DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration College Park, MD 20740

December 2, 2008

Phil Bellan Envirocleanse LLC 14019 SW Freeway Ste 301-387 Sugar Land, TX 77478

Dear Mr. Bellan:

This is in response to your letter of November 6, 2008, to the Food and Drug Administration (FDA), concerning an electrochemical activation (ECA) technology product that Envirocleanse LLC manufactures. You note that, in the past, FDA has confirmed that a similar ECA technology product is suitable for generating chlorine for food use applications.

Your letter describes Envirocleanse LLC's ECA technology as an electrolysis of a dilute solution of sodium chloride and water that produces an analyte consisting of water (99.6%), sodium chloride (0.36%) and hypochlorous acid.

Based on the information that you provided, we conclude that the chlorine solutions generated by ECA technology are suitable for food processing applications. Therefore, we have no objection to the use of ECA technology to produce chlorine solutions for food processing applications where the technology is used in a manner consistent with current good manufacturing practices. Furthermore, this ECA technology does not need additional FDA approval.

We believe that our letter is responsive to your inquiry. If you have any further questions concerning this matter, please do not hesitate to contact us.

Sincerely

Robert L. Martin, Ph.D.

Division of Biotechnology
and GRAS Notice Review
Office of Food Additive Safety

Center for Food Safety

Center for Food Safety and Applied Nutrition