Neal R. Stoll, Esq.

UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

March 2, 2011

Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, New York 10036

Re: Proposed Acquisition by Ecolab Inc. of O.R. Solutions. Inc. (Durwood Faries, Jr.)
File No. 111 0028

Dear Mr. Stoll:

The Commission has conducted an investigation to determine whether the proposed acquisition by Ecolab Inc. of O.R. Solutions, Inc. may violate Section 7 of the Clayton Act or Section 5 of the Federal Trade Commission Act.

Upon further review of this matter, it now appears that no further action is warranted by
the Commission at this time. Accordingly, the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred.

Although the Commission has determined