

1677-234

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

MAY - 2 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Rhonda Schulz
Ecolab Inc.
370 Wabasha Street
St. Paul, MN 55102

Subject: Antimicrobial Fruit & Vegetable Treatment
EPA Registration Number: 1677-234
Application Date: March 29, 2012
EPA Receipt Date: April 2, 2012

Dear Ms. Schulz:

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

Proposed Amendment

- Rearrange the text order of the Precautionary Language
- Adding Storage and Disposal Heading
- Adding Optional Marketing Language

Conditions

Revise the label as follows:

1.) The label cannot support two separate signal words. You must delete the "For Use Dilution" Precautionary statements and corresponding Signal Word. Alternatively, revise the original "Precautionary Statements" by adding the following statement after the last statement in the section in italics:

"After the product is diluted, safety goggles are not required."

2.) Delete the "Use Dilution" First Aid statement.

3.) Revise the "Pesticide Disposal" statement on page 3 to read "Waste resulting from the use of this product must be disposed of on site or at an approved waste disposal facility."

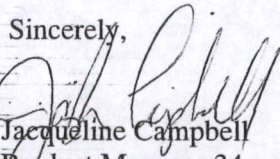
General Comments

A stamped label with conditions is enclosed for your records. Submit 1 copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

CONCURRENCES

SYMBOL	DATE	NAME						

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 308-6440 or by email at grigsby.stacey@epa.gov. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

Jacqueline Campbell
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: stamped label

CONCURRENCES

SYMBOL	DATE	INITIALS	DATE	INITIALS	DATE	INITIALS	DATE	INITIALS

Antimicrobial Fruit & Vegetable Treatment Water Additive for Pathogen Reduction in Fruit and Vegetable Wash or Process Waters

Controls the Growth of Spoilage and Decay Causing Non-Public Health Microorganisms
on Fruit and Vegetable Surfaces and in Wash or Process Waters
Antimicrobial Fruit and Vegetable Wash

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAY - 2 2012

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

Active Ingredients:

Dodecylbenzenesulfonic acid, sodium salt1.23%
Lactic Acid.....17.29%

Other Ingredients:.....81.48%

Total:.....100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Concentrate: WARNING: Causes substantial but temporary eye injury. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Wear goggles, face shield, or safety glasses. 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 eyes.
- 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.

For Use Dilution:

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes or 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. After product is diluted in accordance with the directions for use safety glasses are not required.

1677-234

Use Dilution**If on Skin or Clothing:**

- Take of contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a Poison Control Center or doctor for treatment advice.

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

When used as directed Antimicrobial Fruit & Vegetable Treatment will:

1. Reduce 99.9% of the pathogens *Escherichia coli* O157:H7 (ATCC 43895, 35150, 43890), *Listeria monocytogenes* (ATCC 49594, 19114, 19116) and *Salmonella enterica* (ATCC 10721, 6962, 13311) in wash or process water for fruit and vegetable raw agricultural commodities (RACs).
2. Controls spoilage and decay causing non-public health microorganisms present in the wash or process for fruit and vegetable raw agricultural commodities.
3. Controls the growth of spoilage and decay causing non-public health microorganisms on fruit and vegetable surfaces.

Areas of use: Food retail establishments such as restaurants, cafeterias, food service operations, commissaries, and kitchens.

DIRECTIONS FOR USE:

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

Dilute Antimicrobial Fruit & Vegetable Treatment into the processing vessel according to the table below, submerge and agitate fruits and vegetables for a minimum of 90 seconds. Drain thoroughly and allow to air dry.

Minimum Contact Time	Ounces of concentrate per gallon of water	Dilution ratio (parts concentrate : parts water)	Active ingredients	
			ppm SDBS*	ppm Lactic Acid
90 seconds	0.75 – 1.00	1:170 – 1:128	76 – 111	1061 – 1391

* Sodium dodecylbenzenesulfonate

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Refer to the Antimicrobial Fruit & Vegetable Treatment package insert for the recommended list of fruits and vegetables.

STORAGE AND DISPOSAL:

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

PESTICIDE STORAGE: Store in a cool, dark, dry place in the original container. Always replace covers.

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: Non-refillable container. Do not reuse this container to hold materials other than pesticides or diluted pesticide rinsate. Offer for recycling if available or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

RESIDUE REMOVAL INSTRUCTIONS: For containers less than 5 gallons. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Fill container ¼ full with water and recap. Shake 10 seconds. Follow Pesticide Disposal instructions for rinsate disposal. Drain for 10 seconds after the flow begins to drip. Repeat procedure two more times.

RESIDUAL REMOVAL INSTRUCTIONS: For containers greater than 5 gallons. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Fill container ¼ full with water. Tip container on its side and roll back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over its other end and tip back and forth several times. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times.

FOR COMMERCIAL USE

Net Contents:

- 96 oz.
- 1 U.S. Gal. (3.78 L)
- 2.5 U.S. Gal. (9.46 L)
- 4 U.S. Gal. (15.14 L)
- 30 U.S. Gal. (113.56 L)
- 50 U.S. Gal. (189.27 L)

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

EPA Reg. No. 1677-234

EPA Est. No.: 1677-MN-1 (P), 60156-IL-1 (SI), 1677-CA-2 (R), 1677-TX-1 (D), 1677-IL-2 (J), 1677-CA-1 (S), 1677-GA-1 (M), 1677-WV-1 (V)
Superscript refers to first letter of date code

Optional Marketing Language:
"See side/back panel for First Aid..."

Package Insert

**Antimicrobial Fruit & Vegetable Treatment
Water Additive for Pathogen Reduction in
Fruit and Vegetable Wash or Process Waters**

**Controls the Growth of Spoilage and Decay Causing Non-Public Health Microorganisms
on Fruit and Vegetable Surfaces and in Wash or Process Waters
Antimicrobial Fruit and Vegetable Wash**

When used as directed Antimicrobial Fruit & Vegetable Treatment will:

1. Reduces 99.9% of the pathogens *Escherichia coli* O157:H7 (ATCC 43895, 35150, 43890), *Listeria monocytogenes* (ATCC 49594, 19114, 19116) and *Salmonella enterica* (ATCC 10721, 6962, 13311) in wash or process water for fruit and vegetable raw agricultural commodities (RACs).
2. Controls spoilage and decay causing non-public health microorganism present in the wash or process water for fruit and vegetable raw agricultural commodities.
3. Controls the growth of spoilage and decay causing non-public health microorganisms on fruit and vegetable surfaces.

Antimicrobial Fruit & Vegetable Treatment can be applied to the following types of fresh fruit, post harvest.

Vegetables

- Root and tuber vegetables such as carrot, potato, radish, rutabaga, sweet potato, yam and sugar beets.
- Leaves of root and tuber vegetables such as turnip greens and sugar beet
- Bulb vegetables such as onions, leeks, garlic and shallots.
- Leafy vegetables such as lettuce (head and leaf), celery, fennel, endive, escarole, parsley, radicchio, rhubarb, spinach
- *Brassica* leafy vegetables such as broccoli, brussel sprouts, cabbage, cauliflower, collards, kale, kohlrabi, mustard greens, mustard spinach and turnips.
- Legumes (succulent) such as beans, peas and alfalfa.
- Fruiting vegetables such as pepper (bell, pimento, hot, sweet), tomato, tomatillo and eggplant.
- Cucurbits such as cucumber, melon (crenshaw, honeydew, honey ball, mango, pineapple, watermelon), summer squash, pumpkins and winter squash.

Fruits

- Citrus fruits such as sweet orange, sour orange, lemon, lime, tangelo, tangerine, mandarin, citrus citron, kumquats and grapefruit.
- Pome fruits such as apples and pears
- Stone fruits such as sour and sweet cherry, peach, nectarine and plum.
- Small fruits and berries such as blackberries, blueberries, boysenberries, red and black raspberries and strawberries.

Herbs and spices such as basil, chives, dill, oregano, rosemary, sage, savory and thyme.

Miscellaneous such as apricots, artichoke, cranberry, dates, figs, grapes, guava, kiwi, mango, mushrooms, okra, olives, persimmons, pomegranate and watercress.