



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 13, 2026

**SENT BY EMAIL**

Deanna Mansueto  
deanna.mansueto@arxada.com  
ENVIRO TECH CHEMICAL SERVICES, INC.

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 - Add DoT symbol/statement  
Product Name: REFLEX  
Admin Number: 63838-12  
EPA Receipt Date: 05/08/2025  
Action Case Number: 00655810

Dear Deanna Mansueto:

The U.S. Environmental Protection Agency is in receipt of your application for notification under Pesticide Registration Notice 98-10 for the above referenced product. The EPA 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.

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

Should you wish to add/retain a reference to your 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 EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have questions, please contact Steven Snyderman via email at snyderman.steven@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Steven Snyderman". The signature is written in a cursive, flowing script.

Steven Snyderman, Product Manager, Team 33  
RMB 2, AD  
Office of Pesticide Programs

# REFLEX™ (ACID SANITIZER)



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

#### ACTIVE INGREDIENTS:

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

**INERT INGREDIENTS**

**TOTAL** 100.0%

EPA Registration No. 63838-12

EPA Establishment No. 63838-CA-01: 63838-AR-001

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

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

## KEEP OUT OF REACH OF CHILDREN DANGER PELIGRO

#### FIRST AID

IF IN EYES	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
IF SWALLOWED:	<ul style="list-style-type: none"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
IF INHALED	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
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.

#### 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 water below 140° F. Product must be diluted in accordance with label directions prior to use. This product 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 unless 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 this product to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents, and iron or yellow metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, close container with cool water and dilute this product 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:** 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 must be contacted prior to disposal. This product which is to be discarded, must 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.

##### Container Handling: (Containers equal to or less than 5 gallons):

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) 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 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat the procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

#### 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.

#### 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 (providing 95-286 ppm active peroxyacetic acid). 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 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 nonreturnable beverage containers. Allow for adequate draining after the sanitizing rinse. Use this product at 1-3 fl oz per 6 gallons of water (providing 95-286 ppm active peroxyacetic acid).

**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 less, 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 (143 ppm active peroxyacetic acid), 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. This product 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.

#### NOTIFICATION

Manufactured By:  
Enviro Tech Chem. Services, Inc. 209581-9576  
500 Winmoore Way, Modesto, CA 95358

Net Weight:

EPA Submission Date: May 8, 2025

**UN3098, Oxidizing liquid, corrosive, [enter DOT UN # and statement] [enter DOT Symbol] n.o.s, (contains hydrogen peroxide and peroxyacetic acid mixture, stabilized), 5.1 (8), PGII**

63838-12

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:

02/13/2026