





## Specializing in FDA Regulatory Matters

June 22, 2019	
Zach Lafler KMI Cleaning Solutions, Inc. 157 Beadle Lake Road Battle Creek, MI 49014	
Dear Mr. Lafler:	
This is in response to your request for a regulatory opinion on the ingredients in your proprietary cleaning products, identified as "191 Performance & "Eco-Green 54-FG." Based on our understanding of the intended use of your product, we conclude that all the ingredients are regulated and can be used in your cleaning product.	
The use of the ingredients in your product are predicated on being use d consistent with current Go Manufacturing Practices which may require following with a potable water rinse, if applicable.	od
We trust that this information is satisfactory and helpful to your goals. Please let us know if you have questions.	ļ
Thank you for the opportunity to be of service to your company.	
Sincerely,	
Chairman & CEO	

EAS Consulting Group, LLC 1700 Diagonal Road, Suite 750, Alexandria, Virginia 22314 (877) 327-9808 Toll Free, (571) 447-5500, (703) 548-3270 Fax



Date of Issue: 1/30/2019 Date of Revision: 08/01/2023

#### **Letter of Guarantee**

**Product Name: 191 PERFORMANCE** 

**Product Item Code: KP191** 

KMI Cleaning Solutions, Inc. hereby guarantees that 191 Performance is safe and effective under the intended conditions of use as outlined in the product use instructions in accordance with FDA, Code of Federal Regulations, Title 21 and USDA/FSIS Sanitation Performance Standards Compliance §416.4(a), A-1 Guidelines where applicable. This product will not adulterate food products if it is used according to product use instructions.

Appropriate safety precautions must be used in compliance with plant safety procedures and standards while handling and using this product. 191 Performance is intended for use as a general cleaning compound on all surfaces with mechanical or steam cleaning devices.

Use Instructions: Cold Pipelines- Use 3-4 quarts of 191 Performance per 100 gallons of water at 150°-160°F for 15-20 minutes. Hot Circuit Cleaning, Cleaning of Hot Lines, Pasteurizers and Heat Exchange Surfaces-requires concentration ranging from 8-16 quarts of 191 Performance for each 100 gallons of water at 160°-190°F. Cleaning temperatures should exceed process temperatures by at least 5 to 10 degrees for best results. For circulation cleaning of milk lines use 1 to 3 oz. per gallon of hot water (145°-155°F). After cleaning cycle, triple rinse thoroughly with potable water at 180°-200°F before sanitizing and using equipment.

When used in processing areas, food products and packaging materials must be removed from the room or carefully protected. After using 191 Performance, all surfaces must be thoroughly rinsed with potable water. Sincerely,

#### **Zach Lafler**

Director of Business Development KMI Cleaning Solutions, Inc. 269-964-2257 or (800) 772-4616 zlafler@kmicleaningsolutions.com

Revised: 08/01/2023



## PRODUCT BULLETIN

Alkaline Concentrate Internal Tank Wash Cleaner & Degreaser

## 191 Performance

Conforms to USDA/FSIS Sanitation Performance Standards Compliance §416.4(a), A-1 and A-8 Guidelines.

#### PRODUCT DESCRIPTION

- 191 Performance is a highly concentrated alkaline blend containing potassium hydroxide
- Cleaning performance enhanced by a blend of chelating and water conditioning agents
- Specifically designed for use in high- and low-pressure CIP cleaning systems
- Can be used on a wide range of soil types and is safe on aluminum or other soft metals
- Optimum operating temperature range is 140°-210°F

#### **FEATURES AND BENEFITS**

- Low Foaming.
- Aids in automatic and manual CIP cleaning.
- Penetrates soils thoroughly and quickly.
- · Saponifies fats, greases and oils cooked onto surfaces for easy rinsing
- Rinses loosened soils easily and quickly from contact surfaces.

#### TYPICAL SPECIFICATIONS

Appearance	Clear Liquid
Color	Clear, Water White
Odor	Typical Detergent
Solubility	
pH Neat	
Specific Gravity	1.07
Foaming	Low Foaming
Flash Point	

#### **DILUTION**

- Minimum 600ppm to Maximum 2480ppm
- Minimum < 10pH to Maximum > 12.5pH in water
- Test Method, pH Tests Strips, KMI Part #TW026
- Conductivity Range: Minimum 1.60mS to Maximum 8.70mS
- Test Method, "Titration w/ Reagents" KMI part #203DTK

#### **SAFETY**

- Keep out of reach of children.
- Read label instructions and SDS carefully
- SDS available with delivery or upon request

#### **Government Regulations:**

Manufactured in accordance with Code of Federal Regulations, title 21 and FDA/USDA guidelines.

Revised 08/01/2023

# Product Usage Instructions 191 Performance

#### 191 Performance Features and Benefits:

- Low Foaming: Aids in automatic and manual CIP cleaning.
- Strong: Penetrates soils thoroughly and quickly. Saponifies fats, greases, and oils cooked onto surfaces for easy rinsing.
- Free Rinsing: Rinses loosened soils easily and quickly from contact surfaces.

#### **Recommended Uses:**

Alkaline cleaning cycle of hot and cold CIP pipelines, HTST units, evaporators, brew kettles, kegs, cookers, fryers, blanchers, fillers, and general food processing equipment.

#### **Use Instructions:**

**Cold pipelines:** Use 3-4 quarts of 191 Performance per 100 gallons of water at 150°-160°F for 15-20 minutes.

Hot Circuit Cleaning, Cleaning of Hot Lines, Pasteurizers, and Heat Exchange Surfaces: Requires concentration ranging from 9-18 quarts of 191 Performance for each 100 gallons of water at 160°-190°F. Cleaning temperatures should exceed process temperatures by at least 5°-10°F for best results.

For circulation cleaning of milk lines use 1-3 oz. per gallon of hot water (at 145°-155°F).

Note: After cleaning cycle, triple rinse thoroughly with potable water at 180°-200°F before sanitizing and using equipment.

### **Government Regulations:**

Manufactured in accordance with Code of Federal Regulations, title 21 and FDA/USDA guidelines.

Revised: 08/01/2023



## **Safety Data Sheet**

Issue Date: 01-Feb-2012 Revision Date: 03-Jan-2024 Version 1

#### 1. IDENTIFICATION

**Product Identifier** 

191 Performance **Product Name** 

Other means of identification

K191P **Product Code UN/ID No** NA1760

Recommended use of the chemical and restrictions on use

**Recommended Use** Heavy duty cleaner for industrial and institutional use only.

Details of the supplier of the safety data sheet

Supplier Address KMI GLOBAL 157 BEADLE LAKE RD BATTLE CREEK, MI 49014

**Emergency Telephone Number** 

**Company Phone Number** Phone: 269-964-2557

Fax: 269-964-7108

**Emergency Telephone (24 hr)** INFOTRAC 1-352-323-3500 (International)

1-800-535-5053 (North America)

#### 2. HAZARDS IDENTIFICATION

**Appearance** Clear liquid Physical State Liquid Odor Butyl odor

#### Classification

Skin corrosion/irritation	Category 1 Sub-category B
Serious eye damage/eye irritation	Category 1

#### **Hazards Not Otherwise Classified (HNOC)**

May be harmful if swallowed

#### Signal Word Danger

<u>Hazard Statements</u> Causes severe skin burns and eye damage



#### **Precautionary Statements - Prevention**

Do not breathe dust/fume/gas/mist/vapors/spray

Wash face, hands and any exposed skin thoroughly after handling

Wear protective gloves/protective clothing/eye protection/face protection

#### **Precautionary Statements - Response**

Immediately call a poison center or doctor/physician

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing Immediately call a poison center or doctor/physician

IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower

Wash contaminated clothing before reuse

IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing

Immediately call a poison center or doctor/physician

IF SWALLÓWED: Rinse mouth. Do NOT induce vomiting

#### **Precautionary Statements - Storage**

Store locked up

#### **Precautionary Statements - Disposal**

Dispose of contents/container to an approved waste disposal plant

#### 3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No	Weight-%
Sodium metasilicate	6834-92-0	5-15
Ethylene Glycol Monobutyl Ether	111-76-2	5-10
Sodium Tripolyphosphate	7758-29-4	<5
Potassium Hydroxide	1310-58-3	<5
Ethylenediamineteraacetic Acid	6381-92-6	<5
Trisodium Phosphate	7601-54-9	<5

<sup>\*\*</sup>If Chemical Name/CAS No is "proprietary" and/or Weight-% is listed as a range, the specific chemical identity and/or percentage of composition has been withheld as a trade secret.\*\*

#### 4. FIRST-AID MEASURES

#### **First Aid Measures**

Eye Contact IF IN EYES: Rinse immediately with plenty of water, also under the eyelids, for at least 15

minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately

call a poison center or doctor/physician.

**Skin Contact** IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin

with water/shower. Wash contaminated clothing before reuse. If skin irritation persists, call

a physician.

**Inhalation** If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is

difficult, give oxygen. Get medical attention immediately.

Ingestion IF SWALLOWED: call a poison control center or physician immediately. Rinse mouth. Do

not induce vomiting.

#### Most important symptoms and effects

**Symptoms** Causes severe skin burns and eye damage. May cause pain, conjunctivitis of the eyes or

burns. Ingestion may cause severe burns to mouth, throat or stomach. Inhalation may cause burns to upper respiratory tract and lung tissue depending on length of exposure.

#### Indication of any immediate medical attention and special treatment needed

Notes to Physician Treat symptomatically.

#### 5. FIRE-FIGHTING MEASURES

#### **Suitable Extinguishing Media**

Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable Extinguishing Media Not determined.

#### Specific Hazards Arising from the Chemical

Product is not flammable.

Hazardous Combustion Products None known.

#### Protective equipment and precautions for firefighters

As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

#### 6. ACCIDENTAL RELEASE MEASURES

#### Personal precautions, protective equipment and emergency procedures

**Personal Precautions**Use personal protective equipment as required.

**Environmental Precautions** Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See

Section 12, Ecological Information. See Section 13: DISPOSAL CONSIDERATIONS.

#### Methods and material for containment and cleaning up

**Methods for Containment** Prevent further leakage or spillage if safe to do so.

**Methods for Clean-Up**Confine and absorb into approved absorbent. Place material into approved containers for

disposal.

#### 7. HANDLING AND STORAGE

#### Precautions for safe handling

Advice on Safe Handling Handle in accordance with good industrial hygiene and safety practice. Use personal

protection recommended in Section 8. Avoid contact with skin, eyes or clothing. Do not breathe vapors. Wash face, hands and any exposed skin thoroughly after handling. Product should only be handled by trained personnel. For institutional and industrial use only.

#### Conditions for safe storage, including any incompatibilities

Storage Conditions Keep container tightly closed and store in a cool, dry and well-ventilated place. Keep away

from children and untrained personnel. Store locked up.

Incompatible Materials Strong acids.

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#### 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

#### **Exposure Guidelines**

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH
Sodium metasilicate 6834-92-0	2 mg/m <sup>3</sup>	2 mg/m <sup>3</sup>	-
Ethylene Glycol Monobutyl Ether 111-76-2	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ (vacated) TWA: 25 ppm (vacated) TWA: 120 mg/m³ (vacated) S* S*	IDLH: 700 ppm TWA: 5 ppm TWA: 24 mg/m³

#### **Appropriate engineering controls**

**Engineering Controls** Apply technical measures to comply with the occupational exposure limits. Eyewash

stations. Showers.

#### Individual protection measures, such as personal protective equipment

**Eye/Face Protection** Safety glasses as a minimum for protection.

**Skin and Body Protection** Wear suitable protective clothing. Wear waterproof gloves.

**Respiratory Protection** Ensure adequate ventilation, especially in confined areas. In case of inadequate ventilation

wear respiratory protection.

General Hygiene Considerations Handle in accordance with good industrial hygiene and safety practice. Wash face, hands

and any exposed skin thoroughly after handling. Wash contaminated clothing before reuse.

(Water = 1)

#### 9. PHYSICAL AND CHEMICAL PROPERTIES

#### Information on basic physical and chemical properties

**Physical State** Liquid **Appearance** Clear liquid Odor Butyl odor Color **Odor Threshold** Not determined Clear

Remarks • Method **Property Values** 

12.5

**Melting Point/Freezing Point** Not determined > 100 °C / >212 °F **Boiling Point/Boiling Range** Flash Point Not flammable

**Evaporation** 

Flammability (Solid, Gas) Liquid - not applicable

**Upper Flammability Limits** Not determined **Lower Flammability Limit** Not determined Vapor Pressure Not determined

Vapor Density >1 **Specific Gravity** 1.07

100% soluble Water Solubility Solubility in other solvents Not determined Partition Coefficient Not determined **Auto-ignition Temperature** Not determined

Decomposition Temperature
Kinematic Viscosity
Not determined

#### 10. STABILITY AND REACTIVITY

#### Reactivity

Not reactive under normal conditions.

#### **Chemical Stability**

Stable under recommended storage conditions.

#### **Possibility of Hazardous Reactions**

None under normal processing.

**Hazardous Polymerization** Hazardous polymerization does not occur.

#### **Conditions to Avoid**

See Sec. 7 Handling & Storage.

#### **Incompatible Materials**

Strong acids.

#### **Hazardous Decomposition Products**

None known.

#### 11. TOXICOLOGICAL INFORMATION

#### Information on likely routes of exposure

**Product Information** 

**Eye Contact** Causes severe eye damage.

**Skin Contact** Causes severe skin burns.

**Inhalation** Avoid breathing vapors or mists.

**Ingestion** Do not ingest.

#### Component Information

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
Sodium metasilicate 6834-92-0	= 600 mg/kg ( Rat )	-	-
Ethylene Glycol Monobutyl Ether 111-76-2	= 470 mg/kg ( Rat )	= 2270 mg/kg ( Rat ) = 220 mg/kg ( Rabbit )	= 2.21 mg/L ( Rat ) 4 h = 450 ppm ( Rat ) 4 h
Sodium xylenesulfonate 1300-72-7	= 1000 mg/kg ( Rat )	-	-

10 T Chemine

#### Information on physical, chemical and toxicological effects

**Symptoms** Please see section 4 of this SDS for symptoms.

#### Delayed and immediate effects as well as chronic effects from short and long-term exposure

Carcinogenicity

Not classifiable as a human carcinogen.

Chemical Name	ACGIH	IARC	NTP	OSHA
Ethylene Glycol Monobutyl	A3	Group 3		
Ether 111-76-2				

#### Legend

ACGIH (American Conference of Governmental Industrial Hygienists)

A3 - Animal Carcinogen

IARC (International Agency for Research on Cancer)

Group 3 IARC components are "not classifiable as human carcinogens"

#### **Numerical measures of toxicity**

Not determined

#### 12. ECOLOGICAL INFORMATION

#### **Ecotoxicity**

The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.

#### Component Information

Chemical Name	Algae/aquatic plants	Fish	Toxicity to	Crustacea
			microorganisms	
Sodium metasilicate		210: 96 h Brachydanio rerio		216: 96 h Daphnia magna
6834-92-0		mg/L LC50 semi-static 210:		mg/L EC50
		96 h Brachydanio rerio mg/L		_
		LC50		
Ethylene Glycol Monobutyl		1490: 96 h Lepomis		1698 - 1940: 24 h Daphnia
Ether		macrochirus mg/L LC50		magna mg/L EC50 1000: 48
111-76-2		static 2950: 96 h Lepomis		h Daphnia magna mg/L
		macrochirus mg/L LC50		EC50

#### Persistence/Degradability

Not determined.

#### **Bioaccumulation**

Not determined.

#### **Mobility**

Chemical Name	Partition Coefficient
Ethylene Glycol Monobutyl Ether	0.81
111-76-2	

#### **Other Adverse Effects**

Not determined

#### 13. DISPOSAL CONSIDERATIONS

#### **Waste Treatment Methods**

Disposal of Wastes Disposal should be in accordance with applicable regional, national and local laws and

regulations.

Contaminated Packaging Disposal should be in accordance with applicable regional, national and local laws and

regulations.

#### 14. TRANSPORT INFORMATION

**Note** Please see current shipping paper for most up to date shipping information, including

exemptions and special circumstances.

DOT

UN/ID No NA1760

Proper Shipping Name Compounds, cleaning liquid (Potassium Hydroxide, Disodium trioxosilicate), 8, II

Hazard Class 8
Packing Group II

IATA

UN/ID No NA1760

Proper Shipping Name Compounds, cleaning liquid (Potassium Hydroxide, Disodium trioxosilicate), 8, II

Hazard Class 8
Packing Group ||

**IMDG** 

UN/ID No NA1760

Proper Shipping Name Compounds, cleaning liquid (Potassium Hydroxide, Disodium trioxosilicate), 8, II

Hazard Class 8
Packing Group ||

#### 15. REGULATORY INFORMATION

#### International Inventories

Chemical Name	TSCA	DSL	NDSL	EINECS	ELINCS	ENCS	IECSC	KECL	PICCS	AICS
Sodium metasilicate	Present	Х		Present		Present	Х	Present	X	Х
Ethylene Glycol Monobutyl Ether	Present	Х		Present		Present	Х	Present	Х	Х
Sodium Tripolyphosphate	Present	Χ		Present		Present	Х	Present	Χ	Х

#### Legend:

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory

DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List

EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances

ENCS - Japan Existing and New Chemical Substances

IECSC - China Inventory of Existing Chemical Substances

KECL - Korean Existing and Evaluated Chemical Substances

PICCS - Philippines Inventory of Chemicals and Chemical Substances

AICS - Australian Inventory of Chemical Substances

#### US Federal Regulations

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#### **SARA 313**

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	CAS No	Weight-%	SARA 313 - Threshold Values %
Ethylene Glycol Monobutyl Ether - 111-76-2	111-76-2	5-10	1.0

#### **US State Regulations**

#### **California Proposition 65**

This product does not contain any Proposition 65 chemicals.

#### **U.S. State Right-to-Know Regulations**

Chemical Name	New Jersey	Massachusetts	Pennsylvania
Ethylene Glycol Monobutyl Ether	Х	X	X
111-76-2			

#### **16. OTHER INFORMATION**

NFPA **Health Hazards Flammability** Instability Special Hazards Not determined Not determined Not determined Not determined **Personal Protection** HMIS **Health Hazards Flammability Physical Hazards** 

Issue Date: 01-Feb-2012 **Revision Date:** 03-Jan-2024 **Revision Note:** New logo

#### Disclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

**End of Safety Data Sheet** 



## ועד הרבנים דעטראיט

## Council of Orthodox Rabbis of Greater Detroit

18877 West 10 Mile Road #101 Phone: (248) 559 – 5005 Fax: (248) 559 – 5202 Southfield, MI 48075 cor@cordetroit.com www.cordetroit.com

Rabbi Yisroel M. Levin Rabbi Yechiel Morris Rabbi Elimelech Silberberg Presidium

Rabbi Moshe Wainkrantz Director

Rabbi Beryl Broyde Rabbi Yosef Krupnik K-COR – Kashrus Division December 15, 2023

To Whom It May Concern:

The following cleaning products, manufactured by **KMI Cleaning Solutions**, 157 Beadle Lake Road, Battle Creek, MI 49014, and by **Arrow Chemical Products** Inc., 2067 Saint Ann Street, Detroit, MI 48216, which are going to be used at Kosher tank wash facilities throughout the country, are certified Kosher and Pareve, and are under the supervision of the Council of Orthodox Rabbis of Greater Detroit. Both plants have been visited by our Kashruth administrator, Rabbi Krupnik, and will continue to be inspected throughout the year.

- Kleen Strip Powder
- D-8000 Powdered Detergent
- Breakaway Detergent
- 191 Performance
- TW-22
- Work Horse
- Citra Clean
- Alligator

- X-20
- Swish
- Orange Gator
- Sudz
- Passivator
- Citric Passivator
- Metal Prep

The products are a family of detergents based on Kosher Pareve approved acids (sulfuric acid, phosphoric acid, etc.) and other chemicals approved as Kosher and Pareve.

This certificate is valid through December 31, 2024.

Sincerely,

Rabbi Moshe Wainkrantz

Director, Council of Orthodox Rabbis of Greater Detroit

