



Specializing in FDA Regulatory Matters

August 11, 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 "Swish" & "X-20". 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 used consistent with current Good Manufacturing Practices which may require following with a potable water rinse, if applicable.

We trust that this information is satisfactory and helpful to your goals. Please let us know if you have questions.

Thank you for the opportunity to be of service to your company.

Sincerely,

Edward A. Steele Chairman & CEO

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

Letter of Guarantee

Product Name: SWISH Product Item Code: KSH

KMI Cleaning Solutions, Inc. hereby guarantees that SWISH 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.

SWISH is intended for use as a general cleaning compound on all surfaces with mechanical or steam cleaning devices.

Use Instructions: (CIP) RINSE: Immediately rinse the system with clean warm water (38°-40°C/100°-110°F). Do not circulate water. Drain System. WASH: Circulate a hot water (65°C/160°F to 93°C/200°F) of SWISH for at least 10 minutes. Wash solution should not drop below 160°F (63°C). Drain System. USE CONCENTRATION: Water hardness of 0-19 grains SWISH dilution ratio is 1500-2000 ppm. Water hardness of 10-40 grains SWISH dilution ratio is 4500-5000 ppm.

When used in processing areas, food products and packaging materials must be removed from the room or carefully protected. After using SWISH, 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

Product Usage Instructions Swish

Swish Features and Benefits:

- Phosphate free, silicate free, chlorinated, and chelated, non-foaming
- Created for circulation and pressure spray cleaning of food processing equipment
- Designed for Hard Water use

Recommended Uses:

Circulation and Pressure Spray Cleaning leaves stainless steel tanks and pipes film free and bright, great for circulation cleaning.

Use Instructions:

Clean In Place Instructions

- RINSE: Immediately rinse the system with clean warm water (38°-40°C/100°-110°F). Do not circulate water. drain system.
- WASH: Circulate a hot water (65°C/160°F to 93°C/200°F) of SWISH for at least 10 minutes. Wash water solution should not drop below 160°F (63°C). Drain system.

To Determine Use Concentration:

WATER HARDNESS	SWISH DILUTION RATIO			
0-19 grains	1500-2000 ppm			
10 to 40 grains	4500-5000 ppm			

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

<u>Safety:</u> Contains sodium hydroxide. Do not use on aluminum and other soft metals. Store in a cool location.

<u>Danger:</u> Highly alkaline. Contains caustic soda. Avoid contact with skin, eyes, or clothing. In case of skin contact, flush with plenty of water and clean with mild soap. In case of eye contact, flush with plenty of water for 15 minutes and get medical attention.

Government Regulations:

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

Revised: 08/01/2023



PRODUCT BULLETIN

Chlorinated Alkaline Concentrate Internal & Tank Wash

Swish

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

PRODUCT DESCRIPTION

- Alligator-FG is a highly concentrated non-caustic alkaline blend containing
- Swish is a highly concentrated chlorinated alkaline blend formulated for use in applications with mechanical energy such as CIP cleaning systems where no foam is desired
- Cleaning performance enhanced by a blend of chelating and water conditioning agents
- Can be used on a wide range of soil types, but not recommended on aluminum or other soft metals
- Optimum operating temperature range is 140°-210°F

FEATURES AND BENEFITS

- Phosphate free, silicate free, chlorinated, and chelated
- Non-Foaming
- Created for circulation and pressure spray cleaning of food processing equipment
- Designed for hard water use
- Rinses loosened soils easily and quickly from contact surfaces

TYPICAL SPECIFICATIONS

Appearance	Clear Liquid
Color	Light Yellow
Odor	
Solubility	Complete in water
pH Neat	>13.5
Specific Gravity	1.15-1.16
Foaming	
Flash Point	

DILUTION

- Minimum < 10pH to Maximum > 12.5pH in water
- Test Method, pH Tests Strips, KMI Part #TW026
- Minimum 1860ppm to Maximum 8000ppm
- Conductivity Range: Minimum 6.40mS to Maximum 35.04mS
- Test Method, "Titration w/ Reagents" KMI part #203DTK

SAFETY

- Keep out of reach of children.
- For industrial and commercial use only
- 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.



Safety Data Sheet

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

1. IDENTIFICATION

Product Identifier

Product Name Swish

Other means of identification

Product Code KSH 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 Colorless to lightly colored Physical State Liquid Odor Sharp

liquid

Classification

Corrosive liquid	Category 1B
Single Exposure	Category 3

Hazards Not Otherwise Classified (HNOC)

May be harmful if swallowed

Signal Word Danger

Hazard Statements

Causes severe skin burns and eye damage. May cause respiratory irritation. Toxic to aquatic life.



Precautionary Statements - Prevention

Wear protective equipment when handling. Use only with adequate ventilation. Avoid release into the environment.

Precautionary Statements - Response

Immediately call a poison center or doctor/physician

IF IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes, while holding eyelids apart to ensure flushing of entire surface.

IF ON SKIN: Immediately flush skin with plenty of water for at least 15 minutes, while removing contaminated clothing and shoes. Thoroughly clean clothing and shoes before reuse. Call a physician.

IF INHALED: Remove to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. If breathing difficult give oxygen. Call physician.

IF SWALLOWED: Rinse mouth, do not induce vomiting. Rinse mouth with water. Dilute stomach contents by drinking water. If vomiting occurs spontaneously, keep head below hips to prevent breathing vomit into lungs. Never give anything by mouth to an unconscious person. Call a physician or poison control center immediately.

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 Hypochlorite	7681-52-9	1-5			
Sodium Hydroxide	1310-73-2	10-20			

^{**}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: Immediately flush eyes with plenty of water for at least 15 minutes, while

holding eyelids apart to ensure flushing of entire surface. Call a physician.

Skin Contact IF ON SKIN (or hair): Immediately flush skin with plenty of water for at least 15 minutes,

while removing contaminated clothing and shoes. Thoroughly clean clothing and shoes

before reuse. Call a physician.

Inhalation IF INHALED: Remove to fresh air. If not breathing, give artificial respiration, preferably

mouth to mouth. If breathing is difficult give oxygen. Call a physician.

Ingestion IF SWALLOWED: Do not induce vomiting. Rinse mouth with water. Dilute stomach contents

by drinking water. If vomiting occurs spontaneously, keep head below hips to prevent breathing of vomit into lungs. Never give anything by mouth to an unconscious person. Call

a physician or poison control immediately.

Most important symptoms and effects

Symptoms Causes severe skin burns and eye damage. May cause respiratory irritation. Onset of

symptoms may be delayed following exposure.

Indication of any immediate medical attention and special treatment needed

Notes to Physician

Consider oral administration of sodium thiosulfate solutions if sodium hypochlorite is ingested. Do not administer neutralizing agents, exothermic reaction may result and cause

further damage.

5. FIRE-FIGHTING MEASURES

Suitable Extinguishing Media

Water or water spray to cool fire exposed containers. Use any means of extinguish surrounding fire.

Unsuitable Extinguishing Media Not determined.

Specific Hazards Arising from the Chemical

Not considered to be a fire hazard. Release oxygen when heated, causing increased severity of an existing surrounding fire.

Hazardous Combustion Products None known.

Protective equipment and precautions for firefighters

In the event of fire, wear full protective clothing and NIOSH approved self-contained breathing apparatus (SCBA) with full face shield, operated in positive pressure mode. Stay away from ends of tanks. Cool tanks and drums with water spray until well after fire is out.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal Precautions Adequately ventilate area of leak or spill. Wear appropriate personal protective equipment

(PPE), as specified in Section 8. Isolate area to keep unprotected personnel from entering.

Environmental Precautions EPA regulations require reporting spills and releases to the soil, air and water, in excess of

the reportable quantity (103.4 gallons of solutions), to the National Response Center. Reporting to the State Emergency Response Commission (SERC) warning point and local

authorities is also required.

Methods and material for containment and cleaning up

Methods for Containment Stop the leak if possible. Contain and recover liquid when possible.

Methods for Clean-Up Absorb spilled liquid with an inert material such as vermiculite, sand or earth and place

recovered material in an approved, compatible chemical waste container. Do not use

combustible materials such as cardboard or saw dust as an absorbent.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on Safe Handling Observe all warnings and precautions stated on the container label. Wear personal

protective equipment when handling, opening containers and using hypochlorite solutions.

Conditions for safe storage, including any incompatibilities

Storage Conditions Store in a cool, dry, ventilated storage area with good drainage. Protect from physical

damage. Keep out of sunlight, away from direct heat, water and incompatible materials. DO

not wash out container and use it for other purposes.

Revision Date: 03-Jan-2024 Swish

Incompatible Materials

Ammonia, amines, ammonium salts, acids, methanol, cellulose, reducing agents, oxidizing

metals, and bisulfates.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Exposure Guidelines

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH
Sodium Hypochlorite 7681-52-9	0.5 ppm as C12	1 ppm as C12 (TWA)	-

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

Use chemical safety goggles and/or full-face shield where splashing is possible. Maintain **Eye/Face Protection**

eye wash fountain and quick drench facilities (safety shower) in work areas.

Rubber or neoprene gloves and additional protection including impervious boots, apron, or **Skin and Body Protection**

coveralls, as needed in areas of unusual exposure to prevent skin contact.

If exposure limits are exceeded and engineering controls are not feasible, full face **Respiratory Protection**

respirator, with an acid gas cartridge, may be worn up to 50 times permissible exposure limit (PEL). For emergencies or instances where the exposure levels are not known, use full face, positive pressure, air supplied respirator. Warning, air purifying respirators of not

provide protection in oxygen deficient atmosphere.

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 Transparent liquid Odor Sharp odor Color Colorless to lightly colored **Odor Threshold** Not determined

Property Values Remarks • Method

На 12.5

Melting Point/Freezing Point Not determined

Boiling Point/Boiling Range 180 °F decomposes slightly

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** Unavailable **Specific Gravity** 1.15-1.16

Water Solubility Infinitely soluble in water

Solubility in other solvents Not determined **Partition Coefficient** Not determined

Auto-ignition Temperature
Decomposition Temperature
Kinematic Viscosity
Dynamic Viscosity
Explosive Properties
Oxidizing Properties
Not determined
Not determined
Not determined
Not determined
Not determined
Not determined

10. STABILITY AND REACTIVITY

Reactivity

Not reactive under normal conditions.

Chemical Stability

Slowly decomposes on contact with air. Decomposition rate increases with concentration a temperature. Exposure to sunlight accelerates decomposition. Sodium hypochlorite solutions become less toxic with age.

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

Ammonia (chloramines gas may evolve), amines, ammonium salts, acids, methanol, cellulose, reducing agents, oxidizing metals, and bisulfates.

Hazardous Decomposition Products

When heated to decomposition, emits toxic chlorine fumes and will react with water or steam to produce heat and toxic, corrosive fumes. Thermal decomposition results in the emission of chlorine oxides.

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 hypochlorite 7681-52-9	LD50(rat): 8200 mg/kg	LD50(rabbits): 10000 mg/kg	-

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.

Numerical measures of toxicity

Not determined

12. ECOLOGICAL INFORMATION

Ecotoxicity

This product is highly toxic to aquatic organisms.

Component Information

No information available

Persistence/Degradability

Not determined.

Bioaccumulation

Not determined.

Mobility

No information available

Other Adverse Effects

Not determined

13. DISPOSAL CONSIDERATIONS

Waste Treatment Methods

Disposal of WastesDo not allow product to enter storm drains, lakes, streams or other bodies of water. Not

harmful to septic systems.

Contaminated Packaging Do not reuse empty container.

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 (Sodium Hydroxide)

Hazard Class 8
Packing Group ||

IATA

UN/ID No NA1760

Proper Shipping Name Compounds, Cleaning liquid (Sodium Hydroxide)

Hazard Class 8
Packing Group ||

IMDG

UN/ID No NA1760

Proper Shipping Name Compounds, Cleaning liquid (Sodium Hydroxide)

Hazard Class 8
Packing Group ||

15. REGULATORY INFORMATION

International Inventories

Chemical Name	TSCA	DSL	NDSL	EINECS	ELINCS	ENCS	IECSC	KECL	PICCS	AICS
Sodium Hypochlorite	Listed	Listed		X		X	X	X	X	X

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

SARA 313

Not subject to Toxic Chemical Release Inventory Reporting.

US State Regulations

California Proposition 65

This product does not contain any Proposition 65 chemicals.

U.S. State Right-to-Know Regulations

None known

16. OTHER INFORMATION

NFPA **Health Hazards Flammability** Instability **Special Hazards** Not determined Not determined Not determined Not determined HMIS **Health Hazards** Flammability **Physical Hazards Personal Protection** 2 0 1 В

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

<u>Disclaimer</u>

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

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Southfield, MI 48075

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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

