07-15-2011

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

72977-5

SEPA United States Environmental Protection Office of Pesticide Programs

ETI H2O, INC. 725 Gillespie Way El Cajon, CA 92020

JUL 1 5 2011

AGENT: Steptoe and Johnson, LLP 330 Connecticut Avenue, N.W. Washington, D. C. 20036-1795

Attention: Juli Mann

Subject: SDC3A EPA Registration No. 72977-5 Amendment Dated March 1, 2011

The amendment, submitted in connection with registration under section 3©(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, to add use new claims against various bacteria, viruses and fungi, is acceptable, provided that you:

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

2. On page 2 of the proposed label, change "Fiberglass" to read "Sealed fiberglass". Fiberglass is a porous surface.

3. As stated in past reviews, contact time and kill time are synonymous. To present kill time that is different than the contact time is misleading to the end-user.

4. Refer to the enclosed copy of the review under "CONCLUSIONS" and "LABEL" for further comments.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Page 2 EPA Registration No. 72977-5

A stamped copy of the "accepted" product labeling is enclosed for your records. Submit two (2) copies of final printed labeling before you release the product for shipment.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,

Marshall Swindell

Product Manager 33 Regulatory Management Branch 1 Antimicrobials Division (7510P)

Enclosure

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SDC3A

[Disinfectant], [Fungicide] [& Virucide*][& Food Contact Surface Sanitizer]

[Disinfects and Deodorizes] • [Food Contact Surface Sanitizer] • [Sanitizer for Food Contact Surfaces] • [Restaurants] • [Hospitals] • [Schools] • [Homes] • [Offices] • [Trucks] • [Trailers] • [Shipping Containers] • [Rail Cars] • [Sanitizer for food [and beverage] processing equipment [facilities]]

Active	Ingred	ient

Silver	0.003%
Citric Acid	4.846%
Other Ingredients	95.151%
Total	100.000%

⁺ Electrolytically generated silver ions stabilized in citric acid as silver dihydrogen citrate

KEEP OUT OF REACH OF CHILDREN

0.003%

Manufactured by ETI H2O A Division of PURE Bioscience 1725 Gillespie Way El Cajon, CA 92020 EPA REG. No. 72977-5 EPA EST. No. 72977-CA-001 Net Vol. [Batch Number - may appear on container]

ACCEPTED with COMMENTS EPA Letter Dated:

JUL 1 5 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as registered under EPA Reg. No. 72977-5 amended for the pesticide,

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NOTE: [Bracketed] text is optional wording. Bold/italicized test is information only and not part of the label. Page 1 of 11

ESL 03/15/2010, Notification 04/29/2010

DIRECTIONS FOR USE

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

[SDC3A] [this product] is a colorless, odorless, broad spectrum antimicrobial [sanitizer], disinfectant and deodorizer. Proven to kill bacteria, fungus and viruses*, [SDC3A] [this product] should be used on non-porous environmental hard surfaces in *Choose from the lists below*

Note:Non food contact sites

Homes [households] offices hospitals nursing homes medical clinics dental clinics infirmary blood bank[s] pharmacies laboratories funeral homes veterinary clinics animal shelters kennels cages stables catteries animal transport vehicles

Note:Food Contact sites

beverage plants food processing plants [facilities] food storage areas food [beverage] prep areas institutional kitchens cafeterias bars fast food operations coffee [donut] [bage]]shops ambulances patient transfer vehicles hotels restaurants bars supermarket[grocery store] schools colleges dorm rooms [dormitories] churches shelters military [installations] [locations] day care facilities daycare centers nurseries playrooms playgrounds

delis liquor [convenience] stores eating establishments supermarkets [grocery stores] snack bars dinning rooms lunchrooms break rooms dairy farms [facilities] recreational facilities prisons [jails] kitchens public] restrooms bathrooms washrooms` laundry rooms bedrooms basements garage(s) workshops attics locker rooms exercise facilities gyms [gymnasium] beauty shops (salons) barber shops spas

egg processing plants meat [poultry] [fish]processing plants meat [poultry] [fish]producing establishments rendering plants [milk] [fruit] [vegetable] [wine] [ice cream] [potato] processing facilities health clubs laundromats airports school buses cars [autos] RV [mobile home] trucks trailers shipping containers rail cars subways trains airplanes ships cruise ships busses other public transportation vehicles

[Food service] [hospitality] Cruise ship food processing [preparation] areas Dining halls smokehouses

[SDC3A] [this product] has been formulated to treat hard, non-porous environmental surfaces ([painted], [glazed tile], [plastic], [non-porous vinyl], [naugahyde], [polyurethane], [plasticized PVC], [butyl rubber (EPDM)], [neoprene], [Viton®, [Teflon®], [silicone] [metal], [glass], [glazed porcelain], [acrylic], [fiberglass], [sealed granite], [sealed marble], [Formica®], [linoleum]) and objects including Choose from the lists below

NOTE: Non-food contact surfaces

NOTE. NONTOOD COnduct Surface	5		
walls	appliances	pacifiers	potty[training] seats
floors	stove tops	toy boxes	laundry hampers _c
counters	bed frames	play tables	bathroom counters
cabinets [cabinet handles]	wheelchairs	jungle gyms	kitchen counters
sinks	over-bed tables	playhouses	grocery carts င ်
tubs	examination tables	baby furniture	desks cccc
exterior toilet [urinal]	waste containers	child car seats, hard surfaces	ິ່ງ ເປັນເປັນເປັນເປັນເປັນເປັນເປັນເປັນເປັນເປັນ
surfaces	tables	only	tanning beds
faucet handles	chairs	ACCEPPEB chairs [seats]	e e geat ditter boxes e e
showers	patio furniture	with COM Strollers [stroller handles]	ັດແຫລl cages.[carders]
doorknobs	equipment tables	WILL COMPLETATS	င်ငင်းpet bowls [ˈˈlishes] ်
handrails	lab benches	EPA LetteraDated:	ွှင့် anifnal feeding dishes
light switch covers	[AC] [heating] vents	activity centers	non-porous athletic mats
telephones	children's toys	UL 1 5 diaper pails	
remote controls	toys	20 diaper changing tables	l.
	Under	the Federal Insecticide,	
	Funcic	nic redetal disecticide,	ί.
	amend	nde, and Rodenticide Act as	-
	aneno Xomista	led. for the pesticide,	-
	registe	ered under EPA Reg. No. 72977-5	

NOTE: [Bracketed] text is optional wording. Bold/italicized test is information only and not part of the label. Page 2 of 11

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NOTE: Food Contact Surfaces

counters [countertops] dish racks drainboards highchairs [trays] breast pump [parts] lunch boxes[pails] picnic tables drinking fountains kitchen surfaces food processing equipment bottling equipment pre-mixing equipment blenders [food] processors beverage bars [equipment] buffet counters salad bars snack counters cutting boards plastic and other nonporous chopping blocks coolers ice[machines] chests ice cream machines [equipment] vogurt machines [equipment]refrigerator bins used for meat, vegetables, fruit and eggs [refrigerated] food display equipment

food cases dairy cases food contact surfaces food trays stovetops blenders meat cutting machines bread slicing machines mixing equipment [mixers] kitchen appliances [meat], [fish], [poultry] washers blanchers dicers slicers grinders shredders stuffers scalders pickers shackles saws trolleys hooks tables hoists sorters scales cones deboners

separators

carts racks chiller tanks conveyor systems labeling machines packaging equipment canning equipment descalers skinning equipment filleting machines homogenizers evaporators dryers clarifiers storage tanks cheese making equipment processing vessels pumps pasteurizers filling line equipment Tanks Kettles filling, seaming, sealing and capping equipment pulpers juicers millers grinders ovens extractors blanchers

refrigerators freezers microwaves toasters cooking equipment ovens ranges grills fryers choppers crispers cutters shelving bins cabinets sinks basins faucets bakery equipment coffee and tea equipment steam tables warming equipment concession equipment [processing] vacuums [processing] hand [power] tools

ACCEPTED with COMMENTS F EPA Letter Dated:

JUL 1 5 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended. for the pesticide, registered under EPA Reg. No. 72977-5

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NOTE: [Bracketed] text is optional wording. Bold/italicized test is information only and not part of the label. Page 3 of 11

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ESL 03/15/2010, Notification Will COMMENTS

• EPA Letter Dated:

General Information C3A] [this product] successfully killed the following organisms under AOAC protocols (In a	$JUL = 1.5 \frac{2011}{2011}$
	Under the Federal Insecticide
Organism	Fungicide, Kill Timeenticide Act as
‡Pseudomonas aeruginosa	ainendeco fes the pesticide.
‡ Salmonella enterica	regist steenhilder EPA Reg. No. 72
\$ Staphylococcus aureus	2 minutes
‡Listeria monocytogenes	2 minutes
Vancomycin resistant Enterococcus faecium (VRE)	2 minutes
Methicillin resistant Staphylococcus aureus (MRSA)	2 minutes
Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA)	2 minutes
Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA-PVL)	2 minutes
Escherichia coli O157:H7	2 minutes
Acinetobacter baumannii	2 minutes
Campylobacter jejuni	2 minutes
Carbapenem resistant Escherichia coli	2 minutes
Carbapenem, resistant Klebsiella pneumoniae	2 minutes
Carbapenem resistant Klebsiella pneumoniae, NDM-1+	2 minutes
Trichophyton mentagrophytes (Athlete's Foot Fungus)	5 minutes
[‡]*HIV type 1[Strain HTLV IIIB]	30 seconds
[‡]*Rotavirus	30 seconds
[‡]*Human Coronavirus	30 seconds
[‡]*Influenza A (H1N1)	30-seconds
[‡]*Swine Influenza A (H1N1)	30 seconds
[‡]*Respiratory Syncytial Virus [RSV]	30 seconds
[‡]*Adenovirus Type 2	30 seconds
[‡]*Avian Influenza A	30 seconds
[‡]*Influenza A [VR-544, Hong Kong strain]	30 seconds
Hepatitis B Virus (HBV) [as Duck Hepatitis B Virus]	1 minute [60 seconds]
Hepatitis C. Virus (HCV) [as Bovine Diarrhea Virus]	1 minute [60 seconds]
*Murine Norovirus [MNV-1]	1 minute [60 seconds]
* Norovirus [as Feline Calicivirus]	1 minute [60 seconds]
*Herpes Simplex Type 1 [VR-733 F(1) Strain]	1 minute [60 seconds]
*Rhinovirus [R37 VR-1147, Strain 151-1]	1 minute [60 seconds]
*Polio Type 2 [VR-1002, Lansing Strain]	1 minute [60 seconds]

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SDC3A label amend 201100301.doc

[Fungicidal Activity: [SDC3A] [this product] is effective against *Trichophyton mentagrophytes*, the Athlete's foot fungus. Use in locker rooms, dressing rooms, shower and bath areas, and exercise facilities.]

[Deodorizes: When used as directed, [SDC3A] [this product] reduces annoying odors caused by bacteria. Use to control odors in hospitals, nursing homes, public restrooms, animal kennels and barn stalls. In private homes, use in the kitchen, bathroom, sink rooms and basements.]

[**SANITIZATION: SDC3A is a foo	d contact surface sanitizer proven to kill 99.999%	6 of the following bacteria in	60 seconds:
Escherichia coli S	taphylococcus aureus	cuteu	
See application instructions for prop	er use.]		ιι ι ι ε ι
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		ειιι	ς
	APPLICATION INSTRUCTION	S	ι ι
Pre-clean surfaces prior to using this p	product. [You may use this product for pre-cleani	ing.]	ι ι ί ι ι ι ι
[General Cleaning: Apply to surface u	intil thoroughly wet then wipe the surface clean.]		ί ι ίιίιι ί

General Disinfection:

For general disinfection and control of the bacteria *Pseudomonas aeruginosa, Staphylococcus aureus, Salmonella enterica, Listeria monocytogenes,* Vancomycin Resistant *Enterococcus faecium* (VRE), Methicillin Resistant *Staphylococcus aureus* (MRSA), Community

NOTE: [Bracketed] text is optional wording. Bold/italicized test is information only and not part of the label. Page 4 of 11

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Associated Methicillin resistant Staphylococcus aureus (CA-MRSA), Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA-PVL), Escherichia coli O157:H7, Acinetobacter baumannii, Campylobacter jejuni, Carbapenem: resistant Escherichia coli, Carbapenem resistant Klebsiella pneumonia, and Carbapenem resistant Klebsiella pneumoniae (NDM-1 [positive] [+1]) the surface must be completely wet with [SDC3A] [this product] for 2 minutes. The surface may then be wiped dry with a clean towel. When used as directed, [SDC3A] [this product] provides residual protection from Pseudomonas aeruginosa, Staphylococcus aureus and Salmonella enterica up to 24 hours after initial application. Do not [touch] [contact] treated surface after application if residual protection is to be maintained.

NOTE: The following condensed instructions may be used in place of the above paragraph. ACCEPTED To kill bacteria, [apply] [spray] [mist] [SDC 3A] [this product] to the surface until thoroughly wet for **Writhues**. The surface may then be wiped dry with a clean towel. When used as directed, [SDC3A] [this product] provides residual projection from Repromonas aeruginosa, Staphylococcus aureus and Salmonella enterica up to 24 hours after initial application. Do not touch in the surface in the surface initial application. surface after application if residual protection is to be maintained.

Fungus Control: For effective control of the fungus Trichophyton mentagrophytes, the surface must be completely we will effect and this product for 5 minutes. The surface may then be wiped dry with a clean towel. Re-apply when cleaning on when new approxition of the pesticide, registered under FPA Percent of the pesticide, The surface may then be wiped by a clean towel. Re-apply when cleaning on the pesticide of the pesticide, the surface may then be wiped by a clean towel. Re-apply when cleaning on the pesticide of the pe

NOTE: The following condensed instructions may be used in place of the above paragraph. To kill fungus, [apply] [spray] [mist] [SDC3A] [this product] to the surface until thoroughly wet for 5 minutes. The surface way then be 78977-5 wiped dry with a clean towel. Re-apply when cleaning or when new growth appears.

*Viral Control:

To kill Herpes Simplex Type 1 [F(1) Strain], Rotavirus, Human Coronavirus, Influenza A (H1N1), Swine Influenza A (H1N1), Adenovirus Type 2, Respiratory Syncytial Virus [RSV], Murine Norovirus [MNV-1], Norovirus [as Feline Calicivirus], Avian Influenza A, Influenza A Virus [Hong Kong strain], Rhinovirus [R37 Strain 151-1] and Polio Virus Type 2 [Lansing Strain] the surface must be completely wet with [SDC3A] [this product] for 1 minute. The surface may then be wiped dry with a clean towel.

NOTE: The following condensed instructions may be used in place of the above paragraph.

To kill viruses, [apply] [spray] [mist] [SDC3A] [this product] to the surface until thoroughly wet for 1 minute. The surface may then be wiped dry with a clean towel.

Note to Reviewer: The following are optional phrases as outlined in the EPA's Guidance for Testing and Labeling Claims against Pandemic 2009 H1N1 Influenza A Virus (Formerly called Swine Flu)

[Respiratory illnesses attributable to Pandemic 2009 H1N1are caused by influenza A virus. [SDC3A] [This product] is a broad-spectrum hard surface disinfectant that has been shown to be effective against [Influenza A Virus (H1N1)], [Influenza A Virus], [Avian Influenza A Virus] and [Swine Influenza A Virus (H1N1)] and is expected to inactivate all Influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).]

[SDC3A] [[This product] has demonstrated effectiveness against Influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.]

Kills HIV-1, HBV and HCV on pre-cleaned environmental surfaces/objects previously soiled with blood/body fluids in health care settings (or other settings in which there is an expected likelihood of soiling of inanimate surfaces/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 HIV HBV or HCV): Instructions for Cleaning and Decontamination Against HIV, HBV and HCV on pre-cleaned environmental surfaces/objects previously soiled with blood/body fluids: Personal Protection: When handling items sciled with blood or body fluids, use appropriate barrier protection such as latex gloves, gowns, masks and eye coverings. Cleaning Procedure: Blood ລ້າຜີ other body fluids must be thoroughly cleaned from surfaces and objects before application of this disinfectant. Contact Time: Apply SDC3AI [this product) to area to be treated. Allow the surface to remain wet for 30 seconds to kill HIV-1. Use 1 minute for HBV and HCV. The surface may then be wiped dry with a clean towel. These contact times will not control all organisms listed on this label. Refer to application instructions for other organisms. Disposal of Infectious Materials: Blood and other body fluids should be autoclaved and disposed of according to federal, state and local regulations for infectious waste disposal.

Sanitization [of food contact surfaces]

Do not use this product on utensils, dishes or glassware.

NOTE TO REVIEWER: Products labeled only for consumer/residential/ commercial use will include the following directions for use:

[To] Sanitize Food Contact Surfaces

NOTE: [Bracketed] text is optional wording. Bold/italicized test is information only and not part of the label. Page 5 of 11

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Spray, pour or spread [SDC3A] [this product] on surface until thoroughly wet. Let stand for 60 seconds [one minute] and wipe with a clean towel or allow to air dry. No rinsing is required.

** [SDC3A] [This product] kills 99.999% of Escherichia coli [E. coli] and Staphylococcus aureus.

NOTE TO REVIEWER: Products labeled for commercial/industrial/food processing area use will include the following directions for use:

To sanitize food contact surfaces

or

To sanitize food processing equipment and other hard surfaces in food processing locations, dairies, restaurants and bars:

[Recommended] for sanitizing food processing equipment, dairy equipment, sink tops, countertops, refrigerated storage and display equipment, and other hard nonporous surfaces. Recommended for use in restaurants, dairies, food processing plants [establishments] [facilities] and bars.

[Clean, Rinse Sanitize] Prior to application, remove gross food particles and soil by pre-flush or pre-scrape and when necessary, pre-space. Thoroughly wash objects to be sanitized with a good detergent or cleaner followed by a potable water rinse prior to applying sanitized RBE bable was Directly to be sanitized with a good detergent or cleaner followed by a potable water rinse prior to applying sanitized RBE bable was REPARED FOR THE SAN TH No Romable water

EPA Letter Dated: Apply [SDC3A] [this product] by spraying or by total immersion. Surfaces must remain wet for 60 seconds [1 minute].

Appropriate fashion prior to sanitizing. 2011 If the [article] [surface] cannot be washed and rinsed, clean thoroughly in an appropriate fashion prior to sanitizing. 2011 **[SDC3A] [This product] is a ready to use sanitizer that eliminates 99.999% of the following backhaim 60 seconds in secticide, staphylococcus aureus Staphylococcus aureus Constraints for the pesticide amended, for the pesticide, registered under EPA Reg. No. 72977-5

-OR-

Prior to use in a federally inspected meat and poultry plants and dairies, food products and packaging materials must be removed from the room or carefully protected. A potable water rinse is not permitted following the use of this product as a sanitizer on previously cleaned hard, non-porous surfaces, provided that the surfaces are adequately drained before contact with food so that little or no residue remains.

Apply [SDC3A] [product] to pre-cleaned hard surfaces by thoroughly wetting surfaces with a cloth, mop, sponge, sprayer or by immersion. Surfaces should remain wet for 1 minute followed by adequate draining and air drying.

**[SDC3A] [This product] is a ready to use sanitizer that eliminates 99.999% of the following bacteria in 60 seconds: Escherichia coli (ATCC 11229) Staphylococcus aureus

[DIRECTIONS FOR SANITIZING FOOD PROCESSING EQUIPMENT AND FOOD CONTACT ARTICLES REGULATED BY 21 CFR Sec. 178.1010b(22), c(17):

- Scrape flush or presoak articles to remove gross food particles and soil. 1.
- 2. Thoroughly wash articles in an appropriate detergent or cleaner.
- 3. Rinse articles thoroughly with potable water.

Sanitize articles by immersion in [SDC3A] [this product] for 60 seconds. Articles too large for immersion should be thoroughly 4. wetted with [SDC3A] [this product] by rinsing, spraying or swabbing.

Remove immersed items from solution to drain and air dry. Non-immersed items should also be allowed to air dry. 5. [U.S. PUBLIC HEALTH SERVICE FOOD SERVICE SANITIZATION RECOMMENDATIONS CLEANING AND SANITIZING:

Equipment shall be thoroughly pre-flushed or pre-scraped and pre-soaked when necessary to remove gross food particles and soil.

Thoroughly wash equipment in a hot detergent solution. Rinse equipment thoroughly with potable water. 1.

2. Sanitize equipment by immersion for 60 seconds at a temperature of 75°.

3. For equipment that is too large to immerse, apply [SDC3A] [this product] by rinsing, spraying or swabbing until thoroughly wetted. cc

Allow sanitized surfaces to drain and air dry. No potable water rinse is allowed.] 4

IBEVERAGE DISPENSING EQUIPMENT SANITIZER DIRECTIONS

For sanitizing of bottling or pre-mixed dispensing equipment after cleaning thoroughly rinse equipment with a potable water rinse. Fill equipment with [SDC3A] [this product] and allow to remain in the equipment for at least 60 seconds. Sanitizing solution should be drained from the system. To insure the removal of flavors, it is suggested that during changeover between products the system should be cleaned, rinsed and flushed with the sanitizing solution for at least 1 minute. Drain thoroughly and allow to air dry before reuse. No potable water rinse is allowed.]

NOTE: [Bracketed] text is optional wording. Bold/italicized test is information only and not part of the label. Page 6 of 11

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[FOR SANITIZING IN FISHERIES, MILK, WINE, CITRUS, POTATO & ICE CREAM PROCESSING PLANTS: For use as a sanitizer on conveyor belts and equipment [to reduce or eliminate odors in the processing area]. Also for use on filling equipment to reduce bacteria. Follow directions for sanitizing food contact surfaces.]

IWISCONSIN STATE DIVISION OF HEALTH DIRECTIONS FOR EATING ESTABLISHMENTS

- Scrape and pre-wash articles whenever possible. 1.
- Wash with a good detergent or compatible cleaner. 2.
- Rinse with potable water 3.
- Sanitize in [SDC3A] [this product] without diluting. Immerse all articles for at least one minute or for contact time 4. specified by governing sanitary code.
- Place sanitized articles on a rack or drain board to air dry. 5

NOTE: A clean potable water rinse following sanitization is not permitted under Section HFS 196.13 of the Wisconsin Administrative Code.]

NOTE: Optional refill instructions

To refill [spray bottles]:

- 1. [REMOVE] Remove trigger sprayer [or cap] from empty bottle
- [POUR] Remove cap from refill and pour contents directly into empty [bottle]. 2.
- [USE] Replace trigger sprayer and use as you normally would. 3.

NOTE: The following language will be printed on the label of products intended to be sold to health facilities:

This product is not to be used as a terminal sterilant/high level 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 pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

NOTE: The following may only be used on the back or side panel of the label if a supplemental registrant obtains an NSF listing:



-OR-

[NSF Listed] [Include NSF Listing Number]

with COMMENTS * EPA Letter Dated: JUL 1 5 2011 Under the Federal Insecticide,

ACCEPTED

Fungicide, and Rodenticide Act as amended. for the pesticide, 72917-5 registered under EPA Reg. No.

This statement will be used on NONREFILLABLE CONTAINERS.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry area away from direct sunlight at temperatures above freezing. **Pesticide Disposal:** Nonrefillable Container. Do not reuse or refill this container –or- [Refill only with this product. Do not reuse or refill except as described in the directions for use.]. If empty: Place in trash or offer for recycling if available. Rinse thoroughly before discarding in trash or recycling.

This statement will be used on REFILLABLE CONTAINERS (typically 55 gallons or larger).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **Pesticide Storage:** Store in a cool, dry area away from direct sunlight at temperatures above freezing. Store in original container.

Pesticide Disposal: To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a 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 to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Container Handling: Refillable Container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into a mix tank or storage tank. Fill the container about 1/4 full with solvent used in the end use product. Replace and tighten closures. Agitate vigorously or recirculate water with a pump for 2 minutes. Pour or pump rinsate into mix tank or rinsate collection system for later use or disposal. Repeat this rinsing procedure two more times

IN CASE OF EMERGENCY

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact [CHEMTREC 1-800-424-9300] or [the National Pesticide Information Center at 1-800-858-7378, Monday through Friday, 9 a.m. to 5 p.m] for emergency medical treatment information.

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JUL 1 5 2011 Under the Poden 22	ιι(ι) ι ι ι ι ι ι ι ι	
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ESL 03/15/2010 , Notification 04/29/2010 SDC3A label amend 201100301.doc

Optional marketing phrases

[Kills] [Eliminates] [Effective against] [Defends against] Choose one or more from the list below:

Salmonella enterica [in 30 seconds^{*}]

Pseudomonas aeruginosa [in 30 seconds[‡]]

Staphylococcus aureus

Listeria monocytogenes Acinetobacter baumannii [in 2 minutes]

Campylobacter jejuni [in 2 minutes]

MRSA or [Methicillin Resistant Staph] or [Methicillin Resistant Staphylococcus aureus]

CA-MRSA or [Community Associated MRSA] or [Community Associated Methicillin Resistant Staphylococcus aureus] CA-MRSA-PVL

VRE or [Vanocomycin-resistant Enterococcus] or [Vancomycin resistant Enterococcus faecium] Escherichia coli O157:H7 [E. coli]

Carbapenem resistant Escherichia coli: [in 2 minutes]

Carbapenem resistant Klebsiella pneumoniae [in 2 minutes]

Carbapenem resistant Klebsiella pneumoniae [(NDM-1 [+] [positive])] [in 2 minutes] Tricophyton mentagrophytes

HIV [in 30 seconds[‡]]

Herpes Simplex Virus [in 1 minute]

Influenza A Virus [in-30 seconds*]

Rhinovirus [in 1 minute]

Polio Virus Type 1 [in 1 minute] Rotavirus [in 30 seconds[‡]]

Human Coronavirus [in 30 seconds[†]]

Norovirus [as Feline Calicivirus] [in 1 minute]

Avian Influenza A on pre-cleaned environmental hard surfaces [in 30 seconds]

Respiratory Syncytial Virus [RSV] [in 30 seconds[‡]] Adenovirus [type 2] [in 30 seconds⁺]

Influenza A (H1N1) [in 30 seconds⁺]

Swine Influenza A (H1N1) [in 30 seconds[‡]]

Murine Norovirus [in 1 minute]

Hepatitis B Virus [HBV] [in 1 minute]

Hepatitis C Virus [HCV] [in 1 minute]

Kills germs in 30 seconds⁴

Kills common household germs

Kills germs [on surfaces you touch most]

Kills common household germs including [Salmonella enteric], [Staphylococcus aureus], [Listeria monocytogenes], and [E. coli]. Kills [Salmonella], [Staphylococcus], [Listeria], and [E. coli].

ACCEPTED

with COMMENTS

..... 1 5 2011

Under the Federal Insecticide,

amended for the pesticide,

registered under EPA Reg. No.

Fungicide, and Rodenticide Act as

72977-0

* EPA Letter Dated:

Kills - Bacteria, Fungus and Virus* Disinfects [Defends against] common household surfaces

Kills [Defends against] [common] [cold] and [flu] virus[s]

Defends against germs that can make you sick

Disinfectant, Fungicidal & Virucidal* Spray

Can help reduce the risk [danger] of cross contamination [Effective against] [Kills] multiple drug resistant bacterium

Fast acting disinfectant

Designed for practical use [Patented] Silver [Ion] Formula

No dulling residue

Disinfects without bleaching No harsh chemical smell

Odorless

Contains no [dyes] or [artificial fragrances] Colorless

Ready-to-Use [Formula]

No mixing required

Eliminates odors caused by bacteria

Disinfects household surfaces

No Mixing Required Powered by [Axenohl®] [SDC 2400] [Axenohl Alternate brand name]

For daily use

Refill

NOTE: [Bracketed] text is optional wording. Bold/italicized test is information only and not part of the label. Page 9 of 11

SDC3A label amend 201100301.doc

ccccc

[Worldwide] Patented formula [U.S. Patent(s) 6,197,814 ; 6,583,176, 7,261,905, [additional patent numbers as issued] Other patents pending Use for a [fresh] [home] [environment] [kitchen] Commercial [Line] [Disinfectant] Industrial [Line] [Disinfectant] ACCEPTED Hospital [Line] [Disinfectant] with COMMENTS EPA Letter Dated: Consumer [Line] [Disinfectant] Retail [Line] [Disinfectant] Freight [Line] [Disinfectant] Janitorial [Line] JUL 1 5 2011 Janitorial Disinfectant Under the Federal Insecticide, **Cruise Line Disinfectant** Fungicide, and Rodenticide Act as [FAST], [EASY], [EFFECTIVE] [Antimicrobial] [antibacterial] disinfectant amended for the pesticide, Leaves surfaces disinfected registerea unae: EPA Reg. No. 72 977-5 For use on high touch surfaces Travel size For use in (insert use site from label) For use on (insert use surface from label) [Ideal for] [Formulated for] [Hospitality Environment(s)] [Institutional] [Childcare Environment(s)] [Medical Environment(s)] [Nursing Environment(s)] [Healthcare Environment(s)] [Athletic Environment(s)] [Educational Environment(s)] A New Generation of Protection A New Generation Disinfectant As seen on TV may include graphic



Made in the USA [may include graphic of American flag]

[SDC3A] [This product] has demonstrated effectiveness against Influenza A Virus [Avian Influenza A Virus] [Swine Influenza A Virus] and is expected to inactivate all Influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu). Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu). Kills Pandemic 2009 H1N1 influenza A virus.

The following phrases can also be used for products labeled as a food contact sanitizer

No Rinsing required No Rinse Formula No Rinse sanitizer Sanitize without rinsing For daily [use] [sanitization] Sanitizes kitchen surfaces Household sanitizer Institutional sanitizer Kills 99.999% of bacteria [in 60 seconds]** Kills 99.999% of Escherichia coli (E. coli) [in 60 seconds]** Kills 99.999% of Staphylococcus aureus [in 60 seconds]** Kills 99.999% of bacteria that cause food borne illnesses [food poisoning] Effective sanitizer for food contact surfaces For use in [insert one or more of the use sites listed on the label] For use on [insert one or more of the use surfaces listed on the label] For sanitizing [insert one or more of the food contact use surfaces] No [measuring] [mixing] required Effective sanitizer for food [and beverage] processing equipment [facilities]

KEY:

*-Refer to viruses

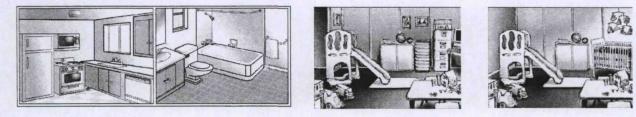
‡-Refer to organisms controlled with 30 second kill time

** Refers to sanitizer claims

NOTE: [Bracketed] text is optional wording. Bold/italicized test is information only and not part of the label. Page 10 of 11

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These or similar optional graphics may be used to demonstrate use sites (graphics are larger here than they will appear on the label)



THE FOLLOWING TABLE IS OPTIONAL TEXT:

Organism	ID
Pseudomonas aeruginosa	ATCC#15442
Staphylococcus aureus ¹	ATCC#6538
Salmonella enterica ¹	ATCC#10708
Listeria monocytogenes ¹	ATCC#19111
Vancomycin resistant Enterococcus faecium (VRE)	ATCC#700221
Methicillin resistant Staphylococcus aureus (MRSA)	ATCC#700698
Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA)	NRS123, USA 400
Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA-PVL)	NRS 192
Escherichia coli O157:H7	ATCC#43888
Acinetobacter baumannii	ATCC#19606
Campylobacter jejuni	ATCC#29428
Carbapenem resistant Escherichia coli	BSLI#082710-EcCP1
Carbapenem resistant Klebsiella pneumoniae	BSLI#081710KPC4
Carbapenem resistant Klebsiella pneumoniae , NDM-1 +	ATCC#BAA-2146
Trichophyton mentagrophytes (Athlete's Foot Fungus)	ATCC#9533
*HIV type 1- Strain HTLV IIIB	HTLV-IIIB
*Herpes Simplex Type 1 VR-733 F(1) Strain	ATCC VR-733
*Rotavirus	Strain WA, Ottawa
*Human Coronavirus	ATCC VR-740
*Influenza A (H1N1)	ATCC VR-1469
*Swine Influenza A (H1N1)	ATCC VR-333
*Respiratory Syncytial Virus [RSV]	ATCC VR-26
*Adenovirus Type 2	ATCC VR-846 cccc
*Murine Norovirus	MNV-1.CW1
*Norovirus [as Feline Calicivirus]	ATCC VR-782
*Avian Influenza A	ATCC. VR-2072
*Influenza A [VR-544, Hong Kong strain]	A1CC VF-544
*Rhinovirus [R37 VR-1147, Strain 151-1]	ATCC VR-1147 cccc
*Polio Type 2, [VR-1002, Lansing Strain]	ATCC V/R-1002
Hepatitis B Virus (HBV) [as Duck Hepatitis B Virus] with COMMENTS	Hepednavirus Testing Inc., Lot 7/31/07 pool
Hepatitis C Virus (HCV) [as Bovine Diarrhea Virus] * EPA Letter Dated:	Strain Oregon (241- genotype 1

JUL 1 5 2011 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amendea. for the pesticide, registered under EPA Reg. No. 72977-5

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