89526-1

12/6/2012

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

DEC - 6 2012

CEPA United States Environmental Protection Office of Pesticide Programs

Sanosil USA, LLC 100 Dean Drive Newark, Delaware 19711

AGENT: Lewis and Harrison 122 C Street, N.W., Suite 740 Washington, D. C. 20001

Attention: Georgia Anastasiou

Subject: **Sanosil S010** EPA Registration No. 84526-1 Notification Dated November 16, 2012

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c)(9).

Proposed Notification:

- Minor Labeling Changes

General Comments:

Based on a review of the submitted material, the following comments apply:

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

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)

ease read instructions on reverse befo				d OMB No Se	/0-0060, Approval expires 05-31-98
	United States rironmental Protec Washington, DC 2	tion Agency	Regist	ration	OPP Identifier Number
		·	Sticide - Sectio		
1. Company/Product Number			Product Manager		3. Proposed Classification
84526-1			all Swindell		
4. Company/Product (Name) Sanosil S010		PM# Team	33		
5. Name and Address of Applicant (1 Sanosil International, LLC 91 Lukens Drive, New Castle, Delaware 19720 <u>PLEASE SEND ALL CORRI</u> "CONTACT POINT" LISTE	<u>ESPONDENCE TO</u> <u>D BELOW</u>	(b)(l), to: EPA F		ar or identica	
Check if this is a new a	ddress	Section	on - II		
Amendment - Evolain below				nels in response	to Agency letter dated
Amendment – Explain below. Resubmission in response to Agency letter dated			"Me Too" Applic	•	ינט אשפווטא ובונפו עמופט
Notification - Explain below.			Other - Explain		
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EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete

White- EPA File Copy (original) Yellow- Applicant Copy

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LEWIS & Harrison

Consultants in Government Affairs

122 C Street, N.W., Suite 505 Washington, D.C. 20001

telephone 202.393.3903 fax 202.393.3906

November 16, 2012

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Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) US Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington VA 22202

ATTENTION: Marshall Swindell Product Manager, Team 33

SUBJECT:Sanosil International, LLCSanosil S010 (EPA Reg. No. 84526-1)Notification in Accordance with PR Notice 98-10

Dear Mr. Swindell:

On behalf of Sanosil International, LLC, I am submitting a notification for the product. Sanosil S010 (EPA Reg. No. 84526-1). I have made the following changes to the label.

- 1. Corrected the company name and address.
- 2. Added additional graphics to depict the professional use sites on page 9.

Enclosed please find the following documents in support of this submission:

- a) Application for Pesticide Notification which includes a signed statement certifying compliance with PR Notice 98-10;
- b) One (1) copy of the revised label with changes highlighted; and,
- c) Two (2) copies of the revised label.

If you have any questions and/or comments about the enclosed submission, please contact me by telephone at 202-393-3903 ext. 19 or by e-mail at georgia@lewisharrison.com.

Sincerely,

Georgia anastasion

Georgia Anastasiou Agent for Sanosil International, LLC

cc: Chris Ungermann (Sanosil) David Lach (Sanosil)

(Note: Bold, italicized text is information for the reader and is not part of the label).

Sanosil® S010

Bactericide and Virucide^{*} Effective against Mold and Mildew Industrial/Animal Facility/Farm Use

Active Ingredients:	1
Hydrogen Peroxide	5.00%
Silver	0.01%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [back] [side] [right] [left] panel for additional precautionary statements.

Net Contents: (as indicated on container)

EPA Reg. No. 84526-1 EPA Est. No. (as indicated on container)

[See bottom or side for Lot/Data code]

Questions? Comments? [symbol of telephone] Call: (1-800-726-6765) [or] Visit us at (www.sanosilglobal.com) [Made in [Switzerland] [USA]] Distributed by: Sanosil International, 91 Lukens Drive, New Castle, DE 19720 [or an authorized Sanosil International distributor (insert name)] Sanosil® is a licensed trademark of Sanosil Ltd. Switzerland

<u>Optional Marketing Claims: (note that these claims may or may not appear on the</u> <u>commercial label; in addition, the claims may be used as bullet points or in a paragraph</u> <u>format)</u>

Miscellaneous Claims Introductory New (this claim will only be used for the first six months after commercial introduction) (Fresh) (Neutral) (Lemon) (scent) (Unscented) Anytime (to-go) All-purpose Bleach (Chlorine) (Bleach and Chlorine) (Alcohol) free (formula) (technology) (disinfection) (disinfectant) (sanitization) (sanitizer) **Dries quickly** Dual Action (active) (system) (formula) Everyday formula Fast, Easy, Effective Frequent (regular) use formula Great for frequent use Leaves (household) surfaces sanitary (disinfected) (Scent free) (suitable for frequent use) Modern (Classic) On-the-ao Ready to Use (formula) (no mixing required) The (disinfectant) (sanitizer) for the new era To-Go (anvtime) Versatile Formula A technology that is enough to use around your family or pets (on the surfaces they touch the most) (Contains) no (lingering) (cleaning) chemicals **Deodorizes sponges** (Easy) (quick) (convenient) to use (Economy) (institutional) (value) (travel) (business) (size) (pack) Contains hydrogen peroxide, which breaks down into water and oxygen No (accidental whitening) Use throughout the (your) (home) (house) Makes your job easier No (mixing) (or) (dilution) (labor) required (Daily) sanitizing spray (Perfect) (ideal) for (business) (vacation) travel New Size Bonus Size Mini Pocket (size) (pack) Portable (size) (pack) Purse (size) (pack) Travel (size) (pack) Trial (size) (pack) Value (size) (pack)

General Product Performance/Usage Claims

(Bactericidal) (Bactericide) (Disinfectant) (Disinfects] [Daily] [Multi-Action] (Multi-Purpose) (Multi-Room) (Multi-surface) (Disinfectant) (Sanitizer) (Virucidal^{*}) (Virucide^{*})

(Kills pathogenic bacteria and viruses)

Sanosil S010 meets EPA standards for a (hospital) (home) (commercial) (institutional) (industrial) disinfectant.

Mold and mildew buster

Kills bacteria and viruses*

Sanosil S010 is a ready-to-use mold control agent

Sanosil S010 is effective against mold

Sanosil S010 inhibits mold and eliminates musty odors

Sanosil S010 can be used on bathroom and shower surfaces, walls, floors, tile, fiberglass, grout and plastic.

Controls kitchen odors caused by (insert bacteria) (bacteria)

Controls pet odors caused by (bacteria)

(This product) Deodorizes by killing (many) (bacteria) that cause odors.

Deodorizing by killing odor-causing (bacteria) at their source

Eliminates (removes) odors (caused by) (bacteria)

Gets rid of odors by killing the (bacteria) (that cause them)

Gets to the heart of odors

Helps prevent the build-up of odors by killing odor-causing bacteria (on hard non-porous non-food contact surfaces)

Odor fighter

Perfect for eliminating your toughest odors at their source

(This product) Eliminates odors at their source

(This product) prevents odors at their source caused by (bacteria)

To eliminate odors use (this product) around (insert use sites) (insert use surfaces){insert use sites)

Disinfects hard non-porous (non-food) contact surfaces (such as) (insert use sites)

Disinfects (insert use sites) (and) (insert use surfaces)

For Hospital Use (graphics)

(For use in) hospitals (and homes) (as a) (disinfectant)

For use (on) (in) (insert use sites)(insert use surfaces)

For use in institutional, (animal care) (restaurants) (food-handling establishments) (and industrial) (facilities)

For use on hard, non-porous surfaces located in: (insert use sites)

Great for spot disinfection (target performance)

Simply spray (this product) on surfaces that you and your family and pets come in contact with everyday (including): (insert use surfaces)

(This product) (disinfects) (and) (sanitizes) (deodorizes) (the following surfaces) (insert use surface)

(This product) (disinfects) (and) (sanitizes) (in) (the following areas) (insert use sites)

General Product Performance/Usage Claims (continued)

Treats, does not cover up (No residue) (No need to rinse after use) as a sanitizer and disinfectant Use on hard to reach areas (like nooks and crannies)

Use this product (in) (under) (around) (on) (insert use site)

Ready to use Use this product (on) (insert use surfaces)

Specific Sanitizing Claims

An effective sanitizer for non-food contact surfaces (for use in (insert use sites) (Sanitizer) Great for use as a non-food contact surface sanitizer in (insert use sites). Kills (Destroys) (Eliminates) 99.9% of bacteria Kills (Destroys) (Eliminates) 99.9% of bacteria on hard, non-porous surfaces Kills (Destroys) (Eliminates) 99.9% of bacteria on hard, non-porous (kitchen)(bathroom)(household) surfaces Kills (99.9%) (of) (household) bacteria Leaves (household) surfaces (sanitized) (and) (or) (disinfected) Sanitizes (kitchen) (household) (bathroom) (restroom) (non-food contact) surfaces Sanitizes (Kitchen) (household) (bathroom) (hard non-porous) (surfaces) Sanitizer (Sanitizes)

Specific Disinfecting Claims

An effective disinfectant for use in the kitchen, bathroom, bedroom and other household areas (Controls)(Kills) odor-causing (bacteria)

Disinfection Control (Formula)

Disinfects (sanitizes) and deodorizes by killing (bacteria and viruses^{*}) and controlling their odors.

Dries, kills (bacteria)

(Salmonella) (Staph) (MRSA) (Enterobacter Aerogenes) control

Effective against bacteria

Eliminates bacteria (viruses^{*}) (and) (odors) on hard non porous surfaces that you (and) (your family) (your children) come into contact with everyday

Fights (and) (kills) odors

(Bacteria) (Virus^{*}) (killer) (destroyer)(eliminator)

Kills the viruses associated with the flu and the common cold.

Kills the (flu) (common cold) virus

Kills antibiotic resistant bacteria (MRSA)

Kills (Destroys) (Eliminates) (of) (bacteria) on hard non porous surfaces

Kills antibiotic resistant bacteria (Methicillin Resistant) (Staphylococcus aureus) (MRSA)

Kills (bacteria) (eliminates odors) (and) (deodorizes)

Kills (bacteria) helps (leaves) your house (home) smell (smelling) clean (and) (fresh)

Kills (bacteria) (whenever) you need it

Kills (household) (kitchen) (bacteria) on hard non porous, nonfood contact surfaces Kills (kitchen)(household)(bathroom)

Kills (most) Household (bacteria)

On hard, non-porous, non-food contact surfaces this product kills bacteria

Surface Disinfectant

(This product) (controls) (kills) the (bacteria) that cause unpleasant odors (at the source), (This product) (also) eliminates odor causing (bacteria) (at their source) (to leave your home smelling fresh and clean).

Specific Disinfecting Claims- (continued)

(This product) (helps) reduce cross contamination of (antibiotic resistant bacteria) (on hard, non-porous surfaces)

(This product) (helps) (aids) in the reduction of cross contamination of (antibiotic resistant Sanosil S010 (EPA Reg. No. 84526-1) EPA Label 11/16/2012 bacteria) (on hard, non-porous surfaces)

(This product) (helps) (fight the spread of) (antibiotic resistant bacteria) (on hard, nonporous surfaces)

(This product) kills the (bacteria) that cause (bad) odors

(This product) kills bacteria on hard non porous, nonfood contact surfaces in your home and in public places.

You can also use (this product) in places that are difficult to (disinfect) (sanitize) (reach) such as nooks and crannies

Your family comes in contact with bacteria everyday (both in the home and in public (places) (this product) kills bacteria on commonly touched on hard non porous, nonfood contact surfaces (in your home) (in public places) (in hotel rooms)

H1N1 Claims:

-Respiratory illnesses attributable to Pandemic 2009 H1N1are caused by influenza A virus. [Sanosil S010] [this product] is a broad-spectrum hard surface disinfectant that has been shown to be effective against influenza A virus (H5N1) (influenza) (flu virus) (Strain VNH5N1-PR8/CDC-RG CDC #2006719965) and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).

-[Sanosil S010] [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.

-[Sanosil S010] [This product] has demonstrated effectiveness against influenza A virus (H5N1) (influenza) (flu virus) (Strain VNH5N1-PR8/CDC-RG CDC #2006719965) 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.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read the entire label before using the product.

Prior to disinfection or sanitization, preclean surface. For use on non porous, nonfood contact surfaces only. Hold (spray bottle) (container) (product) upright 6" to 8" from surface. Spray 2 to 3 seconds until (thoroughly) (wet) (covered with mist)

To Disinfect: Let stand for ten (10) minutes (to air dry) (rinsing not required) (If desired) (wipe with paper towel) (clean dish towel) (or) (clean microfiber towel).

To Sanitize: Let stand for 5 (five) minutes (to air dry) (rinsing not required) (If desired) (wipe with paper towel) (clean dish towel) (or) (clean microfiber towel).

To Deodorize: Spray on surfaces as needed (let air dry)

Do not use on polished wood, painted surfaces, leather, rayon fabrics, or acrylic plastics.

To control mold and mildew:

1) Spray mold and mildew contaminated surfaces with Sanosil S010. Be sure to cover the entire area with spray.

2) Let air dry for at least 10 minutes.

3) Thoroughly wash, scrub and brush off visible residue with a synthetic brush and hot, soapy water.

4) Rinse with a wet cloth and let dry.

5) In approximately 2-3 hours, or when surface has dried, apply a second layer of Sanosil S010 following the instructions in Step 1. Let dry.

Depending on the extent of contamination, the treatment can be repeated every 2-3 days. Allow the surface to dry completely between each application.

Refilling or Spray Bottles

To refill (spray bottles):

- 1. (Remove) Remove trigger sprayer (or) cap from empty bottle
- 2. (Pour) Unscrew cap on refill and pour contents directly into empty bottle.
- 3. (Use) Replace trigger sprayer and use as you normally would (or) unscrew cap and transfer your trigger to this bottle.

<u>Organisms</u>

Studies conducted with Sanosil S010 have demonstrated that the product kills the following bacteria and viruses:

Bacteria:

Pseudomonas aeruginosa (Pseudomonas) (ATCC # 15442) Staphylococcus aureus (Staphylococcus) (Staph) (ATCC 6538) Salmonella enterica (Salmonella) (ATCC 10708) (Methicillin Resistant) Staphylococcus aureus (Staph) (MRSA) (ATCC 33592) Enterobacter aerogenes (ATCC 13048) Escherichia coli (E coli) (ATCC 11229) [Sulfate Reducing Bacteria]

<u>Viruses</u>

Human Immunodeficiency Virus type 1 (HIV) (Stain HTLV-III_B) Influenza A strain Hong Kong (flu virus) (ATCC VR-544) Influenza A (H5N1) (influenza) (flu virus) (Strain VNH5N1-PR8/CDC-RG CDC #2006719965) Rhinovirus type 37 (Rhinovirus) (common cold virus) (ATCC BR-1147, Strain 151-1)

Fungi

Trichophyton mentagrophytes

Fogging

Fogging of Sanosil S010 can be used for disinfecting hard, nonporous surfaces in rooms as an adjunct following regular manual cleaning and disinfecting of room surfaces. Sanosil S010 ready to use product is recommended for use in fogging operations as a supplemental measure either before or after regular cleaning and disinfecting procedures. Fog until the area is moist using foggers according to manufacturing's use directions.

<u>SURFACES (- Graphic — depicting surface)</u>

[FOR USE ON] Hard Non-porous, non-food contact surfaces:

Enamel, Sealed Granite, Brass, Glass, Chrome, Glazed ceramic tile, Copper, Glazed Porcelain, Stainless Steel, Linoleum, cultured marble, Vinyl (tile), synthetic marble. Do not use on glasses, dishes and utensils or other food contact surfaces.

Bathroom surfaces, Exterior surfaces of (Microwave [oven], Oven, Refrigerators), Bathtub (Tub), Examination tables, Mirror, Remote controls, Telephones, Bed Frame Fixtures, No wax floors, (Resilient)(ceramic)Floor, Bed Springs, Floors, non-wood baby furniture, Salad Bar Sneeze Guards, Bidet Faucets (non-wood), Cabinets, garbage (cans) (pails), (non-wood) chairs, Shower (Stall) (Area), Cat litter boxes, (non-wood) crib, Shower (curtain)(plastic)(liner)(and glass-topped), Furniture (non-wood), Highchair (non-wood), Sinks (basin), Clean-up carts, Sports equipment, Nonfood contact Counter (Countertop), Crystal, (Non-wood) Outdoor Stretchers, (Household) tools (patio), Nonfood contact table (tabletops), Desk Laminate (surfaces), Parquet Tin (Diaper) changing tables, Lamps, Patient Chairs,

Nonfood contact (Counters) and (tables), Linen carts, Plastic Toilet (Seats) (areas), Diaper Pails, Plastic (baby) (Children)Toys, (Toilet) (Urinal), Litter boxes, Plastic Laundry Basket (Hamper), Under sinks Dish Racks, Plastic mattress covers, Door Knob (handle), Washable Wall Paper, Dressing carts, Wheelchairs, Metal Portable Toilets, Whirlpool interiors, Metal Blinds, Recycling bins, Windows (windowsills), (Electronic) remote controls

[FOR USE IN:]

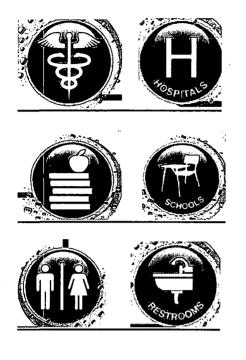
HOUSEHOLD USE SITES (- Graphic — depicting surface)

Attic (damp), Storage Area Rooms, Laundry Room, Public eating places Automobile, Den, Study, Litter boxes, Public places Basement, Dining Room, Living Room, (Public) restrooms Bathroom, Dorm lockers, Sunroom Bedroom, Family Room, Mobile Home, Supermarket (grocery store) Boat, Garage, Mud Room, Tool Shed Camper Home, House, Nursery, Vacation home Car, (Home) Workshop, Pet areas, Vehicles Closets, Kitchen, Playroom

PROFESSIONAL USE SITES (Graphic — depicting surface)

Airplane, Factory, Kitchen(s), Public places Air conditioning and/or heating vents Ambulance, Gymnasium(s) (gym), Laboratory, (Public) restrooms Blood Bank, Health Care Facility, Manufacturing Plant(s), Public telephones (booth) Boat, Health Club(s), (Medical) Clinic, Recreational Center Bowling Alley, Hospital(s), Military Installation, Restaurant(s) Business, Hotel, Motel, Nursery, Child Care Centers, School(s) Cafeteria, Infirmary, Nursing Home(s), School Bus Campground (facility), Industrial, Building Office (Buildings), Offices, Shelters Clinics, Institutional, Patient Rooms, Sick rooms, College (Institutional), Bathroom(s), Pharmacy, Toll Booth, Commercial Building(s), (Institutional) kitchen, Physicians Office, Train Interiors Convenience stores (Institutional), Laundromat, Playground (facility), Veterinary (office)(clinic)(facilities), Day Care Centers, (Institutional) Restroom, Public eating places, Waiting Rooms Dental Office, Kennel, Public facility, Warehouse, Club Doctors Office, Universities, Vehicles Sanosil S010 (EPA Reg. No. 84526-1) EPA Label 11/16/2012

Optional Graphics depicting Professional Use Sites



Sanosil S010 (EPA Reg. No. 84526-1) EPA Label 11/16/2012 ¢

Disinfection and Deodorzing Animal Housing Facilities and Buildings, Farm Equipment, Poultry Premises, Coops, Trucks and Crates

- 1. Remove all animals/poultry from the facilities, items/areas to be disinfected.
- 2 Remove gross soils, liters, droppings, etc with a warm water flush or by sweeping.
- 3. Empty all troughs, racks, and other feeding and watering equipment.
- 4. Thoroughly clean all surfaces with detergent or cleaning solution and rinse with water.
- 5. Make sure area is well-ventilated prior to initiating treatment.
- 6. To disinfect, saturate surfaces with a disinfecting solution for at least 10 minutes.

7. Prior to reuse, thoroughly scrub treated feed equipment (e.g, feed racks, troughs, fountains, etc.) with a detergent and rinse with water.

8. Keep animals/poultry out of treatment areas and/or do not use treated equipment until solution has been completely absorbed and air dried.

Poultry Hatchery Disinfection

1. Remove any eggs, chicks, poultry and feeds along with all gross soils and other hatchingrelated debris.

2. Thoroughly clean all surfaces with an appropriate detergent or cleaning solution; then rinse with water.

3. Make sure area is well-ventilated prior to initiating treatment.

4. Apply disinfecting solution via wiping, mopping, spraying, or fogging Let the use-solution soak in on the treated surface for at least 10 minutes and then allow to air dry.

5. Reintroduce eggs and chicks after all surfaces have dried.

PHYSICAL AND CHEMICAL HAZARDS

This product is incompatible with oxidizing and reducing agents.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

FIRST AID

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.

[[Questions?][Comments], [or] in case of an emergency, call toll free (1-877-SANOSIL or 1-877-726-6745).] Have the product container or label with you when calling a Poison Control Center, or doctor, or going for treatment.

STORAGE AND DISPOSAL: Do not contaminate water, food, or feed by storage and disposal. Keep out of direct sunlight and away from heat. Do not freeze. Store in original container in areas inaccessible to small children and pets.

(Note to Reviewer: One of the following statements will be used) Nonrefillable container. Do not reuse or refill this container except as described in the directions for use.

-or-

Nonrefillable container. Do not reuse or refill this container.

If product leaking or spills should occur, please dilute with water and dry with absorbent material, or dilute with water as it is flushed into waste water drain. Offer for recycling, if available or (replace cap and) discard in trash.