Enviro Tech Chemical Services, Inc
10 500 Winmoore Way
Modesto, California 95358

Attention: Michael S. Harvey

Subject: Reflex
EPA Reg. No. 63838-12
Amendment Letter dated March 14, 2013

You request to change the following:

- “Mix only with water at ambient (room) temperature” to “Mix only with potable water below 140°F” under the Physical or Chemical Hazards section of the label.
- Change “Dilute 1.0 fl. Oz of this product in 6 gallons of water. Solutions up to 1.0 fl oz per 4 gallons of water may be used.” to “Dilute 1.0-3.0 fl. Oz of this product in 6 gallons of water,” per 40 CFR 180.1196. Additionally, changing “The pH of this product at 1.0 fl. Oz. per 6 gallons (v/v) of 200ppm (11 grain) hard water will be approximately 3.3-3.6” to “The pH of this product at 1.0-3.0 fl. Oz. per 6 gallons (v/v) of 200 ppm (11 grain) hard water will be approximately 2.0-3.6”.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), Section 3(c)(5), is acceptable.

If you have any questions concerning this letter, please contact Elizabeth Hernandez at (703) 347-0241.

Sincerely,

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510P)
PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER CORROSIVE: Do not enter an enclosed area where this product has been applied 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. Wash face shield, protective clothing and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

Physical or Chemical Hazards
Strong oxidizing agent. Corrosive. Mix only with pool water below 140°F. Product may be ignited in accordance with local codes and regulations. HAZARDOUS TO USE: Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters in accordance with the requirements of the 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 into sewer systems without previously notifying the local sewage plant authority.

Storage and Disposal
Storage: Never return REFLEX to the original container after it has been removed. Avoid all containers, especially dirt, caustic, reducing agents, and iron or yellow metals. Contamination and impurities will reduce shelf life and can decompose. In case of decomposition, isolate container; dangerous conditions may exist. Do not store in direct sunlight. Do not handle with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

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 in accordance with the requirements of the 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 into sewer systems without previously notifying the local sewage plant authority.

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 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 INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth. Call a poison control center or doctor for treatment advice.

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

Keep the product container, label, or MSDS with you when calling a poison control center or a doctor, or going for treatment advice. For emergency information on this product, call the National Poisonous Information Center at 1-800-528-1778, 9:30 AM to 5:30 PM EST. During the National Poisonous Information Center at 1-800-222-1222. Both numbers are 7 days/week.

(refresh for Use continued)
For Food/Beverage, Wine and Dairy Processing Equipment, Tanks, Vats, Pipes, and Closed Systems:
Remove gross food particles and soil by a preflush or presoak, and when necessary, a pre-soak treatment. Clean all surfaces with an appropriate cleaning product, followed by a potable water rinse prior to the application of this product. Sanitize CIP or COP equipment by immersion, circulation or coarse spray sanitizing techniques, as appropriate.

Dilution Instructions: Dilute 1.0-3.0% of this product in 6 gallons of water. Do not exceed 140°F of the sanitizing solution. Expose equipment to the sanitizing solution for a minimum of 1 minute. Increased circulation times will improve microbiological and/or mineral scale removal results. Adequately drain solution from equipment before resuming operations. A water rinse is not necessary. For mechanical operations the prepared use solution may not be re-used for sanitizing, but may be recycled for other uses such as cleaning, flushing or bulk water pH control for other non-sanitizing purposes.

Adjust the sanitizer solution to achieve pH values in the preferred range of pH 2.5-4. If millstone or mineral scale removal is required. The regular use of this product at the recommended pH ranges will prevent the formation of milkstone, beerstone, or mineralstone deposits on food contact surfaces. The pH of this product at 1.0-3.0% solution 6.0% per 6 gallons (67%) of 200 ppm (11 grain) hard water will be approximately 2.0-3.6.

Final Sanitizing Beverage Container Rinse: This product may be used as a final sanitizer rinse for returnable and non-returnable beverage containers. Allow for adequate draining after the sanitizing rinse. Use this product at 1.3-3.0% oz per 4-6 gallons of water.

Combination Cleaning/Descaling and Sanitization For Reverse Osmosis and Other Filtration Systems: This product may be used for all types of industrial and potable water RO, UF and other similar membrane filtration systems for the dual purpose of simultaneous descaling and sanitization objectives in systems for off-line use. This product is not for use on kidney dialysis equipment.

Prior to treatment with this product, alkaline clean membranes by following manufacturer or service company’s instructions. Isolate incompatible equipment including all soft metals, charge system with raw, and add additional product as necessary to keep the pH below 4, as required by the manufacturer/service company. Be sure to open and close remote valves during the treatment process to assure all surfaces are contacted with the treatment solution. When this treatment is completed, drain or purge the system and then resubmit normal operations. If using dilutions stronger than 1.0 oz per 4 gal of water, the system needs to be flushed with process water before resuming operations.

Note: This product is highly acidic, do not use with or around chlorinated products. REFLEX is safe to use on stainless steel and most plastics. Do not use this product in systems that contain copper, brass, aluminum, cast iron or mild steel, as severe corrosion or acid production will occur.

This product degrades with age depending on the storage conditions and temperature. The product's shelf life is shortened and must be disposed of by expiration date. Return a POTENTIALLY TOXIC PRODUCT AWAY FROM HEAT OR DIRECT SUNLIGHT. Use a peroxycatic acid test kit and increase dosages as necessary to obtain the required level of active ingredients. As a reference, a fresh solution should contain about 90 ppm or more peroxycatic acid at 1.0-3.0% of the process water.

EPA Registration No. 63838-12
EPA Establishment No. 63838-CA-01
EPA Accepted
Hydro Tech Chem. Svcs. Inc. 209-581-9576
580 Winnbrooke Way, Modesto, CA 95358

Ro, Code 317-V5


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