



U.S. ENVIRONMENTAL PROTECTION AGENCY
 Office of Pesticide Programs
 Antimicrobials Division (7510P)
 1200 Pennsylvania Ave., N.W.
 Washington, D.C. 20460

EPA Reg. Number:

88161-1

Date of Issuance:

9/19/16

NOTICE OF PESTICIDE:

Registration
 Reregistration
 (under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Pathonex

Name and Address of Registrant (include ZIP Code):

Bob Adams
 Spraying Systems Company
 16815 Southpark Drive
 Westfield, IN 46074

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Antimicrobials Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Demson Fuller, Product Manager 32
 Regulatory Management Branch II,
 Antimicrobials Division (7510P)

Date:

9/19/16

2. You are required to comply with the data requirements described in the DCI identified below:

a. Chlorine Gas GDCI-020501-1405

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Reevaluation Team Leader (Team 36): <http://www2.epa.gov/pesticide-contacts/contacts-office-pesticide-programs-antimicrobial-division>

3. Make the following label changes before you release the product for shipment:

- Revise the EPA Registration Number to read, "EPA Reg. No. 88161-1."

4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 09/09/2016

If you have any questions, please contact Wanda Henson by phone at (703) 308-6345, or via email at henson.wanda@epa.gov

Sincerely,



Demson Fuller, Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

ACCEPTED

09/19/2016

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 88161-1

Pathonex

Hypochlorous Acid Solution

Effective against salmonella enterica, staphylococcus aureus, odor-causing bacteria

Residential, Commercial, and Industrial Food Contact Surface Sanitizer

For use on previously cleaned, hard, non-porous surfaces in:

- + Fisheries, Hatcheries and Egg Processing/Packaging Plants
- + Meat, Fish and Poultry Processing/Packaging Plants
- + Wineries, Breweries, juicers, soft drink bottlers and all other Beverage Plants
- + Milk and Dairy Products processing/Packaging Plants
- + Seafood and Produce Processing/Packaging Plants
- + Food Processing/Packaging Plants
- + Eating Establishments
- + Food Grade Transport
- + Bakeries
- + Produce Harvesting
- + Food Grade Storage
- + Blenders(food)
- + Veterinary clinic
- + Airplanes, Trains, Busses, and Cruise Ships
- + Automobiles and Boats
- + Day Care, Schools, and Colleges
- + Dormitories
- + Hotels
- + Public Areas
- + Recreational Areas
- + Manufacturing Facilities
- + Military Installations

| | |
|---|-----------|
| Active Ingredient: Hypochlorous Acid | 00.0181% |
| Other Ingredients: | 99.9819% |
| Total | 100.0000% |

Contains 180 ppm Free Available Chlorine (FAC)

Keep Out of Reach of Children

This product must be used within 30 days of the production date indicated on the label. Intended to be used immediately after production. Product may be tested with chlorine test kit approved by Pathonex manufacturer. Do not use product less than 163 ppm of Hypochlorous Acid

DATE PRODUCED: _____ LOT No.: _____

Manufactured by:
Spraying Systems Company
16815 Southpark Drive
Westfield, IN 46074

EPA Registration No.: 88161-R

EPA Est.: 88161-IN-001

Net Contents: 1L, 1gal, 2gal, 10gal, 26gal, 55gal, 80gal, 100gal, 300gal
2 oz., 4 oz., 16 oz., 24 oz., 32 oz.

Directions for Use on Hard, Non-Porous, Food-Contact Surfaces

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

To Sanitize [and Deodorize] Hard, Non-Porous Food Contact Surfaces:

1. Remove large soil particulate, and clean surface with [PathoClean], [Klarion Cleaner], or other cleaning solution.
2. Apply [spray, wipe, or soak] Pathonex with cloth, sponge, or sprayer onto the pre-cleaned surface.
3. Allow a contact time of one (1) minute.
4. Air dry or wipe dry. Must rinse or wipe dry on metal surfaces.

To Sanitize [and Deodorize] Conveyors, Peelers, Slicers, and Saws for Food Processing:

1. Remove large soil particulate by spraying or wiping all surfaces of equipment with water
2. Clean surface with [PathoClean], [Klarion Cleaner], or other cleaning solution with similar application method
3. Apply [spray, wipe, or soak] Pathonex with cloth, sponge, or sprayer onto the pre-cleaned surface.
4. Allow a contact time of one (1) minute.
5. Air dry or wipe dry. Must rinse or wipe dry on metal surfaces.

To Sanitize [and Deodorize] Holding Tanks

1. Remove large soil particulate by spraying fresh water, preferably with a tank cleaning device, until all surfaces have been covered.
2. Clean surfaces by spraying [PathoClean], [Klarion Cleaner], or other cleaning solution, preferably through a tank cleaning device, until all surfaces are clean
3. Apply Pathonex to all surfaces, preferably with a tank cleaning device, until all surfaces have had contact time of one (1) minute.
4. Must rinse with fresh water, preferably with a tank cleaning device, for any metal tanks.

To Sanitize [and Deodorize] Process and Plumbing Lines

1. Flush out any large soil particulate with fresh water
2. Continuously flush [PathoClean], [Klarion Cleaner], or other cleaning solution through process or processing lines until surfaces are clean
3. Continuously flush Pathonex through process or plumbing lines until all surfaces have one (1) minute of contact time.
4. Continuously flush lines with fresh water until all Pathonex has been purged from the processing lines.

| Target Pathogen | Strain | Contact Time |
|--|-----------|--------------|
| Salmonella Enterica Subspecies Enterica Serovar Typhi | ATCC 6539 | 1 minute |
| Staphylococcus Aureus | ATCC 6538 | 1 minute |

Storage and Disposal

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

Pesticide Storage: Store in a closed plastic container in a cool, dry location away from heat and sunlight. Do not shake. Do not store near easily oxidizable materials, acids, and reducers. In case of spill, isolate container (if possible) and flood area with water to dissolve all material before disposing this container in trash.

Emergency Handling: In case of contamination or decomposition. Do not reseal container. Isolate in open, well-ventilated area. Flood with large amounts of water. Cool unopened containers in vicinity by water spray.

Pesticide Disposal: Pesticide wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Improper disposal of excess pesticide, spray mixture or rinsate is violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the EPA Regional Office for guidance.

Container Handling: Refillable container. Refill this container with Pathonex 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 person refilling this container. To clean the container before final disposal, empty the remaining contents into application equipment or a mix tank. Fill container about 10 percent full with water. Agitate vigorously or recirculate water with pump for 2 minutes. Dispose of rinsate as pesticide waste. Repeat the rinsing procedure two more times. Then offer for recycling if available or puncture and dispose of in sanitary landfill, or by incineration, or by procedures allowed by state and local authorities.

Physical or Chemical hazards

Pathonex is not compatible with other chemicals such as acids and hydrogen peroxide. **Pathonex** is an electrolytic activated aqueous solution produced by separating the ions of a brine solution through selectively permeable membranes changing the properties of the water into a powerful oxidizing agent exhibiting antimicrobial properties. **Pathonex** is produced at a near neutral 5.5 pH where the predominant antimicrobial agent is hypochlorous acid, an efficient and efficacious specie of chlorine. Hypochlorous acid kills bacteria*.

The properties of **Pathonex** can be precisely controlled by manipulating power to the electrolytic cell, and flow rate through the cell. **Pathonex** can be applied as a liquid or spray. **Pathonex** freezes at 32° F and boils at 212° F. The anolyte is a colorless, aqueous solution, with a slight chlorine or ozone odor. After production, **Pathonex** must be stored in a closed, plastic container in a cool, dark area away from direct sunlight. The **Pathonex** product must be used within 30 days of production.

Additional Use Sites:

- + Business[es]
- + Bar[s]
- + Cafeteria[s]
- + Coffee shop[s]
- + Commercial building[s]
- + Convenience stores
- + Food processing facility (facilities)
- + Produce area[s]
- + Seafood warehousing - and/or - fisheries
- + Food service facility [facilities]
- + Food serving areas
- + Food cart[s] -or- food truck[s]
- + Fast food restaurant[s]
- + Shop[s]
- + Restaurant[s], bar[s]
- + Beverage and brewery [breweries]
- + Delicatessen[s]
- + Supermarket[s]
- + Grocery store[s]
- + Cooperative market[s] - or - Co-op[s]
- + Mini-mart[s]
- + Convenience mart[s]
- + Liquor store[s]
- + Warehouse club[s]
- + Institution[al] [facilities]
- + Food preparation area[s]
- + Catering facility [facilities]
- + [Commercial][institutional] kitchen[s] - and/or - kitchenette[s]
- + Commissary [Commissaries]
- + Banquet hall[s]
- + Dining area[s]
- + Hotel[s]
- + Motel[s]
- + Resort[s]
- + Hostel[s]
- + Bed & breakfast[s]
- + Casino[s]
- + Hospitality
- + Condo[s]
- + Vacation home[s]
- + Apartment[s]
- + Dorm[s]
- + Dormitory [dormitories]
- + Lodging establishment[s]
- + Household[s]
- + Home[s]
- + Mobile home[s]
- + Motor home[s]
- + Camper[s]
- + Reception area[s]
- + Office[s] [buildings]
- + Trans-warehousing
- + Warehouse[s]
- + Distribution center[s]
- + Shipping facility [facilities]
- + School[s]
- + Pre-school[s]
- + Elementary [school[s]]
- + Middle [school[s]]
- + High [school[s]]
- + Preparatory [school[s]]
- + Alternative [school[s]]
- + College[s]
- + Vocational school[s]
- + University [universities]
- + Arena[s], sports stadium[s]
- + Athletic facility [facilities]
- + Health club[s]
- + Recreation[al] center[s]
- + Bowling alley[s]
- + Public recreational facility [facilities]
- + Amusement park[s], theme park[s]
- + Movie theatre[s]
- + Bowling alley[s]
- + Campground[s]
- + Club[s]
- + [Exterior] surfaces of fountain[s]
- + Convocation center[s]
- + Airport[s]
- + Church [facility] [facilities]
- + Food pantry [pantries]

Additional Use Sites (continued):

- + Government [facility] [facilities]
- + Police station[s]
- + Fire station[s]
- + Library [libraries]
- + Customs facilities
- + Immigration[s] facility [facilities]
- + Military installation[s] - and/or - accommodation[s]
- + Correctional facility [facilities]
- + Prison[s]
- + Child care center[s]
- + Day-care center[s]
- + Mall[s]
- + Shopping center[s]
- + Wholesale outlet[s]
- + General merchandise store[s]
- + Pet store[s]
- + Cruise ship[s] - or - ship[s] - and/or - boat[s] - and/or - yacht[s]
- + Airplane[s] - and/or - airport[s]
- + Transportation terminal[s] - and/or - transportation vehicle[s]
- + Transport container[s]
- + [Parcel] transport vehicle[s]- and/or - semi-trailer[s]
- + Park[s] - and/or - park facility [facilities]
- + Truck stop[s]
- + Rest area[s]
- + Shelter[s]
- + Trailer[s] - and/or - camper[s]
- + Humane shelter[s] - or - animal shelter[s]
- + Pet care facility [facilities] - or - grooming facility [facilities] - or - kennel[s]
- + Veterinary facility [facilities]
- + Zoo[s] -and/or - animal sanctuary [sanctuaries]
- + [Animal] transport[ation] vehicle[s]
- + Storage facility [facilities] - and/or - storage area[s]
- + Recycling center[s]

Use Surfaces (Hard, Non-Porous Food-Contact):

- + Animal Equipment – and/or – animal cages – and/or - feed racks
- + Kitchen appliance exterior surface[s]
- + booster seat[s]
- + Crib[s]
- + Desk[s]
- + Dish[es]
- + Dish rack[s]
- + Doorknob[s]
- + Drain board[s]
- + Faucet[s]
- + Floor[s]
- + Food cart[s] - and/or - food truck[s]
- + Food case [exterior]
- + Food tray[s]
- + Freezer [surface[s]]
- + Garbage can[s] - and/or - trash can[s]
- + Glass - and/or - mirror[s]
- + Grocery [store] cart[s] - and/or - supermarket cart[s]
- + hand [soap] dispenser[s]
- + Hand rail[s]
- + Hard [non-porous] surface[s]
- + high chair[s]
- + Cabinet[s]
- + Chiller
- + Counter[s], countertop[s]
- + Vanity [vanities], vanity top[s]
- + High touch surface[s] [points]
- + Kitchen Hood[s]
- + Microwave [surface[s]]
- + Oven [surface[s]]
- + Pot[s] -and/or- pan[s] -and/or- ware
- + Reception counters [- or - areas]
- + Refrigerator [surface[s]]
- + Shelve[s], Shelving
- + Sink[s]
- + Table[s]
- + Tile
- + Towel dispenser[s]
- + Salad bar splash [- or - sneeze] guard[s]
- + Storage container[s]
- + Utensil[s]
- + Warewasher[s] -and/or - warewash machine[s] - and/or - dishwasher[s] - and/or - dish machine[s]
- + [washable] chair[s]
- + [water] [drinking] fountain[s]

Surface Materials:

- + ABS [Acrylonitrile butadiene styrene]
[plastic]
- + Aluminum
- + Baked enamel
- + [Brushed] [polished] nickel
- + [Brushed] bronze
- + Chrome
- + Common hard, non-porous household
Formica
- + Glass
- + Glazed ceramic tile
- + Glazed porcelain
- + Glazed porcelain enamel
- + Granite
- + Hard, non-porous food-contact surface[s]
- + Laminated surface[s]
- + Linoleum
- + Marble
- + Melamine
- + Mirror
- + Painted surface[s]
- + Plastic laminate[s]
- + [Polished] chrome
- + Polyacrylic
- + Polycarbonate
- + Polyethylene
- + Sealed granite
- + Similar hard, non-porous surfaces except
those excluded by the label
- + Stainless steel
- + Synthetic marble
- + Vinyl tile

Optional Marketing Language/Additional Claims:

- + Produced by the electrolysis of salt [NaCl] and water [H₂O]
- + Cost effective food contact surface sanitizer
- + [Effectively] Kills Staphylococcus Aureus –and/or-Salmonella Enterica
- + Proven to sanitize at 181 ppm Hypochlorous acid
- + Pathonex is a clear, liquid with a slight chlorine smell.
- + Freezing point: <32F
- + Boiling point: >212F
- + pH is between 4.5-6 [which is the optimal range for [Hypochlorous Acid] stability]
- + Hypochlorous [acid] is a strong oxidizing agent with antimicrobial activity
- + Ready-to-use. No dilution required.
- + Non-irritating/Non-corrosive to eyes [skin]
- + Can be stored up to 30 days and still sanitize, best if used immediately
- + Category IV classification. No signal word or personal protective equipment required
- + Ready to use
- + Environmentally Responsible
- + [Effectively] Kills - and/or - eliminates[s] - and/or - sanitize[s] - and/or - destroys Staphylococcus Aureus [Staph]
- + [Effectively] Kills - and/or - eliminates[s] - and/or - sanitize[s] - and/or - destroys Salmonella Enterica [Salmonella]
- + Effective against Staphylococcus Aureus [Staph]
- + Effective against Salmonella Enterica [Salmonella]
- + Hypochlorous [acid] is a strong oxidizing agent
- + Ready-to-use - and/or - [No dilution required]
- + Non-irritating [-and/or - Non-corrosive] to eyes [skin]
- + [Can be] store[d] up to 30 days [and still sanitize] [, best if used immediately]
- + Category IV classification
- + No [signal word or] personal protective equipment [PPE] required
- + Ready to use
- + Environmentally Responsible
- + Sanitize[s] hard, non-porous, food-contact surfaces in food preparation [prep] areas
- + Sanitize[s] hard, non-porous, food-contact surfaces [in areas] where food may go
- + Meets AOAC efficacy standards for food-contact surface sanitizer
- + [A] hypochlorous acid solution
- + Sanitizes at 181 ppm [FAC]
- + Easily sanitize[s]
- + Sanitizes hard, non-porous, food-contact surfaces
- + Leaves hard, non-porous, food-contact surfaces sanitized
- + Easily Sanitizes [surfaces]

- + Daily sanitizing of hard, non-porous, food-contact surfaces
- + User safe [ppm] level [concentration]
- + Affordable
- + Easy to use
- + Convenient
- + Simple
- + Economical
- + Affordable
- + Consistent
- + Highly effective
- + Hard, non-porous, food-contact sanitizer
- + [Can] reduce the risk of cross-contamination on treated, hard, non-porous food-contact surfaces
- + Bacteria-fighting
- + Bactericide -or- Bactericidal
- + Deodorizes by killing bacteria
- + Removes -or- eliminates odors [at the source] [by killing bacteria]
- + [Ideal] for use in kitchens [and public areas]
- + Non-irritating to [skin and eyes]
- + Eliminates [urine] odor
- + Eliminates odors caused by [bacteria]
- + Leaves [surfaces] sanitary
- + No PPE [Personal Protective Equipment] required
- + No rinsing necessary
- + Removes -or- eliminates odors [at the source]
- + Leaves no chemical residue
- + No chemical residue left behind
- + No mixing [necessary]
- + No complicated dilution process[es]
- + Will not leave grit or soap scum
- + Removes hard water buildup [- or- deposit]
- + Effective against odor causing bacteria
- + [This product] leaves surfaces sanitized
- + [This product] [Contains] no VOC [Volatile Organic Compounds]; [This product is] VOC [Volatile Organic Compounds] free
- + [This product] [Contains] no NPEs [Nonylphenol ethoxylates]; Nonylphenol ethoxylate [NPE] free
- + [This product is] Phosphate free; Phosphate free
- + [This product is] Ammonia free; Ammonia free

- + [This product is] Alcohol free; Alcohol free
- + [This product is] Phosphorous free; Phosphorous free
- + [This product] [contains] no phthalates; [This product is] phthalate free;
- + [This product] [contains] no perchloroethylene; [This product is] perchloroethylene free
- + [This product] [contains] no triclosan; [This product is] triclosan free
- + [This product] [contains] no 2-butoxyethanol; [This product is] free of 2-butoxyethanol
- + [This product] [contains] no surfactants; [This product is] surfactant free
- + [This product] [contains] no chelating agents; [This product is] free of chelating-agents
- + [This product] [contains] no buffers; [This product is] free of buffers
- + [This product] [contains] no builders; [This product is] free of builders
- + [This product] [contains] no foaming agents; [This product is] free of foaming agents
- + [This product] [contains] no anti-foaming agents; [This product is] free of anti-foaming agents
- + [This product] [contains] no perfumes; [This product is] perfume free
- + [This product] [contains] no colorants [dyes]; [This product is] free of colorants [dyes]
- + [This product] [contains] no additives; [This product is] additive-free
- + [This product] rapidly breaks down after use
- + [This product is] not harmful to septic [and waste water treatment] systems
- + Refillable container
- + Increases sustainability
- + Drain [and disposal] friendly
- + Generated from salt [NaCl], water [H₂O] and [&] electricity
- + Electro-Chemically activated solution [ECAS]
- + [This product is a] electrolytically generated sanitizer
- + Brine does not enter [the] [electrolytic] cell
- + [Patented] [technology where] salt [NaCl] does not enter the [electrolytic] cell and therefore [is] not added to [the] output solution[s]
- + [Generated using] [Pathosans] patented [electrolytic] cell technology
- + [This product is] [generated using] [Pathosans] patented [electrolytic] cell technology keeps [-or- keeping] the brine separate[d] from the [product] output solution.
- + [For] daily use
- + [For use on] high touch surfaces
- + For use in [insert one or more of the sites listed on the label]
- + For use on [insert one or more of the surfaces listed on the label]
- + For sanitizing [insert one or more of the surfaces listed on the label]