



February 1, 2008

To Whom it May Concern:

This will help explain the E2 and E3, Former USDA, Now NSF Ratings for Handwashing and Hand Sanitizing Non Food Compounds.

E2

An E2 compound is used for Handwashing and Sanitizing. The hands need not be washed prior to the use of the E2 compounds. However; after the use of the compounds, the hands must be thoroughly rinsed with potable water. The first part of the process is using an E2 rated cleaner that both cleans and sanitizes the hands. The second step of the process is to make sure there is water nearby so the hands can be **RINSED AFTER** using the hand cleaning compounds.

E3

The E3 process is also a two step process. To complete an E3 rated hand sanitizing process the hands must be thoroughly **WASHED and RINSED BEFORE** using an E3 rated Hand Sanitizer. Using an E3 rated compound by itself will kill most of the bacteria on your hands but to be compliant with the E3 process there must be accessible soap and water to thoroughly wash and rinse the hands **BEFORE** using the E3 rated hand sanitizer.

Kutol has both E2 and E3 hand cleaners and sanitizers. To be in true compliance with the USDA the cleaners and sanitizers **MUST** be used in addition to the washing and rinsing as described above. Attached is a list of the Kutol products that have E2 and E3 ratings. Also attached are the letters from the FDA confirming the ratings on these products.

In Summary keep in mind it is important to use the correct compounds to be in compliance with these ratings **AND** it is also important to do the proper washing and rinsing as described above to be in compliance with the FDA

Let me know if you have further questions on this matter.

Sincerely,
KUTOL PRODUCTS

A handwritten signature in cursive script that reads 'Bob Bernet'.

Bob Bernet
Vice President, Sales

5.6.2 Handwashing and sanitizing products (Category Code E2)

Combination detergents-germicides (single step preparations designed to combine hand washing and sanitizing) will be considered for Registration on the basis of their ability to effectively clean the hands as well as their germicidal equivalency to 50 ppm available chlorine. The hands need not be washed with soap or detergent prior to use of such preparations. However, the hands must be rinsed with potable water after the use of the product and before handling food. Products shall be accepted for use in food handling by the U.S. Food and Drug Administration (FDA) OTC Drug Compliance Branch, 5600 Fishers Lane, Rockville, MD 20857, phone: (301) 594-1065.

5.6.3 Hand sanitizing products (Category Code E3)

Products manufactured from those solutions described in CFR Title 21, Section 178.1010, which are applicable for the purpose may be used to sanitize the hands of employees handling food products without a subsequent rinse provided they are germicidally equivalent to 50 ppm available chlorine. Products shall not contain perfumes leaving a residual odor on hands after usage. These sanitizing solutions may be used only after thoroughly washing hands with soap or detergent and water, followed by rinsing with potable water. In many instances, these hand sanitizers may be injected directly into wash/rinse water. Other products shall be accepted for use in food handling by the U.S. Food and Drug Administration (FDA) OTC Drug Compliance Branch, 5600 Fishers Lane, Rockville, MD 20857, phone: (301) 594-1065.

5.6.4 Hand creams, lotions and powders (Category Code E4)

These products are intended to be used by employees at the end of the workday in bathrooms, dressing rooms and other nonprocessing areas. Labeling shall state that usage is intended for toilets, dressing rooms and nonprocessing areas only.

Powdered or abrasive hand cleaners may also fall into this category. Such cleaners may contain up to 90 percent sodium borate (borax), or other abrasive material, in combination with soaps or detergents and other adjuvants common to such preparations.

5.6.5 Ingredients for use in hand care products (Category Code EX)

Chemicals or mixtures may be reviewed for use as ingredients in hand care products. Due to the nature of some ingredients, they may not be acceptable for use in some types of products. NSF review and approval is based on the FDA approval. The limitations associated with the NSF Registered ingredient can be found within the NSF Registration letter. Formulations containing NSF Registered ingredients are not considered NSF Registered products. A separate application is required for each final product. Formulators using NSF Registered ingredients need only identify the trade name, NSF Registration number, and concentration within the finished product on the application form.

5.7 Pesticides

The following general requirements apply to all products listed under Category Codes F1, F2, F3, F4 and F5, unless specifically exempted:

- Products shall be registered by the EPA for use in food establishments and adequate documentation of that registration, including registered labels, shall be provided to NSF for review;
- Granular or powdered products shall be colored a distinct blue or green to distinguish the pesticide from edible substances, unless they are in labeled dispenser containers, or do not have the characteristics of food products (i.e. dry baits which are pressed into distinct cakes or pellets);

- Granular or powdered pesticides such as borax, boric acid, derris or cube root, silica aerogel, and sodium fluoride mixed with inert ingredients such as clay, sugar, or talc, may be acceptable for use for the control of flies, roaches, or other insects in inedible product areas or outside premises under circumstances which absolutely prevent contact with food products.

5.7.1 Nonresidual pesticides (Category Code F1)

Contact sprays, space sprays, aerosols, so-called "knockdown" sprays containing pesticides not having residual killing action may be acceptable for use. Nonresidual insecticides such as pyrethrins, pyrethrum extract, and synthetic pyrethroids, may be acceptable for use based on review by NSF. Synergists, such as piperonyl butoxide and n-octyl bicycloheptane dicarboximide (MGK 264), singly or in combination, may be acceptable for use with nonresidual insecticides.

5.7.2 Residual pesticides (Category Code F2)

These products are generally restricted to inedible product areas or outside premises where exposed food products are neither processed nor stored in open containers. They may be used in edible product areas for crack and crevice treatment provided applicable directions appear on the EPA registered label. Such use is acceptable provided the pesticide is applied after processing operations have ended, exposed food products and packaging materials are removed or protected, the treated area is ventilated and cleaned thoroughly before processing operations are resumed, and the treated cracks and crevices are sealed. Acceptable insecticides include:

- Acephate
- Diazinon
- Baygon
- Dichlorvos
- Chlorpyrifos
- Propetamphos
- Cyfluthrin
- Residual synthetics

5.7.3 Rodenticides (Category Code F3)

These products are typically not allowed to be placed in edible product areas until operations have ceased for the day and all uncovered products have been removed from the area. Rodenticides such as those listed below may be acceptable for use, based on review by NSF:

- 3-(alpha-Acetyl-furfuryl)-4-hydroxycoumarin (Fumarin)
- Brodifacoum
- Bromadiolone
- 2-Isovaleryl-1, 3-indandione (PMP, Valone)
- 2-Isovaleryl-1, 3-indandione, calcium salt
- 2-Pivalyl-1, 3-indandione (Pival)
- 2-Pivalyl-1, 3-indandione, sodium salt (Pivalyn)



Hand Hygiene Specialists

March 1, 2011

The following list of Kutol items has received the NSF rating of E2:

- #68341 Foaming E2 Bacteria Controlling Hand Sanitizer and Cleaner, 6/1000ml EZ Foam
- #68324 Foaming E2 Bacteria Controlling Hand Sanitizer and Cleaner, 6/1000ml EZ Foam
- #1782 HSC E2 Skin Cleaner/Sanitizer, 12/800ml cartridge
- #1709 HSC E2 Skin Cleaner/Sanitizer, 4/1 pour gallon
- #1707 HSC E2 Skin Cleaner/Sanitizer, 4/1 flat top gallon
- #1765 HSC E2 Skin Cleaner/Sanitizer, 12/800ml bag in a box
- #1767 HSC E2 Skin Cleaner/Sanitizer, 4/2000ml DuraView

The following list of Kutol items has received the NSF rating of E3:

- #5607 Santi-Gel Instant Hand Sanitizer, 4/1 flat top gallon
- #5635 Santi-Gel Instant Hand Sanitizer, 24/4oz oval bottle
- #5634 Santi-Gel Instant Hand Sanitizer, 24/4oz round bottle
- #5647 Santi-Gel Instant Hand Sanitizer, 24/8oz round bottle
- #5619 Santi-Gel Instant Hand Sanitizer, 12/8oz pump bottle
- #5630 Santi-Gel Instant Hand Sanitizer, 12/16oz pump bottle
- #5679 Santi-Gel Instant Hand Sanitizer, 4/64oz pump bottle
- #6667 Instant Hand Sanitizer, 4/2000ml DuraView
- #5666 Instant Hand Sanitizer, 12/800ml bag in a box
- #5612 Instant Hand Sanitizer, 8/1200ml bag in a box
- #5682 Instant Hand Sanitizer, 12/800ml cartridge
- #5693 Instant Hand Sanitizer, 8/1200ml cartridge
- #65636 Instant Hand Sanitizer, 8/1000ml Clean Shape
- #68278 Foaming Instant Hand Sanitizer (Quat), 8/950ml Clean Shape
- #68878 Foaming Instant Hand Sanitizer (62%), 8/950ml Clean Shape
- #68209 Foaming Instant Hand Sanitizer (Quat), 4/1 pour gallon
- #68809 Foaming Instant Hand Sanitizer (62%), 4/1 pour gallon
- #68241 Foaming Instant Hand Sanitizer (Quat), 6/1000ml EZ Foam
- #68841 Foaming Instant Hand Sanitizer (62%), 6/1000ml EZ Foam
- #68224 Foaming Instant Hand Sanitizer (Quat), 2/1000ml No Touch
- #68824 Foaming Instant Hand Sanitizer (62%), 2/1000ml No Touch
- #68217 Foaming Instant Hand Sanitizer (Quat), 24/50ml pump bottle
- #68817 Foaming Instant Hand Sanitizer (62%), 24/50ml pump bottle



March 12, 2003

Kutol Products Company
Attn: David Wood
7650 Camargo Road
Cincinnati, OH 45243

RE HSC
Category Code: E2
NSF Registration No. 059145

Dear David Wood:

NSF has processed the application for Registration of **HSC** to the *NSF Registration Guidelines for Proprietary Substances and Nonfood Compounds (2002)*, which are available at www.nsf.org/usda. The NSF Nonfood Compounds Registration Program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFR for appropriate use, ingredient and labeling.

This product is acceptable for use as a hand washing and sanitizing compound (E2) for use in and around food processing areas.

This product must be dispensed from adequate dispensers located a sufficient distance from the processing line to preclude accidental product contamination. The hands need not be washed prior to the use of this compound. After the use of the compound, the hands must be thoroughly rinsed with potable water.

NSF Registration of this product is current when the NSF Registration Number, Category Code, and Registration Mark appear on the NSF-approved product label, and the registered product name is included in the current NSF White Book Listing of Nonfood Compounds at the NSF website (<http://www.nsf.org/usda>). The NSF Registration Mark can be downloaded from the NSF website, at http://www.nsf.org/mark/download_marks.html.

NSF Listing of all registered Nonfood compounds by NSF International is not an endorsement of those compounds, or of any performance or efficacy claims made by the manufacturer.

Registration status may be verified at any time via the NSF web site, at <http://www.nsf.org/usda>. Changes in formulation or label, without the prior written consent of NSF, will void registration, and will supersede the on-line listing.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Carmen Grindatti'.

Carmen Grindatti
NSF Nonfood Compounds Registration and listing program



May 5, 2005

Mr. David Wood
KUTOL PRODUCTS COMPANY
7650 CAMARGO ROAD
CINCINNATI, OH 45243

RE: Summa Antibacterial Hand Cleaner Fragrance Free
Category Code: E2
NSF Registration No. 136509

Dear Mr. David Wood:

NSF has processed the application for Registration of **Summa Antibacterial Hand Cleaner Fragrance Free** to the NSF Registration Guidelines for Proprietary Substances and Nonfood Compounds (2004), which are available at <http://www.nsf.org>. The NSF Nonfood Compounds Registration Program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFR for appropriate use, ingredient review and labeling verification.

This product is acceptable for use as a hand washing and sanitizing compound (E2) for use in and around food processing areas.

This product must be dispensed from adequate dispensers located a sufficient distance from the processing line to preclude accidental product contamination. The hands need not be washed prior to the use of this compound. After the use of the compound, the hands must be thoroughly rinsed with potable water.

Label review was not performed since only distributors market this formulation under their own names. This letter is the only confirmation that the formulation complies with the NSF Guidelines. At your request, the product will not be listed in the NSF White Book™ nor on the NSF website. The product's registration can be verified by contacting NSF directly. Distributors' brands can be sub-registered without disclosing the formulation by having distributors specify the NSF Registration Number in their applications.

Changes in formulation without the prior written consent of NSF will void registration.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Carmen Grindatti'.

Carmen Grindatti
NSF Nonfood Compounds Registration Program

Company No: N04418



May 6, 2005

Mr. David Wood
KUTOL PRODUCTS COMPANY
7650 CAMARGO ROAD
CINCINNATI, OH 45243

RE: Santi-gel
Category Code: E3
NSF Registration No. 136723

Dear Mr. David Wood:

NSF has processed the application for Registration of **Santi-gel** to the NSF Registration Guidelines for Proprietary Substances and Nonfood Compounds (2004), which are available at <http://www.nsf.org>. The NSF Nonfood Compounds Registration Program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFR for appropriate use, ingredient review and labeling verification.

This product is acceptable for use as a hand sanitizing product (E3) in and around food processing areas. This product may be used only after thoroughly washing hands with soap or detergent and water, followed by rinsing with potable water. A potable water rinse is not required after the use of this product.

Label review was not performed since only distributors market this formulation under their own names. This letter is the only confirmation that the formulation complies with the NSF Guidelines. At your request, the product will not be listed in the NSF White Book™ nor on the NSF website. The product's registration can be verified by contacting NSF directly. Distributors' brands can be sub-registered without disclosing the formulation by having distributors specify the NSF Registration Number in their applications.

Changes in formulation without the prior written consent of NSF will void registration.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Carmen Grindatti'.

Carmen Grindatti
NSF Nonfood Compounds Registration Program

Company No: N04418



NSF International / Nonfood Compounds Registration Program

Nonfood Compounds
Program Listed

February 15, 2009

Mr. David Wood
KUTOL PRODUCTS COMPANY
7650 CAMARGO ROAD
CINCINNATI, OH 45243
UNITED STATES

RE: Foaming E-2 Bacteria Controlling Hand Sanitizer Cleaner
Category Code: E2
NSF Registration No. 141590

Dear Mr. David Wood:

NSF has processed the application for Registration of **Foaming E-2 Bacteria Controlling Hand Sanitizer Cleaner** to the NSF International Registration Guidelines for Proprietary Substances and Nonfood Compounds (2008), which are available at www.nsfwhitebook.org. The NSF Nonfood Compounds Registration Program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFR for appropriate use, ingredient and labeling review.

This product is acceptable for use as a hand washing and sanitizing compound (E2) for use in and around food processing areas.

This product must be dispensed from adequate dispensers located a sufficient distance from the processing line to preclude accidental product contamination. The hands need not be washed prior to the use of this compound. After the use of the compound, the hands must be thoroughly rinsed with potable water.

NSF Registration of this product is current when the NSF Registration Number, Category Code, and Registration Mark appear on the NSF-approved product label, and the Registered product name is included in the current NSF White Book Listing of Nonfood Compounds at the NSF website (www.nsfwhitebook.org). The NSF Registration Mark can be downloaded by clicking the "Download Registration Mark" link on the NSF website (www.nsfwhitebook.org).

NSF Listing of all Registered Nonfood compounds by NSF International is not an endorsement of those compounds, or of any performance or efficacy claims made by the manufacturer.

Registration status may be verified at any time via the NSF website, at www.nsfwhitebook.org. Changes in formulation or label, without the prior written consent of NSF, will void Registration, and will supersede the on-line listing.

Sincerely,

Clifton J. Mciellan
NSF Nonfood Compounds Registration Program

Company No: N04418



NSF International / Nonfood Compounds Registration Program

Nonfood Compounds
Program Listed

February 15, 2009

Mr. David Wood
KUTOL PRODUCTS COMPANY
7650 CAMARGO ROAD
CINCINNATI, OH 45243
UNITED STATES

RE: Foaming E-2 Bacteria Controlling Hand Sanitizer Cleaner
Category Code: E2
NSF Registration No. 141590

Dear Mr. David Wood:

NSF has processed the application for Registration of **Foaming E-2 Bacteria Controlling Hand Sanitizer Cleaner** to the NSF International Registration Guidelines for Proprietary Substances and Nonfood Compounds (2008), which are available at www.nsfwhitebook.org. The NSF Nonfood Compounds Registration Program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFR for appropriate use, ingredient and labeling review.

This product is acceptable for use as a hand washing and sanitizing compound (E2) for use in and around food processing areas.

This product must be dispensed from adequate dispensers located a sufficient distance from the processing line to preclude accidental product contamination. The hands need not be washed prior to the use of this compound. After the use of the compound, the hands must be thoroughly rinsed with potable water.

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Sincerely,

A handwritten signature in black ink, appearing to read "Clifton J. Mclellan", written in a cursive style.

Clifton J. Mclellan
NSF Nonfood Compounds Registration Program

Company No: N04418



NSF International / Nonfood Compounds Registration Program

Nonfood Compounds
Program Listed

May 11, 2009

Mr. David Wood
KUTOL PRODUCTS COMPANY
7650 CAMARGO ROAD
CINCINNATI, OH 45243
UNITED STATES

RE: Kutol ISE3 E-3 Instant Hand Sanitizer
Category Code: E3
NSF Registration No. 141987

Dear Mr. David Wood:

NSF has processed the application for Registration of **Kutol ISE3 E-3 Instant Hand Sanitizer** to the NSF International Registration Guidelines for Proprietary Substances and Nonfood Compounds (2008), which are available at www.nsfwhitebook.org. The NSF Nonfood Compounds Registration Program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFR for appropriate use, ingredient and labeling review.

This product is acceptable for use as a hand sanitizing product (E3) in and around food processing areas. This product may be used only after thoroughly washing hands with soap or detergent and water, followed by rinsing with potable water. A potable water rinse is not required after the use of this product.

NSF Registration of this product is current when the NSF Registration Number, Category Code, and Registration Mark appear on the NSF-approved product label, and the Registered product name is included in the current NSF White Book Listing of Nonfood Compounds at the NSF website (www.nsfwhitebook.org). The NSF Registration Mark can be downloaded by clicking the "Download Registration Mark" link on the NSF website (www.nsfwhitebook.org).

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Registration status may be verified at any time via the NSF website, at www.nsfwhitebook.org. Changes in formulation or label, without the prior written consent of NSF, will void Registration, and will supersede the on-line listing.

Sincerely,

Clifton J. Mclellan
NSF Nonfood Compounds Registration Program

Company No: N04418



NSF International / Nonfood Compounds Registration Program

Nonfood Compounds
Program Listed

June 15, 2009

Mr. David Wood
KUTOL PRODUCTS COMPANY
7650 CAMARGO ROAD
CINCINNATI, OH 45243
UNITED STATES

RE: Kutol Foaming Instant Hand Sanitizer
Category Code: E3
NSF Registration No. 141986

Dear Mr. David Wood:

NSF has processed the application for Registration of **Kutol Foaming Instant Hand Sanitizer** to the NSF International Registration Guidelines for Proprietary Substances and Nonfood Compounds (2008), which are available at www.nsfwhitebook.org. The NSF Nonfood Compounds Registration Program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFR for appropriate use, ingredient and labeling review.

This product is acceptable for use as a hand sanitizing product (E3) in and around food processing areas. This product may be used only after thoroughly washing hands with soap or detergent and water, followed by rinsing with potable water. A potable water rinse is not required after the use of this product.

NSF Registration of this product is current when the NSF Registration Number, Category Code, and Registration Mark appear on the NSF-approved product label, and the Registered product name is included in the current NSF White Book Listing of Nonfood Compounds at the NSF website (www.nsfwhitebook.org). The NSF Registration Mark can be downloaded by clicking the "Download Registration Mark" link on the NSF website (www.nsfwhitebook.org).

NSF Listing of all Registered Nonfood compounds by NSF International is not an endorsement of those compounds, or of any performance or efficacy claims made by the manufacturer.

Registration status may be verified at any time via the NSF website, at www.nsfwhitebook.org. Changes in formulation or label, without the prior written consent of NSF, will void Registration, and will supersede the on-line listing.

Sincerely,

Clifton J. Mclellan
NSF Nonfood Compounds Registration Program

Company No: N04418



NSF International / Nonfood Compounds Registration Program

Nonfood Compounds
Program Listed

December 9, 2009

Mr. David Wood
KUTOL PRODUCTS COMPANY
7650 CAMARGO ROAD
CINCINNATI, OH 45243
UNITED STATES

RE: Foaming Alcohol Hand Sanitizer
Category Code: E3
NSF Registration No. 142581

Dear Mr. David Wood:

NSF has processed the application for Registration of **Foaming Alcohol Hand Sanitizer** to the NSF International Registration Guidelines for Proprietary Substances and Nonfood Compounds (2009), which are available at www.nsfwhitebook.org. The NSF Nonfood Compounds Registration Program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFR for appropriate use, ingredient and labeling review.

This product is acceptable for use as a hand sanitizing product (E3) in and around food processing areas. This product may be used only after thoroughly washing hands with soap or detergent and water, followed by rinsing with potable water. A potable water rinse is not required after the use of this product.

NSF Registration of this product is current when the NSF Registration Number, Category Code, and Registration Mark appear on the NSF-approved product label, and the Registered product name is included in the current NSF White Book Listing of Nonfood Compounds at the NSF website (www.nsfwhitebook.org). The NSF Registration Mark can be downloaded by clicking the "Download Registration Mark" link on the NSF website (www.nsfwhitebook.org).

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Sincerely,

Clifton J. Mclellan
NSF Nonfood Compounds Registration Program

Company No: N04418

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