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



** EPA United States Environmental Protection Office of Pesticide Programs Office of Pesticide Programs

Ecolab, Inc. 370 N. Wabasha Street St. Paul, MN 55102

MAR 02 2010

Attention: Rhonda K. Schulz, Associate Director

Product Registration and Compliance

Subject: Advacare 120 Sanitizer/Sour EPA Registration No. 1677-193

Your Amendment Dated October 23, 2009

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, to add efficacy claims, additional brand name and to revise the precautionary language, is acceptable, provided that you:

- 1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3©(5) and sec. 4 when the Agency requires all registrants of similar products to submit such data.
 - 2. The submitted efficacy study (MRID No. 478975-01 thru 478975-02) supports the use of the product, as a laundry additive for disinfecting laundry during commercialindustrial-institutional laundry operations in the presence of 500 ppm hard water for a 5-minute contact time. Refer to enclosed copy of the Efficacy review under "CONCLUSIONS" for a listing of the acceptable microorganisms.
 - 3. The submitted efficacy study (MRID No. 478975-02) do not support the use of the product, as a laundry additive for disinfecting laundry during commercial-industrialinstitutional laundry operations against Enterococcus faecium VRE in the presence of 500 ppm hard water for a 5-minute contact time. Refer to enclosed copy of the Efficacy review under "CONCLUSIONS" for further comments.
 - 4. The proposed label claims that the product is an effective laundry additive for disinfectant laundry in commercial-industrial-institutional laundry operations in the presence of 500 ppm hard water for a 5-minue contact time. Refer to the enclosed copy of the efficacy review under "CONCLUSIONS" for acceptable microorganisms.

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- 5. The following revisions to the proposed label must be made:
 - Under the "Environmental Hazards" section of the proposed label, change "or public waters" to read "or other waters".
 - Under the "to Disinfect and Bleach" section of the proposed label, change "sanitize a maximum" to read "disinfect a maximum". This change should be made in two places.
 - Under the "Container Disposal" section of the proposed label, identify disposal options for the container.
- 6. Submit two (2) copies of final printed labeling before you release the product for shipment.
- 7. The additional brand name "Advacare Disinfectant" is acceptable.

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.

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)

Enclosures

AdvaCare 120 Sanitizer/Sour

LAUNDRY SANITIZER/SOUR

Active Ingredients:		EPA Letter Dated:
Peroxyacetic acid	15.2%	1447)
Hydrogen peroxide	11.2%	MAR - 2 2010
Inert Ingredients		
Total	100.0%	Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide,

KEEP OUT OF REACH OF CHILDREd stered under EPA Reg. No. 1677-193

DANGER

ACCEPTED

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CORROSIVE: Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed. Do not breathe vapor or mist. Wear protective eyewear (goggles, face shield, or safety glasses.) protective clothing, and rubber gloves when handling. Wash clothing thoroughly after handling with soap and water, and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse. Wear a mask or pesticide respirator jointly approved by Mine Safety and Health Administration and the National Institute for Occupational Safety and Health.

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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 -20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

FOR EMERGENCY MEDICAL INFORMATION CALL TOLL FREE: 1-800-328-0026 Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

PHYSICAL AND CHEMICAL HAZARDS:

Strong oxidizing agent. Corrosive. Do not use in concentrate foam. Mix only with water according to the label instructions. Never bring concentrate in contact with other sanitizers, cleaners, or or ganic substances.

ENVIRONMENTAL HAZARDS: Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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FOR COMMERCIAL OR INSTITUTIONAL USE ONLY
STRONG OXIDIZING AGENT
DO NOT MIX WITH ANYTHING BUT WATER
VENTED CONTAINER: STORE UPRIGHT IN A COOL PLACE, TIGHTLY CAPPED.

For Sanitization and Souring of Laundry U.S. Patent # 6,262,013.

AdvaCare 120 Sanitizer/Sour is a concentrate formulation designed for use in commercial, Institutional and Industrial laundry operations. When added as a combined souring/sanitizing agent at the rate of 3 ounces per 100 pounds of dry laundry, this formulation provides sanitization against Staphylococcus aureus, Klebsiella pneumoniae, Pseudomonas aeruginosa, and methicillin-resistant Staphylococcus aureus (MRSA).

DIRECTIONS FOR USE

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

To Sanitize and Bleach

Using the appropriate Ecolab dispenser, inject AdvaCare 120 Sanitizer/Sour as a sour and sanitizer into the bleach or sanitizing rinse step. AdvaCare 120 Sanitizer/Sour is effective in rinse water up to 500 ppm of water hardness (up to 29 grains per gallon). Use AdvaCare 120 Sanitizer/Sour at a rate of 3 ounces per maximum 60 gallons of rinse water to sanitize a maximum of 100 pounds dry laundry (at a rate of 90 mL per maximum 227 L of rinse water to sanitize a maximum of 45 kg dry laundry). Treat the laundry for a minimum of 5 minutes at 90°F to 160 140°F (32 °C to 71 60 °C). Softener can subsequently be added after the 5 minute sanitizing step. Following the sanitizing step, the laundry may be rinsed with water that may include starch, softener, odor neutralizer, fragrance, soil release agent, sour and/or fluid repellent. For further bleaching action, an additional dose of product up to 17 oz/cwt may be added in the bleach or rinse step at a temperature of 90°F to 160 °F (32 °C to 71 °C). Use level, time and temperature will vary depending on stain level, fabric type and load weight.

To Bleach Only

Advacare 120 Sanitizer/Sour can be used for bleaching of linen. To bleach, dose up to 20 oz/cwt of Advacare 120 Sanitizer/Sour in the appropriate bleaching step at a temperature of 90 -160 °F (32-71 °C). Use levels, time and temperature will vary depending on the type of soil, fabric, and load. For best results, please consult your Ecolab Laundry Specialist. Following the bleach/sanitizing step, the laundry may be rinsed with water which may include: sour, starch, softener, odor neutralizer, fragrance, soil release agents, and/or fluid repellents.

STORAGE & DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL
PESTICIDE STORAGE: Product should be kept cool and in vented container to avoid any explosion hazard.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a 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 nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

(< 55-gallons rigid) Nonrefillable container. De le General Partition of the container. Offer recycling, if available. Triple rinse container (or equivalent) for the container. Offer recycling, if available. Triple rinse container (or equivalent) for the container. Offer recycling, if available. Triple rinse container (or equivalent) for the container. Offer recycling, if available. Triple rinse container (or equivalent) for the container. Offer recycling, if available. Triple rinse container (or equivalent) for the container. Offer recycling, if available. Triple rinse container (or equivalent) for the container. Offer recycling, if available. Triple rinse container (or equivalent) for the container. Offer recycling, if available. Triple rinse container (or equivalent) for the container of the

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-193 ŗ

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Net Contents:

4 U.S. Gals. (15.1 liters)

12 U.S. Gals (45.3 liters) 50 U.S. Gals. (189 liters) 300 U.S. Gals (1136 liters)

EPA Reg No. 1677-193

EPA Est. 60156-IL-1, 1677-MN-1 (P), 60156-IL-1 (SI), 1677-CA-2(R), 1677-TX-1(D), 1677-OH-1(H), 1677-IL-1(J), 1677-GA-1(M), 1677-PR-1(B), 1677-CA-1(S), 1677-NJ-1(W), 1677-WV-1(V) Superscript refers to first letter of date code

Ecolab Inc. 370 North Wabasha Street St. Paul, MN 55102

ACCEPTED with COMMENTS EPA Letter Dated:

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1677-193