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

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 July 20, 2011

The amendment, submitted in connection with registration under section 3(c)(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(c)(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.
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,

[Signature]

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

Enclosure
SDC3A
[Disinfectant], [Fungicide] [Virucide*] [Food Contact Surface Sanitizer]


Active Ingredient
Silver¹ 0.003%
Citric Acid 4.846%
Other Ingredients 95.151%
Total 100.000%

¹ Electrolytically generated silver ions stabilized in citric acid as silver dihydrogen citrate

KEEP OUT OF REACH OF CHILDREN

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]
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] [bagel] [shops]

**Note:** Non-food contact surfaces

- walls
- floors
- counters
- cabinets [cabinet handles]
- sinks
- tubs
- exterior toilet [urinal]
- surfaces
- faucet handles
- showers
- doorknobs
- handrails
- light switch covers
- telephones
- remote controls

- appliances
- stove tops
- bed frames
- wheelchairs
- over-bed tables
- examination tables
- waste containers
- tables
- chairs
- patio furniture
- equipment tables
- lab benches
- [AC] heating vents
- children's toys
- toys

- recreational facilities
- prisons [jails]
- kitchens
- [public] restrooms
- bathrooms
- washrooms
- laundry rooms
- bedrooms
- basements
- garages
- workshops
- attics
- locker rooms
- exercise facilities
- gyms [gymnasium]
- beauty shops [salons]
- barber shops
- spas
- health clubs
- laundromats
- airports
- school buses
- cars [autos]
- RV [mobile home]
- trucks
- trailers
- shipping containers
- rail cars
- subways
- trains
- airplanes
- ships
- cruise ships
- buses
- other public transportation vehicles
- [food service] [hospitality]
- Cruise ship food processing
- [preparation] areas
- Dining halls
- smokehouses

**NOTE:** Non-food contact surfaces

- delis
- liquor [convenience] stores
- eating establishments
- supermarkets [grocery]
- stores
- snack bars
- dinning rooms
- lunchrooms
- break rooms
- dairy farms [facilities]
- egg processing plants
- meat [poultry]
- [fish] processing plants
- meat [poultry]
- [fish] producing establishments
- rendering plants
- [milk] [fruit] [vegetable]
- [wine] [ice cream] [potato]
- processing facilities

**NOTE:** Non food contact sites

- 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

- patient transfer vehicles
- 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

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- waste containers
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- lab benches
- [AC] heating vents
- children's toys
- toys

- recreational facilities
- prisons [jails]
- kitchens
- [public] restrooms
- bathrooms
- washrooms
- laundry rooms
- bedrooms
- basements
- garages
- workshops
- attics
- locker rooms
- exercise facilities
- gyms [gymnasium]
- beauty shops [salons]
- barber shops
- spas
- health clubs
- laundromats
- airports
- school buses
- cars [autos]
- RV [mobile home]
- trucks
- trailers
- shipping containers
- rail cars
- subways
- trains
- airplanes
- ships
- cruise ships
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- other public transportation vehicles
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- meat [poultry]
- [fish] producing establishments
- rendering plants
- [milk] [fruit] [vegetable]
- [wine] [ice cream] [potato]
- processing facilities

[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:

**ACCEPTED with COMMENTS**

**EPA Letter Dated:**

AUG 3 2011


72977-5
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  
nack counters  
cutting boards  
plastic and other non-porous chopping blocks  
coolers  
ices [machines] chests  
ice cream machines [equipment]  
yogurt machines [equipment] refrigerators 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  
scaiders  
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  
filtering line equipment  
Tanks  
Kettles  
filling, seaming, sealing and capping equipment  
pulpers  
juicers  
millers  
grinders  
cooks  
extractors  
blanchers  
refrigerators  
freeze  
microwaves  
toasters  
cooking equipment  
ovens  
ranges  
grills  
fryers  
choppers  
crispers  
cutters  
shelving  
ins  
cabinets  
sinks  
faucets  
output  
bakery equipment  
coffee and tea equipment  
steam tables  
warming equipment  
concession equipment  
[processing] vacuums  
[processing] hand [power] tools

ACCEPTED
with COMMENTS
EPA Letter Dated:
AUG 3  2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No.
72977-5

NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 3 of 12
General Information

SDC3A [this product] successfully killed the following organisms under AOAC protocols (In order to ensure that all organisms listed are killed, you must use the contact times as directed in the Application Instructions):

<table>
<thead>
<tr>
<th>Organism</th>
<th>Kill Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pseudomonas aeruginosa</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Salmonella enterica</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Staphylococcus aureus</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Staphylococcus aureus (VRE)</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Staphylococcus aureus (MRSA)</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Staphylococcus aureus (CA-MRSA)</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Staphylococcus aureus (CA-MRSA-PVL)</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Enterococcus faecium</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Enterococcus faecium (VRE)</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Methicillin resistant Staphylococcus aureus</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Methicillin resistant Staphylococcus aureus</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Community Associated Methicillin resistant</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Community Associated Methicillin resistant</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Community Associated Methicillin resistant</td>
<td>2 minutes</td>
</tr>
<tr>
<td>E. coli O157:H7</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Acinetobacter baumannii</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Campylobacter jejuni</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Carbapenem resistant E. coli</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Carbapenem resistant K. pneumoniae</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Carbapenem resistant K. pneumonia, NDM-1+</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Trichophyton mentagrophytes (Athlete's Foot Fungus)</td>
<td>5 minutes</td>
</tr>
<tr>
<td>HIV type 1 [Strain HTLV IIIB]</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Rotavirus</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Human Coronavirus</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Influenza A (H1N1)</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Swine Influenza A (H1N1)</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Respiratory Syncytial Virus [RSV]</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Adenovirus Type 2</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Avian Influenza A</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Influenza A [VR-544, Hong Kong strain]</td>
<td>30 seconds</td>
</tr>
<tr>
<td>Hepatitis B Virus [HBV] as Duck Hepatitis B</td>
<td>1 minute [60 seconds]</td>
</tr>
<tr>
<td>Hepatitis C Virus [HCV] as Bovine Diarrhea</td>
<td>1 minute [60 seconds]</td>
</tr>
<tr>
<td>Murine Norovirus [MNV-1]</td>
<td>1 minute [60 seconds]</td>
</tr>
<tr>
<td>Norovirus as Feline Calicivirus</td>
<td>1 minute [60 seconds]</td>
</tr>
<tr>
<td>Herpes Simplex Type 1 [VR-733 F(1) Strain]</td>
<td>1 minute [60 seconds]</td>
</tr>
<tr>
<td>Rhinovirus [R37 VR-1147, Strain 151-1]</td>
<td>1 minute [60 seconds]</td>
</tr>
<tr>
<td>Polio Type 2 [VR-1002, Lansing Strain]</td>
<td>1 minute [60 seconds]</td>
</tr>
</tbody>
</table>

[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 food contact surface sanitizer proven to kill 99.999% of the following bacteria in 60 seconds.**]

APPLICATION INSTRUCTIONS

Pre-clean surfaces prior to using this product. [You may use this product for pre-cleaning.]

[General Cleaning: Apply to surface until thoroughly wet then wipe the surface clean.]

General Disinfection:

For general disinfecion and control of the bacteria Pseudomonas aeruginosa, Staphylococcus aureus, Salmonella enterica, Staphylococcus aureus, Enterococcus faecium, Methicillin Resistant Staphylococcus aureus (MRSA), Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA), Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA-PVL), and Trichophyton mentagrophytes (Athlete's Foot Fungus). See application instructions for proper use.

NOTE: [Bracketed] text is optional wording. **Bold/italicized test is information only and not part of the label. Page 4 of 12**
Spray, pour or spread [SDC3A] [this product] on surface until thoroughly wet. Let stand for 60 seconds [one minute]. To Sanitize Food Contact Surfaces Fungicide, and Roser, Sanitation [of food contact surfaces] for Letter DC.

**NOTE:** [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 5 of 12

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

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**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 H1N1 are 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], [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.

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**Fungus Control:**

For effective control of the fungus Trichophyton mentagrophytes, the surface must be completely wet with [SDC3A] [this product] for 5 minutes. The surface may then be wiped dry with a clean towel. Re-apply when cleaning or when new growth appears.

**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 may then be wiped dry with a clean towel. Re-apply when cleaning or when new growth appears.

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**Viral Control:**

To kill Herpes Simplex Type 1 [F(1) Strain], Rotavirus, Human Coronavirus, Influenza A (H1N1), Influenza A Virus (H1N1), 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 H1N1 are 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.

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**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 the transmission of HIV, HBV or HCV is anticipated) with a 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 soiled with blood or body fluids, use appropriate barrier protection such as latex gloves, gowns, masks and eye coverings. Cleaning Procedure: Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of this disinfectant. Contact Time: Apply [SDC3A] [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 handled 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**

Spray, pour or spread [SDC3A] [this product] on surface until thoroughly wet. Let stand for 60 seconds [one minute]. The surface may then be wiped dry with a clean towel or allowed to air dry. No rinsing is required.

**NOTE:** [Bracketed] text is optional wording. **Bold/italicized text is information only and not part of the label.** Page 5 of 12
**[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-soak. Thoroughly wash objects to be sanitized with a good detergent or cleaner followed by a potable water rinse prior to applying sanitizer. No potable water rinse is allowed after application as a sanitizer.

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

If the [article] surface cannot be washed and rinsed, clean thoroughly in an appropriate fashion prior to sanitizing.

**[SDC3A]** [This product] is a ready to use sanitizer that eliminates 99.99% of the following bacteria in 60 seconds:

- Escherichia coli
- Staphylococcus aureus

-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
- Staphylococcus aureus

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

1. Scrape flush or presoak articles to remove gross food particles and soil.
2. Thoroughly wash articles in an appropriate detergent or cleaner.
3. Rinse articles thoroughly with potable water.
4. Sanitize articles by immersion in [SDC3A] [this product] for 60 seconds. Articles too large for immersion should be thoroughly wetted with [SDC3A] [this product] by rinsing, spraying or swabbing.
5. Remove immersed items from solution to drain and air dry. Non-immersed items should also be allowed to air dry.

[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.

1. Thoroughly wash equipment in a hot detergent solution. Rinse equipment thoroughly with potable water.
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.
4. Allow sanitized surfaces to drain and air dry. No potable water rinse is allowed.

[BEVERAGE 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.

[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.]

**NOTE:** [Bracketed] text is optional wording. **Bold/italicized test is information only and not part of the label. Page 6 of 12**
Wisconsin State Division of Health Directions for Eating Establishments

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

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

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:

- NSF Listed
- Include NSF Listing Number

NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 7 of 12
This statement will be used on NONREFILLABLE CONTAINERS.

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**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.

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

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**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.

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**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.
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 Vancomycin-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 seconds*.

Kills common household germs

Kills germs [on surfaces you touch most]

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

Kills [Salmonella], [Staphylococcus], [Listeria], and [E. coli].

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

Designed to save you time

Inspired by how you want [need] to disinfect

Invented to disinfect the way you want [need]

Your time is important so our kill times are fast

Meets EPA requirements for Toxicity Category IV

[Patented] Silver [Ion] Formula

No dulling residue

[Compatible with] [Safe for use on] [most] hard non-porous surfaces

Disinfects without bleaching

No harsh chemical smell

Odorless

Fragrance free

Contains no [dyes] or [artificial fragrances]

Contains [no] [non] VOC emitting ingredients

Ammonia free [formula]

NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 9 of 12
Bleach free [formula]
Alcohol free [formula]
Phenol free [formula]
Contains no phosphates
Does not contain [chlorine] bleach [or] [ammonia] [alcohol] [phenols]
[This product] contains no [chlorine] bleach [alcohol] [phosphates] [or ammonia]
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
[Worldwide] Patented formula
[U.S. Patents] 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]
Hospital [Line] [Disinfectant]
Consumer [Line] [Disinfectant]
Retail [Line] [Disinfectant]
Freight [Line] [Disinfectant]
Janitorial [Line]
Janitorial Disinfectant
Cruise Line Disinfectant
[FAST], [EASY], [EFFECTIVE]
[Antimicrobial] [antibacterial] disinfectant
Leaves surfaces disinfected
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

NOTE: [Bracketed] text is optional wording. **Bold/italicized text is information only and not part of the label. Page 10 of 12
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

ACCEPTED
with COMMENTS
EPA Letter Dated:
AUG 3 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered 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 11 of 12
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:

<table>
<thead>
<tr>
<th>Organism</th>
<th>ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staphylococcus aureus</td>
<td>ATCC#6538</td>
</tr>
<tr>
<td>Salmonella enterica</td>
<td>ATCC#10708</td>
</tr>
<tr>
<td>Listeria monocytogenes</td>
<td>ATCC#19111</td>
</tr>
<tr>
<td>Vancomycin resistant Enterococcus faecium (VRE)</td>
<td>ATCC#700221</td>
</tr>
<tr>
<td>Methicillin resistant Staphylococcus aureus (MRSA)</td>
<td>ATCC#700698</td>
</tr>
<tr>
<td>Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA)</td>
<td>NRS123, USA 400</td>
</tr>
<tr>
<td>Community Associated Methicillin resistant Staphylococcus aureus (CA-MRSA-PVL)</td>
<td>NRS 192</td>
</tr>
<tr>
<td>Escherichia coli O157:H7</td>
<td>ATCC#43888</td>
</tr>
<tr>
<td>Acinetobacter baumannii</td>
<td>ATCC#19606</td>
</tr>
<tr>
<td>Campylobacter jejuni</td>
<td>ATCC#29428</td>
</tr>
<tr>
<td>Carbapenem resistant Escherichia coli</td>
<td>BSL#082710-EcCP1</td>
</tr>
<tr>
<td>Carbapenem resistant Klebsiella pneumoniae</td>
<td>BSL#081710KPC4</td>
</tr>
<tr>
<td>Carbapenem resistant Klebsiella pneumoniae, NDM-1 +</td>
<td>ATCC#BAA-2146</td>
</tr>
<tr>
<td>Trichophyton mentagrophytes (Athlete's Foot Fungus)</td>
<td>ATCC#9533</td>
</tr>
<tr>
<td>*HIV type 1- Strain HTLV IIIB</td>
<td>HTLV-IIIb</td>
</tr>
<tr>
<td>*Herpes Simplex Type 1 VR-733 F(1) Strain</td>
<td>ATCC VR-733</td>
</tr>
<tr>
<td>*Rotavirus</td>
<td>Strain WA, Ottawa</td>
</tr>
<tr>
<td>*Human Coronavirus</td>
<td>ATCC VR-740</td>
</tr>
<tr>
<td>*Influenza A (H1N1)</td>
<td>ATCC VR-1469</td>
</tr>
<tr>
<td>*Swine Influenza A (H1N1)</td>
<td>ATCC VR-333</td>
</tr>
<tr>
<td>*Respiratory Syncytial Virus [RSV]</td>
<td>ATCC VR-26</td>
</tr>
<tr>
<td>*Adenovirus Type 2</td>
<td>ATCC VR-846</td>
</tr>
<tr>
<td>*Murine Norovirus</td>
<td>MNV-1.CW1</td>
</tr>
<tr>
<td>*Norovirus [as Feline Calicivirus]</td>
<td>ATCC VR-782</td>
</tr>
<tr>
<td>*Avian Influenza A</td>
<td>ATCC VR-2072</td>
</tr>
<tr>
<td>*Influenza A [VR-544, Hong Kong strain]</td>
<td>ATCC VR-544</td>
</tr>
<tr>
<td>*Rhinovirus [R37 VR-1147, Strain 151-1]</td>
<td>ATCC VR-1147</td>
</tr>
<tr>
<td>*Polio Type 2, [VR-1002, Lansing Strain]</td>
<td>ATCC VR-1002</td>
</tr>
<tr>
<td>Hepatitis B Virus (HBV) [as Quick Hepatitis B Virus]</td>
<td>Hepadnavirus Testing, Inc., Lot 7/31/07 pool</td>
</tr>
<tr>
<td>Hepatitis C Virus (HCV) [as Bovine Diarrhea Virus]</td>
<td>Strain Oregon.C24v-genotype 1</td>
</tr>
</tbody>
</table>

NOTE: [Bracketed] text is optional wording. *Bold/italicized text is information only and not part of the label. Page 12 of 12