup>®</sup> Food Quality System after which, the acidified sodium chlorite should be applied to the raw agricultural commodity through a purpose designed applicator. Acidified sodium chlorite concentrations are effective in reducing spoilage and pathogenic microorganisms at 1200 ppm.

#### Method of Feed

Sodium chlorite is converted to acidified sodium chlorite through the SANOVA<sup>®</sup> Food Quality System. The latter is a PLC-regulated proportioning, diluting and mixing system which is designed to ensure the accurate mixing of sodium chlorite, citric acid and potable water to produce the final use dilution material. Mixed product may be in the pH range from 2.3 to 2.9. Following mixing, the acidified sodium chlorite solution is delivered via closed piping to the application unit.

For control of spoilage and decay-causing bacteria and fungi: The mixed solution may be applied by immersion or by spray. Mixed solution should remain in contact with fresh produce for a minimum of 15 – 30 seconds for effective control

For immersion of fresh produce, replenish or replace the mixed solution at the same rate of depletion of solution volume. This rate is dependent on the surface irregularity of the vegetables washed. Tanks should be completely emptied at the end of the day, or if in continuous operation, at the end of each 8-hour shift. Refer to the SANOVA Food Processing System set-up calibration data for replacement intervals specific to your operation.

For more information on SANOVA<sup>®</sup> or the SANOVA<sup>®</sup> Food Quality System, contact Ecolab Inc., Food & Beverage Division, 370 Wabasha Street N., St. Paul, MN 55102 .

#### Acidified Sodium Chlorite Analysis.

The final concentrations of acidified sodium chlorite used on Raw Agricultural Commodities must be determined by the Iodometric Titration Methodology specified, in 21 CFR, Part 173.

Ecolab Inc. believes the information contained herein is accurate however, Ecolab Inc. makes no guarantees with respect to such accuracy and assumes no liability in connection with the use of the information contained herein by any party. The provision of the information contained herein and the provision of information by or reliance on Ecolab Inc.'s technical personnel is not intended to be and should not be construed as legal advice or as ensuring compliance with any federal, state or local laws and regulations. Any party using Sanova should review all such laws, rules or regulations prior to using Sanova or the Sanova Food Quality System.