



1 Ecolab Place  
St. Paul, MN 55102

**DATE:** October 28, 2019  
**TO:** Food Code Inspectors, Division of Food Safety and Environmental Health  
**SUBJECT:** EPA Registration of S&S Sanitizer

Ecolab is commercializing a new product, S&S Sanitizer. This product is designed for use as a third-sink sanitizer, as well as for cleaning and sanitizing hard, non-porous food-contact surfaces in a variety of applications in foodservice environments. The purpose of this letter is to inform you of this new technology and address some frequently asked questions.

S&S Sanitizer is registered as a cleaner and sanitizer for use on hard, non-porous food-contact surfaces under EPA Registration No. 1677-260<sup>1</sup>. The product has an EPA stamped and approved master label, and all product claims are registered with the EPA. When S&S Sanitizer is used as directed at the use concentration for food contact sanitizing, it will also kill Norovirus in 30 seconds with no rinse required. Please review the product label for complete claims and use directions. The EPA Pesticide Product Label System contains the most current version of the stamped-accepted master label at the following link:

[https://ofmpub.epa.gov/apex/pesticides/f?p=PPLS:8:11996045307940::NO::P8\\_PUID,P8\\_RINUM:529214,1677-260](https://ofmpub.epa.gov/apex/pesticides/f?p=PPLS:8:11996045307940::NO::P8_PUID,P8_RINUM:529214,1677-260)

All ingredients in S&S Sanitizer have been reviewed by the EPA and have been cleared under 40 CFR 180.940(a) for use in food-contact surface sanitizing solutions and are considered approved for use on food-contact surfaces. S&S Sanitizer is compliant with 2017 US Food Code sections 4-501.114, 4-501.115, 4-603.16 and 7-204.11, and is acceptable for use as directed on the product label.

In order to test for the proper amount of active chemical in a use solution, test strips should be used. **S&S Sanitizer test strips must be used for this test**; standard quat test strips should not be used and will not work. Instructions for testing are available at the point of use.

Please contact your Ecolab representative or 1-800-35-CLEAN for further information.

Keith Coleman  
Senior Marketing Manager  
[keith.coleman@ecolab.com](mailto:keith.coleman@ecolab.com)

Jill Schomers  
Senior Chemical Engineer  
[jill.schomers@ecolab.com](mailto:jill.schomers@ecolab.com)

<sup>1</sup> State registrations are currently pending for Georgia, Illinois, Maryland, and Michigan.

## **SMARTPOWER™ SINK & SURFACE CLEANER SANITIZER**

### **FREQUENTLY ASKED QUESTIONS**

#### **What is SMARTPOWER Sink & Surface Cleaner Sanitizer?**

SMARTPOWER Sink & Surface Cleaner Sanitizer is designed for use as a third-sink sanitizer as well as for cleaning and sanitizing hard, non-porous food-contact surfaces in a variety of applications in foodservice environments. SMARTPOWER Sink & Surface Cleaner Sanitizer is registered as a cleaner and sanitizer for use on hard, non-porous food-contact surfaces under EPA Registration Number 1677-260. The product has an EPA stamped and approved master label, and all product claims are registered with the EPA. The master label can be found on the EPA's website at the following address:

[https://ofmpub.epa.gov/apex/pesticides/f?p=PPLS:8:13204421290663::NO::P8\\_PUID,P8\\_RINUM:529214,1677-260](https://ofmpub.epa.gov/apex/pesticides/f?p=PPLS:8:13204421290663::NO::P8_PUID,P8_RINUM:529214,1677-260)

#### **What are the active ingredients?**

Dodecylbenzenesulfonic Acid (DDBSA, 272 – 700 ppm) and Lactic Acid (704 – 1875 ppm)

#### **Are the ingredients approved for food-contact sanitizing?**

Yes, all ingredients in SMARTPOWER Sink & Surface Cleaner Sanitizer have been reviewed by the EPA and have been cleared under 40 CFR 180.940(a) for use in food-contact surface sanitizing solutions and are approved for use on food-contact surfaces. SMARTPOWER Sink & Surface Cleaner Sanitizer is compliant with 2017 US Food Code sections 4-501.114, 4-501.115, 4-603.16 and 7-204.11 and is acceptable for use as directed on the product label.

#### **Does this product have an Emerging Pathogens claim?**

Yes, SMARTPOWER Sink & Surface Cleaner Sanitizer has an Emerging Pathogens claim. SMARTPOWER Sink & Surface Cleaner Sanitizer has demonstrated effectiveness against viruses similar to 2019 Novel Coronavirus on hard, non-porous surfaces. Therefore, SMARTPOWER Sink & Surface Cleaner Sanitizer can be used against 2019 Novel Coronavirus when used in accordance with the directions for use against Norovirus on hard, non-porous surfaces. Refer to the CDC website at <https://wwwnc.cdc.gov/travel/notices/alert/novel-coronavirus-china> for additional information.

#### **Can I use SMARTPOWER SINK & SURFACE CLEANER SANITIZER to replace a 1<sup>st</sup> sink detergent?**

No, SMARTPOWER Sink & Surface Cleaner Sanitizer is not designed for use as a detergent in a 3-compartment sink. It is designed for use on light to medium foodservice soils and is not intended to be used as a replacement for heavy duty degreasers or manual pot and pan detergents.

### Can I use SMARTPOWER SINK & SURFACE CLEANER SANITIZER to replace a 3<sup>rd</sup> sink sanitizer?

Yes, SMARTPOWER Sink & Surface Cleaner Sanitizer is designed for use as a sanitizer in a 3-compartment sink.

### What organisms is SMARTPOWER Sink & Surface Cleaner Sanitizer effective against for food-contact sanitizing?

When used as directed for food-contact sanitizing, SMARTPOWER Sink & Surface Cleaner Sanitizer will kill norovirus on food utensils, food serving equipment, dishes, glasses, silverware, and hard, non-porous surfaces. It is also effective against:

Food Contact Surface Sanitizing (Contact Time: 1 minute)		
Use Concentration: 0.27 – 0.55 fl. oz/gal	Active Ingredients	
	ppm DDBSA**	ppm Lactic Acid
	272 - 700	704 - 1875
Bacteria	ATCC Strain	Contact Time
<i>Staphylococcus aureus</i>	ATCC 6538	(1 minute)
<i>Escherichia coli</i>	ATCC 11229	(1 minute)
<i>Salmonella enterica</i>	ATCC 10708	(1 minute)
<i>Escherichia coli</i> O157:H7	ATCC 35150	(1 minute)
<i>Listeria monocytogenes</i>	ATCC 19117	(1 minute)
<i>Campylobacter jejuni</i>	ATCC 33291	(1 minute)
<i>Shigella flexneri</i>	ATCC 29508	(1 minute)
<i>Shigella sonnei</i>	ATCC 11080	(1 minute)
<i>Yersinia enterocolitica</i>	ATCC 23715	(1 minute)
<i>Cronobacter sakazakii</i>	ATCC 12868	(1 minute)
<i>Staphylococcus aureus</i> Community acquired Methicillin Resistant (MRSA)	ATCC BAA-1083	(1 minute)
Non-Food Contact Surface Sanitizing (Contact Time: 5 minutes)		
Use Concentration: 0.27 – 0.55 fl. oz/gal	Active Ingredients	
	ppm DDBSA**	ppm Lactic Acid
	272 - 700	704 - 1875
Bacteria	ATCC Strain	Contact Time
<i>Staphylococcus aureus</i>	ATCC 6538	(5 minutes)
<i>Enterobacter aerogenes</i>	ATCC 13048	(5 minutes)
TO KILL NOROVIRUS on (Food) (and) (Non-Food) Contact Surfaces (Contact Time: 30 seconds)		
(Use Concentration: 0.27 – 0.55 fl. oz/gal)	Active Ingredients	
	ppm DDBSA**	ppm Lactic Acid
	272 - 700	704 - 1875
Virus*	ATCC Strain	Contact Time
*Norovirus (Feline calicivirus surrogate)	ATCC VR-782, Strain F-9	(30 seconds)
**Dodecylbenzenesulfonic Acid		

### **At what concentration should I use SMARTPOWER Sink & Surface Cleaner Sanitizer to clean and sanitize hard non-porous food-contact surfaces?**

Testing solution should be between 0.27 – 0.55 oz/gal (corresponds to: 272 – 700 ppm DDBSA† and 704 – 1875 ppm Lactic Acid)

### **At what concentration should I use SMARTPOWER Sink & Surface Cleaner Sanitizer to sanitize food utensils, food serving equipment, dishes, glasses, bar glasses, and silverware in a two- or three-compartment sink?**

Testing solution should be between 0.27 – 0.55 oz/gal (corresponds to: 272 – 700 ppm DDBSA† and 704 – 1875 ppm Lactic Acid)

### **How do I know my solution is at the right concentration?**

SMARTPOWER Sink & Surface Cleaner Sanitizer has a dual-active system. This means that there are two active ingredients that are tested with one test strip. When the solution is in spec, both actives are in the correct range. In order to test for the proper amount of active chemical in a use solution, Sink & Surface Cleaner Sanitizer test strips should be used. These test strips are available through Ecolab Food Safety Solutions (FSS). Reference the wall chart for more information.

### **Can I use quat test strips?**

No, quat test strips (QT40 / QT10) should **not** be used and will **not** work.

### **What temperature can SMARTPOWER Sink & Surface Cleaner Sanitizer be tested at?**

Food code requires sanitizer to be 75 – 120 degrees Fahrenheit. SMARTPOWER Sink & Surface Cleaner Sanitizer can be tested at any temperature.

### **Is there information available for health departments?**

Yes, all information for health departments is available via a QR code on the wall charts.

### **How often do I need to replace the use solution?**

- For the 3<sup>rd</sup> sink sanitizer: replace when use solution becomes visibly dirty, when solution tests below food-contact sanitizing concentration range, or every 4 hours.
- For the red sanitizer pails: replace when use solution becomes visibly dirty, when solution tests below food-contact sanitizing concentration range, or every 4 hours.
- For the spray bottles: replace after one week.

### **Is this a solid or liquid product?**

SMARTPOWER Sink & Surface Cleaner Sanitizer is a liquid.

### **Is cleaning still required before sanitizing?**

Yes, soils still need to be removed to allow SMARTPOWER Sink & Surface Cleaner Sanitizer to come in contact with hard non-porous surfaces. This requires two-steps with one product. To ensure proper cleaning and sanitizing procedures, follow application-specific instructions from training materials. For hard surfaces, one side of a towel or a wipe should be used to clean and the other side of the towel or wipe should be used to sanitize.

**Can SMARTPOWER SINK & SURFACE CLEANER SANITIZER also be used in combination with a cleaner (traditional wash, rinse, sanitize process)?**

Yes, a separate cleaner can be used in combination with SMARTPOWER Sink & Surface Cleaner Sanitizer, if desired.

**Can I use SMARTPOWER SINK & SURFACE CLEANER SANITIZER to replace a food-contact surface sanitizer?**

Yes, SMARTPOWER Sink & Surface Cleaner Sanitizer is designed for cleaning and sanitizing hard, non-porous food-contact surfaces in a variety of applications in foodservice environments including, but not limited to, countertops, tabletops, eating utensils, kitchen equipment, and buffet counters.

**Can I use SMARTPOWER SINK & SURFACE CLEANER SANITIZER to replace a general-purpose cleaner?**

Yes, SMARTPOWER Sink & Surface Cleaner Sanitizer can be used as a cleaner to remove soils from a variety of surfaces. However, for heavy soils or for streak-free glass cleaning, a separate cleaner may be required.

**Can I use SMARTPOWER SINK & SURFACE CLEANER SANITIZER to replace a restroom cleaner?**

No, SMARTPOWER Sink & Surface Cleaner Sanitizer is not designed for use as a bathroom cleaner.

**Is there a recommended towel for the solution?**

Unlike quat sanitizers, SMARTPOWER Sink & Surface Cleaner Sanitizer solution will not absorb unevenly into towels. Therefore, you can use towels of any material.

**Will terry cloth towels bind the active ingredient?**

No, SMARTPOWER Sink & Surface Cleaner Sanitizer has been tested with terry cloth and the active ingredients are not bound. They are readily released from the cloth.

**What PPE are required?**

When used as directed, the use solution requires no personal protective equipment.

## VISUAL COMPLIANCE SYSTEM (BUCKETS) FREQUENTLY ASKED QUESTIONS

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### What is the visual compliance system?

This new visual compliance system is an innovative bucket designed with a built-in window that holds a unique test strip to visually indicate when the sanitizing solution is in compliance. SMARTPOWER Sink & Surface Cleaner Sanitizer paired with the visual compliance system helps protect your reputation and customers.

### How does it work?

- **Step 1:** Insert a new test strip into the sleeve in the bucket.
- **Step 2:** Fill the bucket with SMARTPOWER Sink & Surface Cleaner Sanitizer.
- **Step 3:** When the product begins to go out of compliance, the test strip will turn pink and a caution symbol will appear to indicate when it's time to change the solution.
- **Step 4:** Empty bucket and remove test strip from sleeve in bucket.
- **Step 5:** Replace test strip and dispense fresh solution into bucket.

### How do I use the test strip to determine if my use solution is out of compliance?

The tests strips are designed to be dark blue when the solution is within the acceptable use range. When the product begins to go out of spec, the test strip will turn light purple/pink and a blue caution symbol will appear.

### How long will a test strip last?

The test strips should be changed out every time the solution in the bucket is changed out. The food code requires a new solution to be prepared every 4 hours, so we recommend changing the strip at the same time.

### Can I reuse the test strip for multiple solutions?

We recommend changing the test strip every time you change the SMARTPOWER Sink & Surface Cleaner Sanitizer solution.

### Can I use the bucket and test strips to test the compliance of other sanitizer solutions?

No, the tests strips are designed exclusively for use with SMARTPOWER Sink & Surface Cleaner Sanitizer and would not give accurate information with other products.

### Can the pail go through the dishwasher?

Yes. The SMARTPOWER Sink & Surface Cleaner Sanitizer Pail can be cared for in the same way other red and green cleaner/sanitizer pails are cared for.

### Is there a shelf-life for the pail test strips? How long do they last?

The strips are replaced every time the solution is changed (e.g., once per shift or once per day). The shelf life for the pail test strips is one year.

### Can I use the bucket and test strips to test the compliance of other sanitizer solutions?

No, the tests strips are designed exclusively for use with SMARTPOWER Sink & Surface Cleaner Sanitizer and would not give accurate information with other products.

## **MAKE YOUR OWN WIPES SYSTEM**

### **FREQUENTLY ASKED QUESTIONS**

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#### **How do I use a disposable wipes system with SMARTPOWER Sink & Surface Cleaner Sanitizer?**

Follow these dry wipe preparation instructions to use wipes with SMARTPOWER Sink & Surface Cleaner Sanitizer:

- **Step 1:** Place roll of disposable wipes in canister.
- **Step 2:** Pour 32oz of use dilution SMARTPOWER Sink & Surface Cleaner Sanitizer over wipes in a circular pattern. Allow wipes to soak for **5 minutes** before use.
- **Step 3:** Pull wipe through lid. Place lid on canister and pull first wipe through. (Wipes should be damp, but not dripping.)
- **Step 4:** Use one side to clean and the other side to sanitize.
- **Step 5:** Replace wipe when wipe is dry.

#### **If I'm using SMARTPOWER Sink & Surface Cleaner Sanitizer with a disposable wipes system can I still use it as a cleaner and sanitizer?**

Yes, one disposable wipe can be used to clean and sanitize a table using the following method:

- **Step 1:** Remove a wipe from the canister and clean the table surface using one side of the wipe.
- **Step 2:** Flip the wipe over or fold it in half.
- **Step 3:** Use the flipped or folded wipe to sanitize the clean table.

#### **How can the wipes be tested to ensure they are in the correct concentration range?**

Remove a wipe and squeeze/express the solution into a container and use the Sink & Surface Cleaner Sanitizer test strip to check concentration. More detailed instructions on the correct concentrations are on the SMARTPOWER Sink & Surface Cleaner Sanitizer wall chart. There is a separate wall chart for wipes with instructions depending on if the facility is using wipes.

#### **Can replacement canisters and wipes be ordered?**

Yes, replacement canisters and wipes are available through Institutional orders:

- 56-ct canister – 6 canisters per case: 600246
- 56-ct wipes – 12 rolls of 56-count wipes per case: 600248