

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460United States
Environmental Protection
Agency**Office of Pesticide Programs**

February 13, 2008

Robert S. Brennis
Lewis & Harrison
122 C Street, NW
Suite 740
Washington, DC 20001Subject: Spicer Randolph LLC
RE-OX
EPA Registration No. 74321-2
Application Date: November 21, 2007
Receipt Date: November 23, 2007

Dear Mr. Brennis:

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended to re-insert the cooling tower uses, is acceptable.

General Comments

A stamped copy of the accepted labeling is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please call Wanda Henson at (703) 308-6345.

Sincerely,

Emily H. Mitchell
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

RE-Ox[®] Deposit Control Disinfectant

Disinfectant, Sanitizer and Cleaner

Active Ingredient:	
Sodium Hypochlorite	0.05%
Other Ingredients	<u>99.95%</u>
Total	100.00%

Keep Out of Reach of Children

EPA Reg. No. 74321-2

EPA Est. 74321-KS-01

Net Contents: _____ gallons

ACCEPTED
FEB 13 2008
Under the Federal Insecticide, Fungicide, and
Rodenticide Act as amended, for the
pesticide, registered under
EPA Reg. No. 74321-2

Spicer Randolph LLC
1216 N 155th St.
Basehor, KS 66007

No-Precautionary Language Is Required On This Label Due To The Fact That All Routes Of Exposure Have Been Tested
At Toxicity Category IV

Physical or Chemical Hazards

Do not use this product with acids or ammonia.

{For product packaged in containers 5 gallons or larger:}

Environmental Hazards

This product is toxic to fish and aquatic organisms. 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.

DIRECTIONS FOR USE

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

RE-Ox is to be added to water to remove and prevent scales, residues and other deposits from forming in piping, equipment and condensing loops. RE-Ox disinfects precleaned equipment, floors, walls, drains and other hard, non-porous environmental surfaces and is effective as a sanitizing rinse of previously cleaned surfaces. RE-Ox disinfects against gram-negative and gram-positive organisms [pathogens] such as *Salmonella enterica* serovar Choleraesuis (ATCC 10708), *Staphylococcus aureus* (ATCC 6538), *Pseudomonas aeruginosa*(ATCC 15442). RE-Ox is a sanitizing rinse against *Staphylococcus aureus* (ATCC 6538) and *Salmonella enterica* serovar Choleraesuis (ATCC 10708) or similar.

Free Available Chlorine (FAC) Dilution

Required FAC (ppm)	Amount of RE-Ox added to 10 gallons of water
20	54 ounces
25	68 ounces
50	1.2 gallon
100	2.5 gallons
200	6.7 gallons
250	10 gallons

For Use in Non-Potable Process Water

Add RE-Ox to water to achieve the free available chlorine (FAC) levels as directed above. Verify the FAC levels with a suitable FAC test kit. Clean equipment/surfaces with potable water prior to application of RE-Ox-water solutions.

Disinfection of Hard, Non-porous Environmental Surfaces:

Use RE-Ox in homes and other domestic dwelling places, commercial, industrial and institutional establishments such as hospitals and other health-care/medical facilities, schools and other educational facilities, daycare and elder-care facilities, food processing/preparation/storage facilities, airports and other transportation facilities and offices. Use RE-OX to disinfect hard, non-porous environmental surfaces such as floors, walls, showers, bathtubs, toilet seats/rims/lids/bases, sinks, fixtures, cabinets, counters, countertops, door knobs, telephones, tables, chairs, etc. which are those made of stainless steel, chrome, glass, vinyl, glazed porcelain, non-porous plastics, enamel and glazed tile.

Prior to disinfection, thoroughly clean all surfaces/objects making sure to remove all gross filth or heavy soil. To disinfect surfaces/objects, use this product as is (no dilution required) and apply by sponge, mop or spray making sure to thoroughly wet all surfaces/objects. Allow RE-Ox to remain on surfaces/objects for 5 minute prior to wiping with a clean cloth or paper towel, or simply allow surfaces/objects to air dry. Alternatively, RE-Ox can be diluted 1:2 with water and used in the same manner but with 10 minutes of contact time.

Sanitization of Food-Contact Surfaces

Use RE-Ox in public eating establishments (such as restaurants, cafeterias, bars, taverns), dairies and food processing plants to sanitize hard, non-porous food contact surfaces as identified below. Use a mop, sponge, cloth, low pressure coarse sprayer or hand-pump trigger sprayer to apply RE-Ox.

Prior to application, remove all gross food particles and soil from surfaces that are to be sanitized, by a pre-flush, pre-soak or pre-scrape and when necessary, pre-soak treatment. Thoroughly wash or flush surfaces with a good detergent followed by a potable water rinse before applying this product.

To sanitize fixed items such as tanks, finished wood or plastic chopping blocks, food process equipment (grinders, slicers, choppers), food work areas, finished wood or plastic tables, appliances and countertops, thoroughly wet surfaces and allow items to remain wet for at least one minute. Allow surfaces to drain wet and air dry. Do not rinse or wipe treated surfaces/objects.

To sanitize mobile items such as drinking glasses, cookware, dishware and eating utensils, completely immerse items in RE-OX for at least one minute or longer if specified by local government sanitary code. Place sanitized items on a rack or drain board to air dry. Do not rinse or wipe.

To sanitize food contact surfaces in public eating establishments, dairy-processing equipment and food-processing equipment and utensils regulated under 40 CFR § 180.940, completely immerse articles in RE-Ox for at least one minute. Remove immersed items from solution to drain and then let air dry. Thoroughly wet articles too large for immersion by rinsing, spraying or swabbing and allow to drain, then air dry.

Egg Sanitization

Thoroughly clean all eggs. Spray a warm (not over 130°F) 250 ppm FAC solution to thoroughly wet eggs. Allow the eggs to dry before casing or breaking. Do not rinse eggs with potable water. Do not reuse solution to sanitize eggs.

Fruit and Vegetable Washing

Thoroughly clean all fruits and vegetables in a wash tank. In a second recirculating wash tank, prepare a solution of 25 ppm FAC. Submerge fruit and/or vegetables for 2 minutes in the second tank. Spray rinse vegetables with the sanitizing solution prior to packaging. Rinse fruit with RE-OX-treated potable water only prior to packaging.

Sanitization of Non-Porous Food Contact Surfaces:

Rinse Method: Rinse with a 100 ppm FAC (1:4 dilution of product) solution of RE-Ox. Confirm FAC with on-site chlorine test. Allow solution to contact surfaces for at least one minute. Test, and periodically adjust the FAC content as necessary, to ensure that the FAC does not fall below 50 ppm. Do not soak overnight and do not rinse treated surfaces.

Immersion Method: Immerse equipment with a 100 ppm FAC (1:4 dilution of product) solution of RE-Ox. Confirm FAC with on-site chlorine test. Allow solution to contact surfaces for at least one minute. Test, and periodically adjust the FAC content as necessary, to ensure that the FAC does not fall below 50 ppm. Do not soak overnight and do not rinse treated surfaces. Do not rinse surfaces; allow solution to drain and air dry.

Flow/Pressure Method: Disassemble, clean and reassemble equipment prior to sanitization. Pump a solution containing 100 ppm FAC (1:4 dilution of product) solution of RE-Ox. Confirm FAC with on-site chlorine test. Allow solution to contact surfaces for at least one minute. Test, and periodically adjust the FAC content as necessary, to ensure that the FAC does not fall below 50 ppm until full flow is achieved at all extremities, the system is completely filled with sanitizing solution and all air is removed from the system. Close drain valves and hold under pressure for at least one minute to ensure contact with all internal surfaces. Test solution from drain valve; if effluent contains less than 50 ppm, repeat entire cleaning/sanitizing process.

Clean in Place Method: Clean equipment after use and prior to sanitization. Pump a solution containing 100 ppm FAC (1:4 dilution of product) solution of RE-Ox. Confirm FAC with on-site chlorine test. Allow solution to contact surfaces for at least one minute. Test, and periodically adjust the FAC content as necessary, to ensure that the FAC does not fall below 50 ppm.

until full flow is achieved at all extremities, the system is completely filled with sanitizing solution and all air is removed from the system. Close drain valves and hold under pressure for at least one minute to ensure contact with all internal surfaces. Test solution from drain valve; if effluent contains less than 50 ppm, repeat entire cleaning/sanitizing process.

Spray/Fog Method: Pre-clean all surfaces after use and prior to sanitization. Thoroughly spray or fog all surfaces until wet with a 100 ppm FAC solution. Allow surfaces to air dry. Prior to using equipment, rinse all surfaces with a 100 ppm FAC solution. Rinse spray/fog equipment with potable water after sanitization operation.

Cooling Tower/Evaporative Condenser Water

Slug Feed Method – Initial Dose: When system is noticeably fouled, apply 100 to 200 gal. of this product per 10,000 gallons of water in the system to obtain from 5 to 10 ppm available chlorine. Repeat until control is achieved. **Subsequent Dose:** When microbial control is evident, add 20 gal. of this product per 10,000 gallons of water in the system daily, or as needed to maintain control and keep the chlorine residual at 1 ppm. Badly fouled systems must be cleaned before treatment is begun.

Intermittent Feed Method – Initial Dose: When system is noticeably fouled, apply 100 to 200 gal. of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine. Apply half (or 1/3, 1/4 or 1/5) of this initial dose when half (or 1/3, 1/4 or 1/5) of the water in the system has been lost by blowdown. **Subsequent Dose:** When microbial control is evident, add 20 gal. of this product per 10,000 gallons of water in the system to obtain a 1 ppm residual. Apply half (or 1/3, 1/4 or 1/5) of this initial dose when half (or 1/3, 1/4 or 1/5) of the water in the system has been lost by blowdown. Badly fouled systems must be cleaned before treatment is begun.

Continuous Feed Method – Initial Dose: When system is noticeably fouled, apply 100 to 200 gal. of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm FAC residual. **Subsequent Dose:** Maintain this treatment level by starting a continuous feed of 2 gal. of this product per 1,000 gallons of water lost by blowdown to maintain a 1 ppm residual. Badly fouled systems must be cleaned before treatment is begun.

{For product packaged solely for homeowner use:}

Storage and Disposal

Storage: This product degrades with age. Protect from sunlight. Keep refrigerated or in insulated containers if refrigeration is not available. Store in areas inaccessible to children or pets. Do not store in temperatures greater than 80°F. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agent for disposal instructions.

{For product packaged in containers of 1 gallon or less and not solely for homeowner use:}

Storage and Disposal

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

Storage: This product degrades with age. Protect from sunlight. Keep refrigerated or in insulated containers if refrigeration is not available. Do not store in temperatures greater than 80°F. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agent of 1-800-CLEANUP for disposal instructions.

{For product packaged in containers greater than 1 gallon:}

Storage and Disposal

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

Pesticide Storage: This product degrades with age. Protect from sunlight. Keep refrigerated or in insulated containers if refrigeration is not available. Do not store in temperatures greater than 80°F. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** Triple rinse, or equivalent, then offer for recycling, return or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration; or if allowed by state and local authorities, by burning (if burned, stay out of smoke).

[] = optional/alternate language

{ } = language that does not appear on the market label