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May 28, 2012

Subject: Revision 12 Soysoap, Agri-Solv, Wakeup, and Paradiso Green.

The purpose of this letter is to describe the safe and natural quality standards for our six (6) Angstrom Ternary Colloidal Physics Technology product for Agriculture which we manufacture. We believe our product meets safety, health and quality certification standards which are “Beyond Organic” as required by USDA’s National Organic Program (NOP) Rule. We have not applied for OMRI certification in the U.S. because OMRI requires complete disclosure of our proprietary formulation. Thus we are not included in the OMRI Products List. However, please note that the OMRI Generic Materials List states on page 3: “Because participation in the OMRI Review Program is voluntary, a product’s absence from the *OMRI Products List* does not imply its failure to comply with the relevant organic standards.” We simply hold our product to a more exacting set of safety standards while preserving the integrity of our product against imitations. Here are some of the safety and effectiveness tests and certifications we meet:

1. OSHA-CERTIFIED FREE OF TOXIC OR HAZARDOUS COMPONENTS.

BioBased ingredients are built exclusively from refined extracts originating with tree oils, sugar, and corn. Our formulation complies with OSHA CFR - 1910.1200 Section (i) "Trade Secrets:" Contains No Hazardous or Toxic Components under Current OSHA Definitions. (OSHA stands for the U.S. Occupational Safety and Health Administration.)

2. FOOD AND DRUG ADMINISTRATION APPROVED SAFE INGREDIENTS.

Everything Added to Food in the United States (EAFUS)

This information is generated from a database maintained by the U.S. Food and Drug Administration (FDA) Center for Food Safety and Applied Nutrition (CFSAN) under an ongoing program known as the Priority-based Assessment of Food Additives (PAFA). PAFA contains administrative, chemical and toxicological information on over 2000 substances directly added to food, including substances regulated by the U.S. Food and Drug Administration (FDA) as direct, "secondary" direct, and color additives, and Generally Recognized As Safe (GRAS) and prior-sanctioned substances. In addition, the database contains only administrative and chemical information on less than 1000 such substances. The more than 3000 total substances together comprise an inventory often referred to as *"Everything" Added to Food in the United States (EAFUS)*.

The EAFUS list of substances contains ingredients added directly to food that FDA has either approved as food additives or listed or affirmed as GRAS. Nevertheless, it contains only a partial list of all food ingredients that may in fact be lawfully added to food, because under federal law some ingredients may be added to food under a GRAS determination made independently from the FDA. The list contains many, but not all, of the substances subject to independent GRAS determinations. For information about the GRAS notification program please consult the Inventory of GRAS Notifications. Additional information on the status of Food and Color Additives can be obtained from the [Food Additive Status List](#) or the [Color Additive Status List](#) (formerly called Appendix A of the Investigations Operations Manual). <http://www.fda.gov/food/foodingredientspackaging/ucm115326.htm>

<http://www.accessdata.fda.gov/scripts/fcn/fcnNavigation.cfm?rpt=eafusListing&displayAll=true>

3. CERTIFIED ECOLOGICALLY SAFE BY SINGAPORE AND HONG KONG.

Two of the most environmentally strict governmental bodies in the Pacific region have awarded our product their "green" label as ecologically sound. To achieve this, we needed to present a safe history of usage, plus extensive laboratory tests. This included testing by Wellab Testing and Research in Hong Kong in 2007 to certify that normal application rates of our product contain no detectable ethylene-diamine tetra-acetic acid (EDTA), nitrilo-tri-acetate (NTA), alkyl phenol ethoxylate (APEO), phosphate, volatile organic compounds or chlorine bleaching agents. This official laboratory report is available for review on request. The approval by appropriate agencies entitles our product to carry these seals:



4. CERTIFIED SAFE FOR DRINKING WATER AND SOILS.

Attached you will find a letter from the Florida Department of Environmental Protection. It states: "The Bureau of Petroleum Storage Systems hereby accepts Biobased AG cleaning formulations for the remediation of petroleum and other suitable contaminants in groundwater and soil, in situ and ex situ." What this means is our product is so non-toxic and natural that it won't hurt soil or groundwater. This certification is without restriction. This was determined by the Florida state government, one of the most environmentally strict agencies in the United States. We can provide detailed information on this certification if needed.

5. NO DETECTABLE TOXIC HEAVY METALS.

We have tested our formulation using EPA 6010 / 7471 for heavy metals and the report was "no detection" for Arsenic, Cadmium, Cobalt, Molybdenum, Nickel, Lead, Selenium, Mercury, Copper, or Chromium. This was laboratory certified and we can provide documentation on request. Our product does contain a trace amount of zinc, which is essential for plant and human nutrition.

6. RADIOCARBON ANALYSIS ASSURES IT IS "BIOBASED."

Each variation of our product is obtaining certification as a USDA-certified "BioBased Preferred" product. We have already determined the modern carbon content of biobased products using radiocarbon analysis at the Iowa State University Center for Industrial Research and Service (CIRAS) College of Engineering, 2272 Howe Hall, Ames, Iowa. Results of the radiocarbon analyses show that all carbon in our product is organic carbon of present day plant origin. Analyses were performed by conventional radiocarbon analytical methods using ASTM method D 6866-05. Analyses are believed to be accurate to within 3% (absolute). What this means is the product is made of 100% biological plant life, and contains no carbon from a petroleum source. We can provide detailed results on request. For example, a widely retailed formulation of our product is USDA certified and entitled to carry the "USDA Certified Biobased Product label as shown on the retail bottle below:



7. CONFIRMED NO GENETICALLY MODIFIED ORGANISMS (GMO's).

There is a rising global concern about health effects of genetically modified ingredients in our food supply. We verified that our formulation is GMO-free. The testing was done at a leading U.S. specialty laboratory, Genetic ID, in Fairfield, Iowa. Results can be confirmed with Nancy Musgrave, Senior Technical Advisor, Genetic ID NA, Inc. Telephone: 1-641-472-9979 ext. 102. E-mail: nmusgrave@genetic-id.com. Website: www.genetic-id.com. Please refer to test 49010. We can also supply copies of lab reports at your request that show we successfully passed: 35S / NOS Qualitative PCR Analysis, Corn/Maize Reference Gene, Inhibition Test, 35S Promoter Qualitative and NOS Terminator Qualitative Tests.

8. COMPATIBLE WITH BENEFICIAL SOIL ORGANISMS.

We have run lab tests to check whether our product impacts beneficial soil bacteria. Marketers of those biological products assure us they see no negative effect on a wide array of live organisms, such as rhizobia, mycorrhizae and nitrogen fixing organisms. A major goal of agricultural production is to enhance the population and diversity of these organisms which are synergistic with crop roots. Our product contains no bacterial or fungal organisms, or biological products of such organisms such as enzymes.

9. GENERALLY ACCEPTED AS SAFE AROUND PEOPLE AND ANIMALS.

Variations on our formula are used by veterinarians to cleanse and heal animal injuries. We have had many years of worldwide experience in this area. We create specialized variations on our product for cleaning in hospitals, restaurants and homes. They are sold by multinational retailers. In 2003, the testing firm SMI Corp. of Miami, Florida confirmed that

our product conformed to all applicable standards established by the Boeing Company for cleaning interiors of commercial airliners. This included tests for flash point safety, freedom from metal corrosion and compatibility with surfaces such as vinyl and Tedlar. Complete test results are available on request.

10. FIELD-PROVEN IN ENHANCING HEALTH AND NUTRITIONAL QUALITY OF CROPS.

This is our primary objective. “Organic” standards of certifying agencies such as OMRI are useful in *prohibiting* certain practices or products such as genetic engineering which may detract from the nutritional quality of food. But organic certification is not a consistent assurance of nutrient density and life-enhancing quality of the crops actually raised.

11. EUROPEAN UNION’S REACH COMPLIANT



The European Union's REACH Regulation (Registration, Evaluation and Authorization of Chemical Substances – EC1907/2006) was enacted to regulate chemicals and their safe use for the protection of human health and the environment.

REACH requires manufacturers and importers gather information on the properties of their chemical substances. This will enable safe handling and the registration of chemical information in a central database managed by the European Chemicals Agency (ECHA).

12. CALIFORNIA PROPOSITION 65 COMPLIANT



The Safe Drinking Water and Toxic Enforcement Act, 1986 (also known as Proposition 65) is a California law that has been in effect since 1986 to promote clean drinking water and keep toxic substances that cause cancer and birth defects out of consumer products.

13. ROTTERDAM, STOCKHOLM, BASEL CONVENTION

All Biobased USA products are in compliance with the above convention standards for

ROTTERDAM, STOCKHOLM, BASEL CONVENTION for Fertilizers and Pesticides.



14. CHINA: Biobased USA Technology was given the first approval to sell its technology into China 2012. It's a License ID Code the Government keeps on file which allows for import and the selling our product. We are the only company in USA/Asia with this approval, it is a new category that is been defined.



15. Favorably reviewed by OCIA International.

In February 2009, a letter written to one of our farmer clients by a Certification Specialist of OCIA International, Inc. (the Organic Crop Improvement Association) stated about our product: *“From the information provided, the product did not appear to contain any ingredients that are prohibited by OCIA Standards, or National Organic Program.”* The advisory letter noted that an OCIA-certified producer would not be suspended for use of this product. However, we were concerned that this implied “permission to use” might be confused with formal OCIA certification, so we asked OCIA to suspend this letter comment. Even though the OCIA letter is one more indication of our product’s natural safety, we consider it a lesser standard than we choose to meet.

Of the first nine rigorous criteria listed above, the U.S. National Organic Program requires only one for organic certification: No GMO seed may be used. We meet all 12 of these

standards. They add up to the reasons why we believe that we formulate an ecologically sound, economically valuable product which is “beyond organic.”

The government of Panama certifies For 10 years SoySoap as an “Organic Fertilizer” product. The government of Panama certifies for 10 years SoySoap S-100 as an “Organic Pesticide as a Fungicide, Bactericide, and Insecticide” product.

Here are the certifying documents:



NSF International

17. NSF has processed the application for Registration of ALL Purpose Cleaner/Degreaser to the NSF Registration Guidelines for Proprietary Substances and Non Food Compounds (2009), which available at www.nsfwhitebook.org. The NSF Nonfood Compounds Registration Program is the continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements including FDA 21 CFA for appropriate use, ingredient and labeling review.

This product is acceptable for use as a general cleaner (A1) on all surfaces in and around food processing areas, where its use is not intended for direct food contact. Use of this product for food processing or handling facilities requires that all food products and packaging materials be removed or protected prior to product use. A potable water rinse of cleaned surfaces is required after the use of this product. When used according to manufacturer’s instructions the cleaner shall neither exhibit a noticeable odor nor leave a

visible residue.



18. Eurofins, Hamburg, Germany physical chemical analysis results on Soysoap tested sample for SFDDA Quaternary Ammonium cations, Benzyldimethyldodecylammonium chloride (BAC-C1) Cetalkonium chloride (BAC-C16) , Didecyldimethylammoniumchlorid, Miristalkonium Chloride (BAC-C14), SF285 Benzethonium Chloride and SF146 Pesticide Screening (GC/MS& LC/MS/MS) for conventional food of polar pesticides . There was no detection of any substance at <0.1 g/kg.



Human Skin Patch Test – Demonological Test

19. Tests were conducted by Awesome Technology Co, Ltd Tsuen Wan, Hong Kong, PRC. Test Method: Hygienic Standard Certification for Cosmetics, Ministry of Health, PRC, 2007, Edition, Part five, the method of Human security and Efficacy evaluation, Tow, Human Skin Close Patch Test. Test Substance: Diluted material soysoap 1 was 100:1 solution. Negative Control was Distilled Water. Panel Demographics 24 females' volunteers who were selected according to the inclusion and exclusion criteria. And all their data are exploitable the age range of 24 volunteers is 35 to 79 years old. Testing procedure: About 0.025mL (solution, on the filter paper with Finn Chambers, Patches were removed 24 hours after the investigational products application. The Dermatologists observed and graded the patch area at half an hour, 24 hours and 48 hours respectively after the removal and the patch according to the Hygienic Standard for Cosmetics, in parallel, a blank patch was applied like the investigational products. **Test Results all skin reaction was negative reaction.**



South Coast Air Quality Management District (AQMD) Clean Air Tests

The "Soysoap" submitted product has been successfully met all requirements for the Clean Air Solvent Certificate from the South Coast Air Quality Management District (AQMD).
20. The Certification is good for 5 years from the date of issuance and maybe reviewed upon recertification by the AQMD.

Laboratory Results and Analysis:

There were no Volatile Organic Hazardous Air Pollutant (VOHAP) detected

There were no Global Warming Compounds (GWC) Detected.

There were no Ozone Depleting Compounds (OWC) Detected.

The reactivity of the compound detected is below the MIR value of toluene.

The VOC is estimated to be 174 g/L.

The VOC composite partial pressure is estimated as < 1 mm Hg.

Based on the RTU dilution of 1:256 the VOC is .68 less than 1.



21. **SGS U.S. Testing Company Incorporated**

28 Day Shake Flask Ready Biodegradability Test vs Soysoap

This study was conducted in compliance with the United States Environmental Protection (EPA) Good Laboratory Practices, as described in 40 CFR, Part 792.

Conclusions Summary: Biodegradability – Co2 Evolution / TOC Reduction

Substance	Degradation from Co2 Evolution,	from TOC Reduction
Soysoap	71.3%	84.6%
Aniline Control	86.3%	100%

Soysoap satisfied the criteria for Ready Biodegradability as outlined in OECD 301E and USEPA 40 CFR 796.3240. The test substance degraded > 70% by TOC reduction, and >60% by Co2 evolution. The reference control substance, aniline, readily degraded, validating the test system.