

63838-12

6/21/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

JUN 21 2013

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 prodeuct 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,

A handwritten signature in black ink that reads "M Swindell".

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. Wear 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 potable water below 140° F. Product must be diluted in accordance with label directions prior to use. REFLEX is not combustible; however, at temperatures exceeding 160°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 in accordance with the requirements of the National Pollutant Discharge Reduction 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 contaminants, especially dirt, caustics, reducing agents, and iron or yellow metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute REFLEX with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. To maintain product quality, store this product in a cool, dry area, away from direct sunlight and heat.

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. If material has been spilled, an acceptable method of disposal is to sprinkle the area with soda ash, then 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.

Pesticide Disposal: Non refillable container. Do not use this container to hold materials other than pesticides or dilute pesticides (rinseates). After emptying and cleaning, it may be allowable to temporarily hold rinseate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. REFLEX, which is to be discarded, should be disposed of as per proper procedures.

Container Disposal: >5 gallon plastic drums: Clean container promptly after emptying. 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 container on its end and insert a mix tank or store rinseate for later use or disposal. Repeat this procedure two more times. 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.

Directions For Use

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

This product passes the EPA food contact sanitizer test for previously cleaned, hard, non-porous food-contact surfaces (AOAC Germicidal and Detergent Sanitizing Action of Disinfectants) against *Staphylococcus aureus* and *Escherichia coli* when used as recommended.

Rev. Code 037-V5

REFLEX™

(ACID SANITIZER)

REFLEX is a phosphate-free peracetic acid / nitric acid-based low pH (acid) microbicide developed for use on food, dairy and beverage processing and filtration equipment.

ACTIVE INGREDIENTS:

Peroxyacetic Acid	6.1%
Hydrogen Peroxide	23.0%
	<u>70.9%</u>
TOTAL	100.0%

Before Using This Product, Please Read This Entire Label Carefully.

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

IF IN EYES:

Contact eyes 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 contraindicate the use of gastric lavage. Have 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 Pesticides Information Center at 1-800-858-7378 6:30 AM to 4:30 PM PST. During other times, call the Poison Control Center at 1-800-222-1222. Both numbers are 7 days/week.

(Directions for Use continued)

For Food/Beverage, Wine and Dairy Processing Equipment, Tanks Vats, Pails, Pipelines and Closed Systems:

Remove gross food particles and soil by a preflush or prescrape, 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 fl. oz. 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 sanitizer solution to achieve pH values in the preferred range of pH 2.5-4 if milkstone or mineralstone inhibition/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 fl. oz. per 6 gallons (v/v) of 200 ppm (11 gram) 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 fl 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 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 water, and add this product to the desired (acid) pH level according to the ranges recommended by the manufacturer. One (1) fl oz of this product per 4-6 gal of feed water should be the minimum dose rate for adequate effectiveness. Circulate for 10 minutes or more and add additional product as necessary to keep the pH below 4, or as recommended 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 air-purge the system and then resume normal operations. If using dilutions stronger than 1 fl oz/ per 4 gal of water, the system needs to be flushed with process water before resuming operations.

Note: This product is highly acidic, so 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 acute product decomposition will occur.

This product degrades with age depending on the storage conditions and temperature. KEEP PRODUCT AWAY FROM HEAT OR DIRECT SUNLIGHT. Use a peroxyacetic acid test kit and increase dosage as necessary to obtain the required level of active ingredients. As a reference, a fresh solution should contain about 90 ppm or more peroxyacetic acid at 1.0 fl. oz per 6 gal of process water.

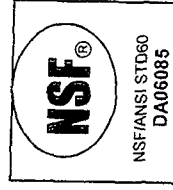
EPA Registration No. 63838-12
EPA Establishment No. 63838-CA-01

ACCEPTED
Enviro Tech Chem. Svcs, Inc. 209-581-9576
500 Winmoore Way, Modesto, CA 95358

JUN 21 2013

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 63838-12

UNSAFE, Oxidizing Liquid, Corrosive, n.o.s., (hydrogen peroxide and nitric acid, stabilized), 5.1 (8), PGII.



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