

JUN 07 2005

Bob Brennis, Agent for Envirox, LLC.  
c/o Lewis & Harrison  
122 C street, N.W., Suite 740  
Washington, D.C. 20001

**Subject: H<sub>2</sub>ORANGE, 120 Ready to Use  
EPA Reg. No. 69268-3  
Your Amendment Dated 3/16/05**

The amendment referred to above, submitted in connection with registration under section 3 (c) (7) (A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to provide a revised label and technical data sheet for adding the new label use (not a new use for the active ingredient) for sanitizing automobile evaporator coils, is acceptable provided that you comply with the items listed below.

1. Submit/cite all data required for registration and/or reregistration of your product under FIFRA section 3 (c) (5) and section 4 when the Agency requires all registrants of similar products to submit such data.

2. Within 60 calendar days of this letter, submit three copies of a final printed Master Label which make the following corrections:

A. In the "Directions For Use", change the sentence segment in the 2<sup>nd</sup> line, "...kills 99.9% of the following:" to this segment, "...kills 99.9% of the following bacteria in 5 minutes:".

B. In the "Directions For Use", change the sentence segment in the 6<sup>th</sup> line, "...minutes or more at room temperature...", to this, "...minutes at room temperature...". The "or more" must be deleted.

C. In the "Directions For Use", change the sentence segment in the 7<sup>th</sup> line, "...Trichophyton mentagrophytes in 10 minutes" to "Trichophyton mentagrophytes in 5 minutes". The 5 minute contact time is based on data that was approved during the original registration. All bacterial, fungi, and virus claims are now harmonized to 5 minutes. Changing the fungi claim to a 10 minute contact time is not warranted when efficacy was demonstrated at 5 minutes. If you have new data showing the 5 minute contact time for this product does not show the required efficacy, then you must submit 6A2 data.

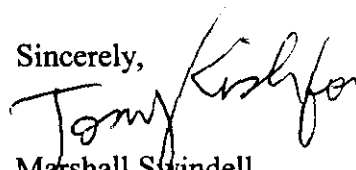
If these conditions are not complied with, the registration will be subject to cancellation in

accordance with FIFRA section 6 (e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the approved revised label is enclosed for your records.

**Please submit a copy of this letter with your response.** If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,



Marshall Swindell,  
Product Manager Team 33,  
Regulatory Management Branch I  
Antimicrobials Division (7510C)

FRONT PANEL - ENVIROX 1%

MASTER LABEL

EPA5/16/05

(logo)

### H<sub>2</sub>ORANGE<sub>2</sub> 120 Ready to Use

CLEANER, DEGREASER & SANITIZER (NON-FOOD CONTACT SURFACES), VIRUCIDE\*, FUNGICIDE & DEODORIZER FOR HARD, NON-POROUS SURFACES, KILLS 99.9% BACTERIA (GERMS)\*\*, REMOVES SOAP SCUM AND MILDEW STAINS, KILLS AND REMOVES MOLD AND MOLD STAINS, SANITIZES AND DEODORIZES SINKS, TUBS AND TILE, SANITIZES AND DEODORIZES COUNTERTOPS, SINKS AND WALLS, FOR USE AS AN AUTOMOBILE EVAPORATOR SANITIZER WITH THE ACCOMPANYING TECHNICAL BULLETIN #1

ACTIVE INGREDIENT	
Hydrogen peroxide	1.00%
OTHER INGREDIENTS	99.00%
TOTAL	100.00%

**KEEP OUT OF REACH OF CHILDREN**

### CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 69268-3

EPA Est. No. 69268-IL-001

**ENVIROX, LLC**  
1938 E. Fairchild St.  
DANVILLE, IL 61832

NET CONTENTS: 1 gallon (3785 ml), 32 oz. (946), or 22 oz. (650)

This product is not to be used as a terminal sterilant/disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts intact mucous membranes, but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to preclean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

**ACCEPTED**  
with **COMMENTS**  
in EPA Letter Dated:

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**PRECAUTIONARY STATEMENTS: HAZARDS TO HUMAN AND DOMESTIC ANIMALS**

**Caution.** Causes moderate eye irritation. Harmful if swallowed, absorbed through skin, or inhaled. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Avoid contamination of food.

**FIRST AID**

**IF IN EYES:** Hold eyelids open and flush with a steady gentle stream of water for 15 minutes. Remove contact lenses, if present, after the first 5 minutes, then, continue rinsing eye. Get medical attention.

**IF ON SKIN:** Rinse skin immediately with plenty of water for 15 to 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.

**IF INHALED:** Remove victim to fresh air. If not breathing, call 911 or an ambulance, then, give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

**STORAGE AND DISPOSAL**

**IN CASE OF SPILL:** Clean up immediately. Place leaking container in well ventilated area. To clean up spill, flush area with large quantity of water. Avoid run-off into storm sewers and ditches leading to natural waterways.

**STORAGE:** Keep out of the reach of children. Do not contaminate water, food, and or feed by storage. Avoid freezing conditions. Avoid high temperatures. Do not exceed storage temperatures of 95°F. Best storage temperatures are between 35°F and 85°F.

**PESTICIDE DISPOSAL:** Do not contaminate water, food or feed by disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Completely empty container. Do not reuse. Please recycle.

**DIRECTIONS FOR USE**

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

**H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use)**, when used as directed as a sanitizer, kills 99.9% of the following: **BACTERIA IN 5 MINUTES:** *Staphylococcus aureus*, (ATCC 6538), *Salmonella choleraesuis*, (ATCC 10708), *Klebsiella pneumoniae* (ATCC 4352), *Pseudomonas aeruginosa* (ATCC 15442), *Streptococcus faecalis* (ATCC 19433), and *Escherichia coli* (ATCC 25922). When used as directed as a virucide, **H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use)** kills the following viruses in 5 minutes ~~at~~ at room temperature (20+/-1°C): \*Influenza A<sub>2</sub>/Japan, and HIV-1 (Human Immunodeficiency Virus). When used as a fungicide, **H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use)** kills *Trichophyton mentagrophytes* in 5 minutes. ~~5~~

**For General Household Cleaning:** Hold 6 to 8 inches from surface, spray soiled surface and scrub or wipe with dry paper towel or lint-free cloth. No rinse is required. For heavy soils and stain removal let sit a few minutes before scrubbing. Removes food grease and stains, fingerprints, soap scum, pencil/crayon marks and general household soils. Use additional solution as needed to complete cleaning. Use on any household surface that is water safe. On delicate fabrics test a small area before cleaning. **Renovation Cleaning:** Spray surface, let sit for 5 to 10 minutes, then, scrub or wipe clean. Rinse released soils with clean water. **To Clean Mold & Mildew Stains:** Apply liberally, let sit five (5) minutes, then, scrub or wipe clean.

**To use as a sanitizer, fungicide and virucide in bathrooms:** Use the **H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use)** for sinks, faucets, counters, urinals (non-water covered surfaces), toilets (non-water covered surfaces) and all hand contact surfaces as well as walls, stalls and floors where urine and soils build up. Follow instructions for inanimate, hard, non-porous surfaces. Allow surface to remain wet for 5 minutes, then, either allow to air dry or wipe dry to remove excess liquid. Heavily soiled surfaces should be pre-cleaned with the same solution.

**To use as a sanitizer, fungicide and virucide on inanimate, hard, non-porous surfaces:** Apply the **H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use)** solution liberally to pre-cleaned hard surfaces, with a spray bottle, pump up pressure sprayer using a coarse spray, cloth, sponge or mop. Allow surface to remain wet for 5 minutes, then, either allow to air dry or wipe dry to remove excess liquid. Heavily soiled surfaces should be pre-cleaned with the same solution.

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**HIV-1:** To kill HIV-1 in 5 minutes at room temperature (20-25°C) on precleaned environmental surfaces/objects previously soiled with blood/body fluids use H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use) solution as is. For use in health care settings or other settings in which there is an expected likelihood of soiling on inanimate surface objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of human immunodeficiency virus Type I (HIV-1 Associated with AIDS).

**SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 (HUMAN IMMUNODEFICIENCY VIRUS OR AIDS VIRUS) OF SURFACES/OBJECTS SOILED WITH BLOOD/BODY FLUIDS:**

**Personal Protection:** Wear appropriate barrier protection such as latex gloves, gowns, masks or eye coverings.

**Cleaning Procedure:** Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use)

**Contact time:** The HIV-1 virus is inactivated in 5 minutes, with both organic load and when diluted in hard water (up to 400 ppm hardness).

**Infectious Materials Disposal:** Cleaning materials that may contain blood and other body fluids should be disposed of by autoclaving or as directed by the facility safety officer.

**Deodorizing:** For general deodorizing, use H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use) as is. Apply liberally to hard, non-porous surfaces to eliminate generally offensive odors. Apply to hard, non-porous surface thoroughly soaking for up to 10 minutes to eliminate odors due to spillage from medical dressings, and other spills such as urine or fecal matter, smoke or soot deposits, industrial plant processes, mildew and mold, to eliminate odors from bathrooms, kitchens, garbage containers, sickrooms and surfaces in musty closets.

**CLEANING SOLUTION DILUTIONS APPLICATIONS**

**H<sub>2</sub>ORANGE<sub>2</sub> 120 (Ready to Use)**

- Streak free window, mirror and stainless steel cleaning
- General floor cleaner for mopping & auto scrubbers
- Bonnet cleaning solution for carpets
- Light wipe down cleaner

- Bathroom, shower room, tile & grout cleaner
- Urine and garbage odor eliminator
- Pre-spray for carpet extraction
  - General degreaser
  - Heavy soil wipe down cleaner
  - Heavy carpet spot remover
  - Cleans Mold & mildew stains

Updated 5/16/2005

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**69268-3**

## Technical Bulletin Containing Application Instructions for Automobile Evaporator Sanitizing

EPA Reg. No. 69268-3

FOR USE ONLY BY TRAINED AUTOMOBILE SERVICE PERSONNEL

### Symptom / Condition

Some vehicle operators may experience a musty odor from the A/C system, primarily at start up in hot and humid conditions. This odor may be the result of microbial growth on the evaporator. During normal A/C operation, condensation forms in and around the A/C evaporator. When airborne pollutants mix with this condensation, mold and mildew growth may begin and odor results

### Diagnosis

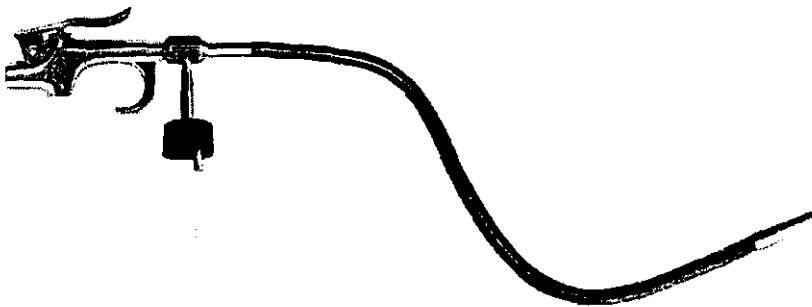
If the operator describes, or the technician experiences a musty odor when operating the A/C system, perform the sanitizing procedure below.

### Materials Needed:

- 1 Bottle, 8 fl. oz./236ml, Evaporator Sanitizer (EPA Reg. No. 69268-3)
- 1 Flexible Applicator Tool Assembly
- 1 Air Line Quick Connect Fitting

### Applicator Tool Kit Assembly:

Attach a compatible airline quick connect fitting to the air gun. Ensure that assembly is not used for other products, or be certain that it is rinsed thoroughly prior to use.



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### General Application Instructions:

This procedure takes about 30 minutes.

1. Inspect the air conditioner drain hose for leaves or other foreign material that may be blocking the drain
2. Place a drain pan beneath vehicle.
3. Cap off the drain tube using a suitable cap

4. Verify that the plenum and evaporator leading edges are free of any debris.
5. Place a protective cover over the carpet below the evaporator.
6. Remove the cabin air filter and cover the opening prior to applying the Evaporator Sanitizer.
7. Using the Ulti-Flex spray tool, apply Evaporator Sanitizer at 85 to 115 PSI and, for best results, within 0 to 2 inches from the surfaces to be cleaned (see application methods below).

8. **APPLICATION METHODS:**

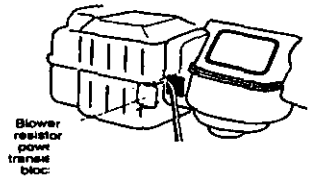
- Remove Blower Motor (picture not available)

Clean any debris from the plenum and evaporator surface then spray the Evaporator Sanitizer directly on the evaporator through the blower motor opening using the flexible wand to direct product over the entire evaporator and surrounding gasket surfaces.

- Remove Blower Resistor/Fin Sensor Access Panel, (fig. 2)

Clean any debris from the plenum and evaporator surface then spray the Evaporator Sanitizer directly on the evaporator through the blower resistor/fin sensor panel opening using the flexible wand to direct product over the entire evaporator and surrounding gasket surfaces.

Fig.2: Blower Resistor



- Drill a 5/8" Hole In The Plenum (fig.3)

Drill a 5/8" diameter hole in the plenum chamber between the blower motor and evaporator being careful to stay clear of the evaporator core and fan with the drill. With the vents closed, insert the tool into the hole and spray the Cooling Coil Sanitizer toward the evaporator. Make sure to move the Ulti-Flex tool back and forth so you spray the entire evaporator surface.

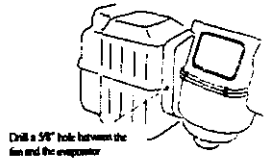


Fig.3: Drill 5/8" Hole

9. Allow the vehicle to sit for a minimum of 5 minutes (do not allow anyone to occupy the vehicle)
10. Remove the cap from the drain tube
11. Rinse the evaporator with 8 ounces of potable water
12. Reassemble any unassembled components. If a hole was drilled for application, use a manufacturer approved RTV sealant to plug the hole. Remove protective plastic coverings from inside the vehicle and remove the drip tray from the workshop floor.
13. Start the engine
14. Open driver's window 1/2"
15. Set the blower to high
16. Set the a/c switch to a/c off
17. Set mode switch to panel outlets
18. Set temperature switch to full heat
19. Set recirculation switch to recirculate
20. Do not allow anyone to occupy the vehicle during this operation.
21. Allow the blower to operate for at least 5 minutes (this will dry the evaporator)
22. Note the Evaporator Sanitizer application date in service record sheet.

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