

1677-219

8/25/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

AUG 25 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Rhonda Schulz
Associate Director, Product Registration & Compliance
Ecolab Inc.
370 N. Wabasha St.
St. Paul, MN 55102

FILE COPY

Subject: Sanova Base 25%
EPA Registration No. 1677-219
Application Date: July 27, 2009
Receipt Date: July 29, 2009

Dear Ms. Schulz:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the condition listed below:

- Revision of Storage and Disposal statement per PR Notice 2007-4

Condition:

Revise the precautionary statement to read, "**DANGER.** Highly corrosive. Causes irreversible eye damage and skin burns. May be harmful if inhaled. Do not get in eyes, on skin or on 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 before reuse. Wash thoroughly with soap and water after handling and before eating, drinking and using tobacco."

General Comments:

A stamped copy of the labeling accepted with a condition is enclosed. Submit one (1) copy of your final printed label before distributing or selling the product bearing the revised labeling.

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

Sincerely,

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

SANOVA[®] BASE (25%)

Active Ingredient:
 Sodium Chlorite*25.0%
 Other Ingredients:75.0%
 Total:100.00%
 *Available Chlorine: 39%

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Contains 2.58 lbs. of Sodium Chlorite Per Gallon at 70 °F

The mixed solution contains 1200 ppm acidified sodium chlorite when SANOVA[®] Base and Activator are mixed in the SANOVA[®] 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 and aquatic organisms. 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.

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:

(≤ 55-gallon 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.

(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)

ACCEPTED
with COMMENTS
EPA Letter Dated:

AUG 25 2009

... the Federal Insecticide,
... as
...
... No. 1677-219