



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUN 30 2008

EnviroTech Chemical Services
500 Winmoore Way
Modesto, CA 95358

Attention: Jon Anderson
Regulatory Manager

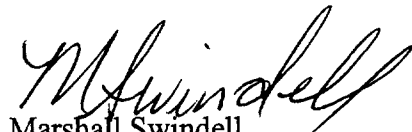
Subject: PERASAN 'A'
EPA Reg. No. 63838-1
Amendment Application Date: September 4, 2007

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable, provided the following label revision is inserted:

- On page 3, under the FOAM CLEANING OF FOOD AND NON-FOOD CONTACT SURFACES section, delete the last sentence "A sanitizing rinse is optional". Since this claim states foam cleaning as a food contact sanitizer, the optional water rinse statement must be deleted.

If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062.

Sincerely,


Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510C)

PERASAN® 'A' (Antimicrobial Solution)

FOR USE IN ORGANIC PRODUCTION

PERASAN® 'A' is a peroxyacetic acid-based sanitizer/disinfectant developed for the following uses:

Institutional/Industrial Sanitizer and Disinfectant for Previously Cleaned Hard Non-Porous Food Contact Surfaces in: Dairies, Wineries, Breweries, Food and Beverage Plants, Poultry and Egg Facilities, and Animal Housing.

Hard, Non-Porous Surface Disinfection in: Hospitals, Schools, Industrial Facilities, Office Buildings, Veterinary Clinics.

Bacteria, Slime, Odor and Algae Control in: Recirculating Cooling Water and Evaporative Coolers, Reverse Osmosis, Nano and Ultra Filtration, and Agricultural Waters.

Active Ingredients:

Peroxyacetic Acid	5.6%
Hydrogen Peroxide	26.5%

Inert Ingredients:	67.9%
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Total:	100.0%
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ACCEPTED
with COMMENTS
in EPA Letter Dated
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Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

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EPA Registration No. 63838-1
EPA Est. No. 63838-CA-01

Before Using This Product, Please Read This Entire Label Carefully

KEEP OUT OF REACH OF CHILDREN
DANGER

FIRST AID

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.
IF ON SKIN OR CLOTHING	Take off contaminated clothing and shoes. Rinse skin immediately with plenty of soap and water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
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 INHALED	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice.
QUESTIONS ? 1-209-581-9576	Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
NOTE TO PHYSICIAN:	Probable mucosal damage may contraindicate the use of gastric lavage.

Manufactured By:

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. Do not enter an enclosed area without proper respiratory protection. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. Do not breathe vapors or spray mist. Do not get in eyes, on skin, or on clothing. Wear goggles and face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse.

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Physical or Chemical Hazards

STRONG OXIDIZING AGENT. CORROSIVE. Mix only with potable water at 60-80° F. Product must be diluted in accordance with label directions prior to use. PERASAN® 'A' is not combustible; however, at temperatures exceeding 156°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion.

Environmental Hazards:

This pesticide is toxic to birds, fish and aquatic invertebrates. Caution should be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of the National Pollution Discharge System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage plant authority.

DIRECTIONS FOR USE

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

SANITIZATION

PERASAN® 'A' peroxyacetic acid sanitizer is recommended for use on precleaned surfaces such as equipment, pipelines, tanks, vats, filters, evaporators, pasteurizers, and aseptic equipment in dairies, breweries, wineries, beverage and food processing/packing plants, egg processing/packing equipment surfaces, and eating establishments. This product is effective as a sanitizer when solution is prepared in water of up to 400 ppm hardness as CaCO₃. This product has demonstrated greater than 99.999% reduction of organisms after 60 seconds exposure period in the AOAC Germicidal and Detergent Sanitizing Action of Disinfectants study.

NOTE: FOR MECHANICAL OPERATIONS prepared use solution may not be reused for sanitizing but may be reused for other purposes such as cleaning.

FOR MANUAL OPERATIONS fresh sanitizing solutions should be prepared daily or more often if the solution becomes diluted or soiled.

SANITIZING FOOD CONTACT SURFACES:

This product can be used in Federally Inspected Meat and Poultry Facilities as a sanitizer.

Prior to sanitizing, remove gross food particles, then wash with a detergent solution, followed by a potable water rinse. Sanitize with a concentration of 1.0-2.4 oz. PERASAN® 'A' dissolved in 6 gallons of water (0.13%-.31% v/v concentration, or 82-197 ppm active peroxyacetic acid). At this dilution PERASAN® 'A' is effective against Staphylococcus aureus, Escherichia coli, Salmonella choleraesuis, and Listeria monocytogenes.

Use immersion, coarse spray or circulation techniques as appropriate to the equipment. All surfaces should be exposed to sanitizing solution for a period of at least 60 seconds or more if specified by a governing code. Drain any excess solution. Do not rinse.

SANITIZATION OF CONVEYORS AND EQUIPMENT FOR MEAT, POULTRY, SEAFOOD, FRUIT, NUTS AND VEGETABLES:

PERASAN® 'A' is effective against the gram negative and gram positive organisms Staphylococcus aureus, Salmonella choleraesuis, Escherichia coli and Listeria monocytogenes.

For use in the static or continuous sanitizing, washing or rinsing of conveyors, slicers, saws, and equipment, apply a solution of this product using 1.0-2.4 oz. per 6 gallons of water (82 ppm to 197 ppm active peroxyacetic acid).

Apply sanitizer solution to the return portion of the conveyor or equipment using coarse spray or similar means of

wetting surfaces, so as to affect draining and prevent puddling. Allow sanitizer to thoroughly wet surface for a minimum 60 seconds contact time. No rinse is needed.

SANITIZING OF CASING, SHELL OR HATCHING EGGS:

To sanitize clean shell eggs intended for food or food products, spray with a solution of PERASAN® 'A' by diluting 1.0-2.4 oz. product with 6 gallons of potable water (providing 82-197 ppm peroxyacetic acid). The solution must be equal to or warmer than the eggs, but not to exceed 130° F. Wet eggs thoroughly and allow to drain. Eggs that have been sanitized with this product may be broken for use in the manufacture of egg products without a prior potable water rinse. Eggs must be reasonably dry before casing or breaking. The sanitizing solution must not be reused for sanitizing eggs. For hatching eggs apply the sanitizing solution as eggs are gathered or prior to setting using a coarse spray or flood so as to lightly wet egg shell surfaces. Allow to drain dry.

SANITIZING EATING, DRINKING AND FOOD PREP UTENSILS:

Remove gross food particles by a prescrape, a preflush and when necessary, a presoak treatment. Wash with a recommended detergent. Rinse with clean water.

Sanitize using a solution of 1.0 oz. PERASAN® 'A' dissolved in 6 gallons of water. Immerse all utensils for at least 60 seconds or contact time specified by a governing sanitary code. Drain excess solution.

SANITIZING TABLEWARE:

For sanitizing tableware in low temperature warewashing machines, inject PERASAN® 'A' into the final rinse water at a concentration of 1.0 oz. PERASAN® 'A' dissolved in 6 gallons of water. Do not exceed 0.13 % v/v. Air dry. To insure that PERASAN® 'A' sanitizer concentration does not fall below 0.1%, periodically test the rinse solution with a suitable test kit and adjust the dispensing rate accordingly. Consult your technical service representative for assistance and further information on sanitizing tableware in warewashing machines.

FOGGING IN FILLING, PACKAGING, AND DISPENSING ROOMS OR AREAS:

PERASAN® 'A' is used as an adjunct to acceptable manual cleaning and disinfection of room surfaces. Prior to fogging remove food products and packaging materials from the room or area or carefully protect them. Fog desired areas using one quart of a 0.3% to 1.5% solution of this product (2 oz. to 10 oz PERASAN® 'A' per 5 gallons of water) per 1000 cu. ft. of room area. Conventional corrosion resistant fogging devices are recommended. Vacate the area of all personnel prior to, during and after fogging until the hydrogen peroxide concentration is below 0.5 ppm, or there is no strong odor present, characteristic of acetic acid. Allow surfaces to drain thoroughly before operations are resumed. For food contact surfaces, concentrations above 2.4 oz. of this product per 6 gallons of water require a sterile or sanitizing rinse prior to resuming operations.

FINAL SANITIZING BOTTLE RINSE:

PERASAN® 'A' may be used as a final sanitizer rinse, followed by adequate draining, for returnable and non-returnable bottles at a 0.13%-0.31% dilution (1.0 oz.-2.4 oz PERASAN® 'A' in 6 gallons of water), which yields 82 ppm-197 ppm active peroxyacetic acid.

ANTIMICROBIAL RINSE OF PRECLEANED OR NEW RETURNABLE OR NON-RETURNABLE CONTAINERS:

To reduce the numbers of beverage spoilage organisms, including *Byssoschlamys fulva*, *Aspergillus niger*, and *Bacillus subtilis* use a 2% to 3% v/v solution, which equals 1120-1700 ppm peroxyacetic acid (2.5-3.8 oz. to 1 gallon of water) of PERASAN® 'A' at a temperature range of 46°-60° C for 15 seconds. Higher dilutions of 1 oz. per gallon of water is effective against *Aspergillus niger* and *Byssoschlamys fulva* at 60° C. After adequate draining, rinse interior container surfaces with sterile or potable water.

FOAM CLEANING OF FOOD AND NON-FOOD CONTACT SURFACES: (not for use in California)

As an adjunct to cleaning and sanitizing procedures PERASAN® 'A' sanitizer/disinfectant may be added to PERAFOAM™ and foamed on environmental or equipment surfaces using conventional foam-generating equipment. The resultant foam blend can be used on equipment, floors, walls, ceilings, drains, etc and should be left on surface for a minimum of 1 minute or longer. On food contact surfaces do not exceed 2.4 oz of PERASAN® 'A' per 6 gallons of water. **Directions for mixing:** Manually or mechanically blend 1-2.4 fl. oz of this product and 6-12 fl. oz. of PERAFOAM™ (foam additive) per 6 gallons of water. The dilution water should not exceed 150° F.

NON FOOD CONTACT HARD SURFACE DISINFECTION:

Combination Disinfection and Cleaning:

PERASAN® 'A' disinfects as it cleans in one operation. PERASAN® 'A' can be used to disinfect floors, walls and other hard nonporous surfaces such as tables, chairs, countertops, bathroom fixtures, sinks, bed frames, shelves,

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racks, carts, refrigerators, coolers, tile, linoleum, vinyl, glazed porcelain, and use sites on this label made of plastic, stainless steel, or glass. Areas of use in hospitals use PERASAN® 'A' for surgical and obstetrical suites; housekeeping services; physical therapy departments; nursing services; autopsy facilities. Also use PERASAN® 'A' in nursing homes, other health-care facilities, schools, colleges, veterinary clinics, animal life science laboratories, industrial facilities, dietary areas, office buildings, recreational facilities, retail and wholesale establishments.

PERASAN® 'A' is effective against *Staphylococcus aureus*, *Salmonella choleraesuis*, *Pseudomonas aeruginosa*, *Trichophyton mentagrophytes* and *Escherichia coli* O157:H7 at 0.23%-3% v/v (1.5-20 oz./5 gal.) in hard water (400 ppm as CaCO₃) and 5% organic soil loading on hard nonporous surfaces. For heavily soiled areas a pre-cleaning step is required, followed by a potable water rinse. Apply solution with a mop, cloth, sponge, brush, etc... or by soaking or immersion so as to wet all surfaces thoroughly. Allow to remain wet for 10 minutes, then remove solution and entrapped soil with a clean wet mop, cloth, wet vacuum pickup, or by draining. Surfaces that may directly or indirectly contact food must be rinsed with potable water before operations resume. A rinse for non-food contact surfaces is optional. Prepare a fresh solution daily or when it becomes soiled or diluted.

DISINFECTION OF ANIMAL AND POULTRY PREMISES, TRUCKS, COOPS AND CRATES:

PERASAN® 'A' is designed for use in animal hospitals, animal laboratories, kennels, pet shops, zoos, pet animal quarters, poultry premises, poultry hatcheries, and livestock quarters. When used as directed, PERASAN® 'A' is specifically designed to disinfect, deodorize and clean inanimate, hard, surfaces such as walls, floors, sink tops, furniture, operating tables, kennel runs, cages and feeding equipment. In addition PERASAN® 'A' will deodorize those areas which are generally hard to keep smelling fresh, such as garbage storage areas, empty garbage bins and cans, and any other areas which are prone to odors caused by microorganisms.

Disinfection of Poultry Premises:

For heavily soiled areas, a pre-cleaning step is required. Prepare a fresh solution for each use.

Remove all poultry and feeds from premises, trucks, coops and crates. Remove all litter and droppings from floors, walls and surfaces of facilities occupied or traversed by poultry. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with a detergent and rinse with water. Saturate surfaces with a 0.31-1.25% v/v (2.0-8.0 oz./5gal.) solution of PERASAN® 'A' for a period of 10 minutes. Thoroughly scrub treated feed racks, troughs, automatic feeders, fountains and waters with a detergent and rinse with potable water before reuse. Ventilate buildings, coops and other closed spaces. Do not house poultry or employ equipment until treatment has been absorbed, set or dried.

All treated equipment that will contact food, feed, or drinking water must be rinsed with potable water before reuse. See your technical representative for specific recommendations for all cleaning and rinsing requirements.

Disinfection And Deodorizing Of Animal Housing Facilities (Barns, Kennels, Hutches, Etc.):

Remove animals and feed from premises, vehicles, and enclosures. Remove litter, waste matter from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks and other feeding and watering equipment. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate surfaces by applying a 0.31% (2.0 oz./5 gal.) solution of PERASAN® 'A' with a mop, brush or coarse spray. Wet all surfaces and allow to remain wet for 10 minutes. Immerse all halters, ropes, and other types of equipment used in handling and restraining animals, as well as forks, shovels and scrapers used for removing litter and manure. Ventilate buildings and other closed spaces. Do not house livestock or employ equipment until treatment has been absorbed, set, or dried. Thoroughly scrub all treated feed racks, mangers, troughs, automatic feeders, fountains and waterers with soap or detergent, and rinse with potable water before reuse.

CONTROL OF SLIME FORMING BACTERIA IN RECIRCULATING AND COOLING WATER SYSTEMS (COOLING TOWERS, EVAPORATIVE CONDENSERS, PASTEURIZERS AND AIR WASHERS):

Severely fouled systems should be cleaned before adding the PERASAN® 'A' solution. PERASAN® 'A' should be added in the system directly and not mixed with any other chemicals or additives. Discontinue the use of chlorine or bromine products prior to using this product. Contamination with other chemicals could result in product decomposition. Add PERASAN® 'A' at a point in the system where uniform mixing and even distribution will occur. For slug treatment add 20 oz. of product per 1000 gallons of process water. Repeat as necessary until microbiological control is evident. Thereafter, to maintain control, use 0.3 to 1.5 lbs. (4.0-17.5 fl. oz.) of PERASAN® 'A' per 1000 gallons of process water (2-9 ppm active peroxyacetic acid) as a continuous or intermittent slug treatment. Continuous dosing methods usually require 2-5 ppm active peroxyacetic acid (4.0-17.5 fl. oz. per 1000 gal of process water) to achieve adequate control.

AIR WASHERS: This product may be used to control bacteria and biofouling in industrial air washing/scrubbing systems. The air washer must have operational and effective mist elimination systems. Prior to use of this product, heavily fouled systems must be pre-cleaned using the appropriate cleaner. Continuous dosing methods will require

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2-7 ppm and intermittent dosing methods require 7-14 ppm (as peroxyacetic acid), as described in the previous paragraph, depending on the type of system and the level of microbiological control desired.

REVERSE OSMOSIS (RO), NANO, AND ULTRA FILTRATION CLEANING-SANITIZATION:

PERASAN® 'A' may be used in the sanitization of nano filtration (NF) and ultra filtration (UF) and reverse osmosis (RO) membranes and their associated piping systems. This product may be added continuously in food, beverage, and drinking water systems for RO (reverse osmosis) systems only and in accordance with the instructions below. This product is not for use in kidney dialysis equipment. This product may not totally eliminate all vegetative microorganisms in RO or NF or UF membranes and their associated piping systems due to their construction or assembly, but can be relied upon to reduce the number of microorganisms to acceptable levels when used as directed. Prior to using this product check with membrane manufacturer to confirm compatibility of membranes with various types or concentration of peroxyacetic acid solutions.

Batch Sanitation of NF, UF and RO Systems: Isolate incompatible equipment, such as carbon filters and ion exchangers. Clean system with an appropriate cleaner and follow with RO permeate water or potable water. Remove mineral deposits if necessary with an acidic cleaner, and rinse as before. Fill entire system with water and add up to 1% of this product by volume (620 ppm peroxyacetic acid) for heavily fouled systems. The typical sanitation use solution dosing of this product is 1-2 oz. per 5 gallons of water (98-195 ppm peroxyacetic acid). Recirculate the sanitizing solution through the piping and membrane system at 20° C for 10 minutes minimum, or up to 4 hours, depending on the severity of cleaning to be done. Open and close process valves and solenoids to be sure all parts are in contact with the solution. For occasional intermittent feed, do not exceed 98 ppm active peroxyacetic acid, which equals 1 oz. of this product per 5 gallons of feed water. Do not use the intermittent feed method for on-line use for potable water or direct food contact systems. Rinse the system with RO permeate or potable water until residual peroxygen concentration is below 1 ppm.

RO Continuous or Intermittent Addition: For continuous addition methods for RO systems, use 2-5 ppm active peroxyacetic acid (36-90 ppm as product), which equals 1.8-4.5 oz. PERASAN® 'A' per 430 gallons of process water. For occasional intermittent feed, do not exceed 98 ppm active peroxyacetic acid, which equals 1 oz. of this product per 5 gallons of feed water. Do not use the intermittent feed method for on-line use in potable water or direct food contact systems.

FRUIT AND VEGETABLE WATER TREATMENT:

This product may be used to help control spoilage or decay-causing bacteria and fungi in water or ice that contacts raw, unprocessed fruits and vegetables. The commodity should be continuously sprayed, using coarse spray, or submerged using a solution containing 1 oz. PERASAN® 'A' per 20 gallons of water. Adjust dose as necessary to maintain no more than 25 ppm active peroxyacetic acid. Remove excess water or allow to drain. If using the submersion method, replace with a fresh solution as necessary, or when it becomes visibly soiled. A final potable water rinse is not necessary.

AGRICULTURAL or HORTICULTURAL USES:

There is a Restricted-Entry-Interval of zero (0) hours after the use of this product. This product should never be mixed or combined with any other pesticide or fertilizer. Upon soil contact this product decomposes rapidly to oxygen, carbon dioxide and water. This product may be harmful to fish if exposed on a continuous basis at concentrations of 0.5 ppm or more of active peroxyacetic acid. Meter this product into pressurized pipes using a plastic or stainless steel injection/backflow device installed far enough upstream from the target equipment to ensure thorough mixing. For open flowing bodies of water, apply this product as far upstream as possible to allow adequate mixing prior to the flow entering any larger body of water. If open pouring of this product is required pour product as close to the surface of the water as possible to reduce odor exposure.

Treatment of Irrigation Water Systems (sand filters, humidification systems, storage tanks, ponds, reservoirs, canals): For the control of odor, sulfides, slime and algae in water systems, apply this product at 2 oz. per 100 gal of water (10 ppm peroxyacetic acid). This feed rate equals 1.5 gal per 10,000 gallons of water. Repeat dose as necessary to maintain control, which will vary with seasonal conditions. For prevention of algae some systems may require continuous low level dosing during warm sunny periods.

Drip Irrigation System Cleaning: To clean slime and algae from drip system tapes and emitters, meter this product upstream from pumps or filters at the rate of 1-2 oz per 50 gallons of water (10-20 ppm peroxyacetic acid). This feed rate equals 1.5-3 gal per 10,000 gallons of dilution water. When required, during normal irrigation cycles, use this product at the recommended dose for a minimum of 30 minutes. Thereafter, the irrigation cycle should be discontinued and the line should not be flushed.

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NOTE: This product at its use dilution is compatible with stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

Storage and Disposal

Storage: Never return PERASAN® 'A' to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents, and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of a decomposition, isolate container, douse container with cool water and dilute PERASAN® 'A' with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F.

Procedure for Leak or Spill: Stop leak if this can be done without risk. Shut off ignition sources: no flames, smoking, flares, or spark producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material should not enter confined spaces.

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 by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or Hazardous Waste representative at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods of disposal may vary by location, regulatory agencies should be contacted prior to disposal. PERASAN® 'A' which is to be discarded, should be disposed of as hazardous waste after contacting the appropriate local state or Federal agency to determine proper procedures.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Offer for recycling if available. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 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. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

PERASAN® 'A'

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