

## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

June 24, 2025

Jennifer DePietro Sr. Regulatory Assurance Specialist Arxada, LLC

Electronic Transmittal: jennifer.depietro@arxada.com

Subject: Condition of Registration and Updated Label – Storage Stability and Corrosion

Characteristics Data review (MRID 52164601) and updated label notification to include the expiration date to support the storage stability for up to 10-months.

Product Name: Hydrite PAA HP 4.9:26.5 Product Name: NUGEN EHP D32 MUP EPA Registration Number: 6836-515

Received Date: 12/14/2023 Action Case Number: 00495562

#### Dear Jennifer DePietro:

The Agency has reviewed the SSCC study submitted (MRID 52303801) to fulfill the conditional data requirement referred to above, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act. A copy of the review is enclosed.

The one-year corrosion characteristics study has demonstrated no corrosion of the storage containers and the requirements for guideline 830.6320 has been met and is satisfied.

The guideline (830.6317) for the storage stability have been met and satisfied for up to 10-month only. Therefore, the product requires an expiration date and must be used within 10 months of the manufacturing date.

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

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The label submitted with the application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Assurance.

If you have any questions, please contact Srinivas Gowda by via email at gowda.srinivas@epa.gov.

Sincerely,

Steven Snyderman, Product Manager 33 Regulatory Management Branch II Antimicrobials Division (7510M) Office of Pesticide Programs

Steven Inyderman

**Enclosure:** Product Chemistry Review for NUGEN® EHP D32 MUP, EPA Reg. No.: 6836-515, Action Code Case No.: 00495562, Dated April 29, 2025.

# **NUGEN® EHP D32 MUP**

FOR MANUFACTURING-USE ONLY

Active ingredient:	
Hydrogen peroxide	7.6%
Other ingredients:	92.4%
Total	100.0%

# DANGER [PELIGRO]

[See [left] [side] [right] [back] panel for Precautionary Statements]

{Note to Reviewer: In accordance with 40 CFR 156.68(d), all first aid statements, as prescribed, will appear on the front panel of the label.}

#### **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 SWALLOWED:** Call a poison control center or doctor 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For general information on product use, etc., call the National Pesticides Information Center at 1-800-858-7378. You may also contact the poison control center at 1-800-222-1222 for emergency medical treatment information.

[See [left] [side] [right] [back] panel for Precautionary Statements]

EPA Reg. No. 6836-515

EPA Est. No. (as indicated on container) Net Contents: (insert container size here)

[Lot code] [Batch code]: (insert Lot code OR Batch code) [Digits within the dashes of the [Lot code] [Batch code] [(XXX-XXXXXX-XX)] designates the manufacturing date MM, DD, YY.]

Product must be used within 10 months of the manufacturing date listed [in] [on] [the] [batch code] [lot code] [date] [label] [container].

Manufactured by: Arxada, LLC 412 Mount Kemble Avenue Suite 200S Morristown, NJ 07960

# NOTIFICATION

6836-515

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

06/24/2025

NUGEN® EHP D32 MUP EPA Reg. No. 6836-515 EPA Submission 2025-05-09

#### PRECAUTIONARY STATEMENTS

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER. CORROSIVE.** Causes irreversible eye damage and skin burns. Harmful if swallowed or if absorbed through skin. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, coveralls over a long-sleeved shirt and long pants, socks, chemical-resistant footwear, and waterproof gloves. When mixing and loading wear a chemical-resistant apron. 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

{If container size is 5 gallons or larger, the following Environmental Hazards statements will be used:}
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 the 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.

#### PHYSICAL OR CHEMICAL HAZARDS

Strong oxidizing agent. Do not use or store near heat or open flame.

{If the following Spanish statement is used, it must appear directly above DIRECTIONS FOR USE.} Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. [If you do not understand the label, find someone to explain it to you in detail.]

#### **DIRECTIONS FOR USE**

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

For formulation into antimicrobial/disinfectant products for use on hard, non-porous non-food contact surfaces in: businesses and office buildings, hotels, motels, correctional facilities, athletic facilities, schools, barber shops, locker rooms, non-food areas of food-processing plants and restaurants, bars and cafeterias, public restrooms, animal laboratories, pet shops, factories and medical facilities including; hospitals, clinics, nursing homes and other medical offices.

Formulated products must be registered with the EPA. Formulators using this product are responsible for providing data for the EPA registration of their formulated product. This product may be used to formulate products for specific use(s) not listed on this label if the formulator or primary registrant has complied with U.S. EPA data requirements regarding the support of such use(s).

{Note to reviewer: For Nonrefillable Containers}

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

#### PESTICIDE STORAGE

Do not store on side. Avoid creasing or impacting of side walls.

#### PESTICIDE DISPOSAL

Pesticide wastes may be 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 HANDLING**

{For containers that are ≤ 5 gallons}

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple Rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Drain for 10 seconds after the flow begins to drip. Follow Pesticide Disposal instructions for rinsate disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

# {For containers that are > 5 gallons or 50 lbs.}

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple Rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Follow Pesticide Disposal instructions for rinsate disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.