



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 25, 2020

Kevin R. Kutcel
Agent
OdorStar LLC.
4041 SW 47 Ave.
Fort Lauderdale, FL 33314

Subject: Label Amendment – Addition of use directions and modification of other use directions
Product Name: NOSGUARD SG
EPA Registration Number: 87508-2
Application Date: October 8, 2019
Decision Number: 545531

Dear Mr. Kutcel:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Melanie Bolden by phone at (703) 347-0165, or via email at Bolden.Melanie@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Wanda G. Fuller, for". The signature is written in a cursive style.

Demson Fuller, Product Manager 32
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

NosGUARD^{SG}

Deodorizing (vapor) delivery system (pouch) for the generation of chlorine dioxide for use (as control of) (to kill) (to eliminate) odor-causing bacteria, mold and mildew and chemical odors in un-occupied confined spaces; automobiles (Cars, Trucks, RV's, Trailers), commercial storage and refuse containers, boat cabins and porta-potties [list use site] where moisture is present.

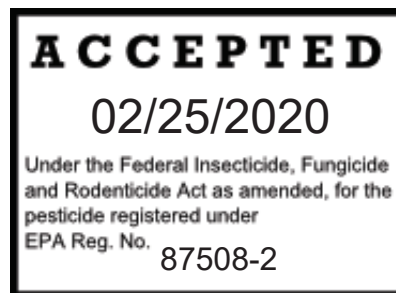
ACTIVE INGREDIENT: Sodium Chlorite..... 16%
OTHER INGREDIENTS:.....84%
Total100%

Available Chlorine.....25%

KEEP OUT OF REACH OF CHILDREN
CAUTION

See full directions and first aid [inside package] (on) [back/side/top/bottom/inside label] [panel/label/booklet]. [See back for directions.]

CONTAINS
[Net Weight: [X.XX oz. (g)]]



FIRST AID

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give mouth to mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call (800) 327-8583.

MANUFACTURED BY:

ODORSTAR®, LLC

4041 S.W. 47th Ave.

Ft. Lauderdale, FL 33314

(800) 327-8583 • Made in U.S.A.

[Visit [our website] [starbrite.com] *insert company website*

Visit [*company's*] website at *insert company website*

ASK OUR EXPERTS *insert company website*

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes moderate eye irritation. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic invertebrates. Do not contaminate water with this product.

PHYSICAL OR CHEMICAL HAZARDS: This product contains an oxidizing agent. Do not mix with acids or chlorine. Avoid any contact with flame or burning materials. Once this product is activated with water, it will produce dangerous levels of chlorine dioxide gas. Chlorine dioxide gas is a strong oxidizing agent and is irritating to the respiratory tract. The symptoms of chlorine dioxide intoxication depend on its concentration and on the exposure time; they include lacrimation, headache, vomiting, severe cough, asthmatic bronchitis, dyspnea and even death. Do not inhale chlorine dioxide. Exposure to high concentrations of chlorine dioxide can cause death; do not allow unprotected persons to be exposed to chlorine dioxide gas

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store this product in the original unopened packaging until ready for use. Store in a cool, dry, well-ventilated area away from heat or open flame. Store in an area that is inaccessible to children.

EMERGENCY HANDLING: In case of spill, contamination or decomposition, do not reseal package. If possible, isolate package and discard it in open and well-ventilated area.

DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Dispose of accumulated liquid (if any) and discard empty foil pouch and spent white pouch in an outdoor refuse container.

Directions For Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Recommended dosage is at a rate of 1 gram per every 100 ft³ for everyday smells. For heavy-duty odors, use 2-2.5 grams per every 100 ft³, or refer to the below chart for specific use site recommendations.

Pouch Size	Approx. Dimensions	Approx. Volume	Example Area
5 Gram	10' H x 10'L by 5'W	500 ft ³	Small cars Small boats Trash cans Porta-potties
10 Gram	10' H x 10'L by 10'W	1000 ft ³	Sedans Boats Dumpsters
25 Gram	15' H x 15'L by 10'W	2250 ft ³	SUVs Large boats Small RVs
50 Gram	15' H x 15'L by 20'W	4500 ft ³	RVs Storage Containers Shipping Containers

OPTION 1 – SLOW RELEASE:

- Read entire label before using this product.
- People and pets must not be in the area undergoing treatment while product is activated. Use the enclosed caution placard to record treatment/safe re-entry time.
- Ventilate (and turn on lights) for one (1) hour before re-entry.

WHEN TO USE: Use [product] (Slow Release System) to eliminate (kill) (control) mold and mildew odor(s) and other foul smells from forming.

HOW TO USE: Remove contents from the plastic (clamshell) container. Open silver foil packet and remove white pouch. **DO NOT OPEN WHITE POUCH.**

Place the white pouch into the (clamshell) container. Close container and place (hang) it (on a stable, level surface) in a central location (with the holes facing up). (You may also use the tape strips on the back of the clamshell to adhere to a wall.) Repeat treatment [seasonally] [before (winter) (long-term) storage] [before odors reappear].

OPTION 2 – FAST RELEASE

- Read entire label before using this product.
- People and pets must not be in the area undergoing treatment while product is activated. Use the enclosed caution placard to record treatment/safe re-entry time.
- If applicable, turn on air conditioning or ventilation to circulate air. (Turn off lights.)
- Allow at least 4 to 6 hours (or overnight) for the system to work.
- Ventilate (and turn on lights) for one (1) hour before re-entry.

HOW TO USE: Remove contents from the plastic (clamshell) container. Open the silver foil packet and remove the white pouch. (**DO NOT OPEN WHITE POUCH.**)

- Saturate sponge with water. Slide end of the white pouch that has square indentations into the slit of the sponge and place it back into the plastic container. Snap the container securely closed (and place it on a stable, level surface in a central location with the holes facing up. (Do not hang the container.)

-OR-

- Place the white inner pouch(es) with the indentations side down in a(n) (plastic cup) (tray) (container) (air mover) filled with 1.5" inches (3.8cm) of water.

-OR-

- **(When using with Hanging Accessory)** Place the provided “cup” into the plastic clamshell container as shown in the illustration below. [ILLUSTRATION] Place white inner pouch into the cup and snap the clamshell securely closed. Use the provided hanger to deploy the closed clamshell as shown in the illustration below. [ILLUSTRATION] Do not shorten the hanging cord.

Repeat treatment if odors reappear.

COVERAGE AREA: Use one pouch per (area)(room)(container)(vehicle) for everyday smells. When using multiple pouches (for heavy-duty odors), place strategically for even coverage of the (area)(room) (container)(vehicle).

SPECIFIC USE DIRECTIONS:

Outside Storage Containers (Small Storage Containers, Commercial Storage Containers, Commercial Shipping Containers, Sheds)

Place the unit in an open area.

Outside Waste & Refuse Containers (Commercial Trash Cans, Receptacles, Dumpsters)

Place the unit in, above or adjacent to the trash can or dumpster.

Porta-Potties

Place the unit near the center of the porta-potty in an open area, and out of reach of children and pets.

Boat Cabins -or- Recreational Vehicles (RVs)

Place the unit near the center of the (cabin) (vehicle) (interior) in an open area out of reach of children and pets.

Open any doors, cabinets and drawers that require treatment.

Automobiles -or- Vehicles (Cars, Trucks, Trailers-)

Place the unit near the center of the car (vehicle) (truck) (trailer), on a stable, level surface—such as an armrest or on any other central location—with holes facing up. Open glove box or any compartments that require treatment. Close doors and windows.

Hotel [Hospitality] Rooms

Place back into the plastic container. Snap the container securely closed and place on a stable, level surface in the middle of the room with the holes facing up. Close drapes, turn off air conditioning (or other ventilation), and open any doors, cabinets or drawers that require treatment, including the bathroom door. Allow at least 4 hours for treatment to work. People and pets must not be in the room during treatment. Limited re-entry during treatment is OK. (Hang included sign on door to indicate treatment time.) Upon re-entry, turn on air conditioning (or available ventilation) and open windows if able to do so. Allow 1 hour to ventilate room before occupying. Room will smell clean and fresh.

Commercial Buildings, Retail and Industrial Centers, Indoor Agricultural Facilities and Greenhouses, and Residential Properties (That Are Undergoing Water, Smoke, Forensic Restoration, Sewer Back Up, Odor Control Or Other Restoration Services)

(Remove all odor source and clean all heavily soiled surfaces prior to using [Product].) (Follow all PPE recommendations for areas undergoing restoration.) Determine appropriate number of packets based on cubic foot calculation and odor severity. Cover [(CO₂ generators) (and) (smoke detectors) (using plastic bags and masking tape)]. If there is a ventilation system is dedicated solely to the space being treated, set for recirculation. Otherwise, turn off system and close duct(s). Place (Product) no closer than 18" to 24" (45 to 60cm) away from fabrics, leather, electronics, mirrors, metals or plated surfaces. Use an (air mover) (fan) to increase circulation and distribute gas. [Use of (fan) (air mover) increases ventilation and provides better coverage. (Follow manufacturer's directions when using with a device)]

Additional Use Sites:

Greenhouses, hydroponic facilities, indoor & outdoor agricultural facilities, distilleries, wineries (not for use with/on plants/crops/feed).

Commercial buildings, retail and industrial centers, and residential properties (that are undergoing water or smoke restoration, sewer backup, odor control, or other restoration services).

DEODORIZATION APPLICATIONS

DEODORIZING TREATMENT OF VENTILATION SYSTEMS:

This product can be used as a deodorizer in ventilation systems to eliminate (chemical) (musty) (unpleasant) odors. Before activating the product, make sure the ventilation systems are turned off (disconnected) or set to

recirculation. Remove all loose soil and debris and clean all duct work by using a commercial duct cleaning system or service prior to deodorizing. Ensure all parts are mechanically sound, free of leaks, and other defects before and after treatment. Follow directions for use on the label to activate the product. Do not exceed 500 ppm. Allow 1 hour to ventilate prior to re-occupation. Dispose of spent white pouch in an outdoor refuse container. Follow all precautionary and first aid instructions on package label.

Additional Marketing Claims:

1. AUTO ODOR ELIMINATOR
2. ELIMINATES & PREVENTS (Mold & Mildew Odors) (FOUL ODORS)
3. DEODORIZING DELIVERY SYSTEM
4. (Not an) (More than an) Air Freshener
5. Actually Removes Foul Odors Caused by (Cigarettes) (Cigars) (Food) [and] (Pets)
6. [Removes] [Eliminates] [Works on] [Deodorizes] (smoke) (food) (pet) (cigarette) (vomit) (urine) (rotten food) (mold) (mildew) (fish) (skunk odor) (and) (other foul) smells
7. DEEP PENETRATING VAPOR ACTION
8. Removes foul odors from (car) or (truck interiors) from (cigar) or (cigarette smoke), (spoiled food), (pet odor), or (musty mold or mildew odors)
9. One unit will treat most cars or SUV's
10. CAR ODOR ELIMINATOR
11. BOAT ODOR ELIMINATOR
12. FOR PROFESSIONAL USE BY CULTIVATOR/ RESTORATOR/ TECHNICIAN/ CONTRACTOR/ VETERINARIAN/ CLINICIAN/ INSTALLER/ BUILDER
13. RV ODOR ELIMINATOR
14. Works [in] [as little as] (Overnight) (4-6 hours) (4 hours)
15. Removes Smoke, Food, Pet, and other Foul Smells
16. One unit will treat most cars and SUVs
17. Mold & Mildew Odor Control
18. A great way to deodorize the interior (after a fishing trip) (in a used car) (from) (alcohol) (cigar), (bait), (vomit), (puke) (throw up) (urine) (bodily fluid odors) (agricultural odors) (manure odors) (rotting plant odors) (hay smell) (farm odors) and (rotten) (spoiled) (decaying) (food smells) odors or to freshen the interior (before a dinner cruise).
19. ClO₂ (chlorine dioxide) deodorizer
20. Deodorizer
21. Deodorizes
22. (Auto) (car) (truck) (cabin) (boat) (storage container) deodorizer
23. Odor remover
24. Odor control system
25. (Do it yourself) (DIY) [no expensive machines (machinery) required]
26. Deep penetrating [(ClO₂) (chlorine dioxide)] [(vapor) (gas)] (action)
27. Removes residual odors
28. Ideal for long term storage
29. Ideal for use in (boats), (RVs), (Autos) & (Storage) (Containers)
30. Formulated to quickly control & Eliminate Mold/Mildew Odors & Other foul smells.
31. Take control
32. Own odor
33. Fast, Easy, Effective
34. Frequent (regular) use formula
35. Great for frequent use
36. [Controls] [Kills] [Eliminates] (tough) odors caused by (bacteria) (mold) (mildew).
37. [Controls] [Kills] [Eliminates] (tough) pet odors (caused by bacteria)
38. [Controls] [Kills] [Eliminates] odors caused by mold and mildew
39. Eliminates (removes) (tough) odors (caused by) (bacteria) (mold) (and) (mildew)
40. Gets to the heart of (tough) odors
41. Odor fighter
42. (Perfect for eliminating) (eliminates) tough odors at their source
43. (This product) Eliminates (tough) odors at their source

44. (This product) prevents odors at their source caused by (bacteria) (mold) (mildew)
45. (This product) (is specially formulated to) eliminate odors from) {insert use sites}
46. To eliminate odors use (this product) around {insert use sites}
47. Provides immediate relief from mold odor or other foul odors.
48. Ideal when you open the boat up from winter storage to remove any lingering musty smells.
49. For best results, replace when odors reappear
50. The quick release, deep-penetrating vapor thoroughly and completely permeates the treated area to remove unpleasant odors.
51. For use throughout the year, or to prevent the formation of foul odors, use [NosGUARD^{SG} Mildew Odor Control Slow Release Bags][PRODUCT].
52. Not an Air Freshener; Actually Controls Odor-Causing Bacteria, Mold and Mildew Odors
53. Molecularly eliminates odors (at their source)
54. [Eliminates -or- Eliminating] odors with science
55. Not just a (cover-up) (perfume) (air-freshener) (fragrance)
56. Does not just mask odors
57. The ClO₂ (Chlorine dioxide) breakthrough technology (that controls odor-causing bacteria, mold and mildew and chemical odors) (that eliminates odors) (at their source)
58. Patented vapor delivery system
59. Patented (odor eliminating) technology (eliminates odors)
60. Neutralizes odors
61. Remove foul odors caused by mold and mildew, cigar or cigarette smoke, spoiled food and other foul, musty smells.
62. Slow Release System – [This product] is designed to maintain air quality (while preventing the formation of future foul odor)
63. Fast Release System – [This product] is designed to provide immediate relief from (mold) odor (or other foul odors)
64. Formulated for professional [cultivator(s)]/ [(restoration contractor(s)) use
65. Formulated for the professional (cultivator)(restoration)(contractor)
66. No strong (heavy) perfumes (or residual odors) after ventilation
67. Leaves no visible (sticky) residue
68. The future of [odor control] [fresh]
69. Product works by oxidation, not by masking of odors.
70. Eliminates odors caused by fire smoke, tobacco smoke, musty odors, stale-cooking odors.
71. Leaves a fresh, clean scent
72. Cleans the air (you breathe)
73. Water-Activated
74. Humidity-activated
75. Gas Formula Packet
76. Smart Generator
77. Will not harm most vehicle interiors
78. Will not harm -or- Safe to use around [common vehicle interiors] [leather, vinyl, wood (inlay), carpeting, upholstery, glass, plastic]
79. No added [perfumes] [and] [or] [dyes] [and] [or] fragrance
80. No fragrance added
81. Fresh Scent
82. Clean Scent
83. Leaves a fresh, clean scent
84. No harsh (lingering) -or- smell –or odor -and/or- build-up after ventilation
85. No rinsing
86. [Compatible with -or- Suitable] [for use on] equipment surfaces
87. Compatible with -or- Suitable –for use on [insert use site] surfaces
88. Great for [commercial] [fleet] use
89. Just Add Water
90. [The answer to][dominate][The solution to] mold and mildew (odor-causing bacteria) (chemical) odors
91. ClO₂-Based Technology
92. Mold & Mildew Odor Eliminator
93. The Science of Smell
94. Five Star Fresh
95. No Volatile Organic Compounds (VOCs)
96. Reduces downtime (in restoration services)

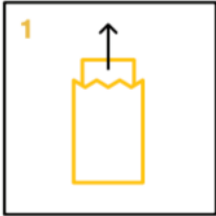
[Eliminates/prevents/controls (Specific) Odors:]

Smoke, Fire & Soot
 Water Damage
 Mold & Mildew
 Forensic
 Animal Waste
 Cigarettes
 Chemicals

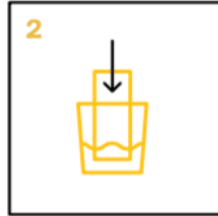
Food Fuel
 Pepper Spray
 Perspiration
 Sewage
 Skunk
 Tear Gas
 Tobacco

Waste Containers
 Urine
 Paint odors
 Human Waste
 Grease Traps

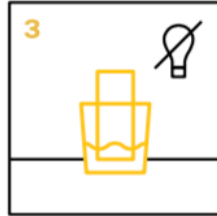
Packaging Graphics:



Open the silver foil packet and remove the white pouch (DO NOT OPEN THE WHITE POUCH).



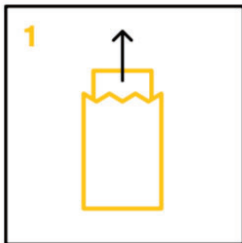
Place the end of the white pouch that has the square imprint into a plastic cup filled with 1.5" of water.



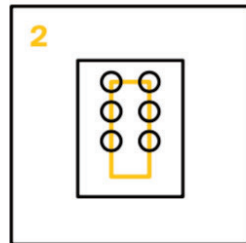
Place it on a stable, level surface in a central location and turn off the lights.



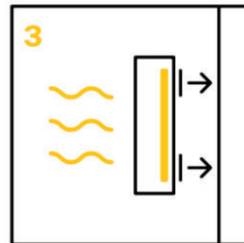
Allow at least 4-6 hours for the system to work.



Tear open this foil packet and remove the inner white pouch (DO NOT OPEN THE WHITE POUCH).



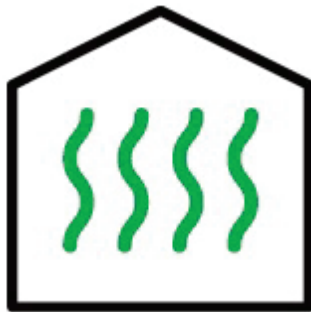
Insert the white inner pouch into the clamshell.



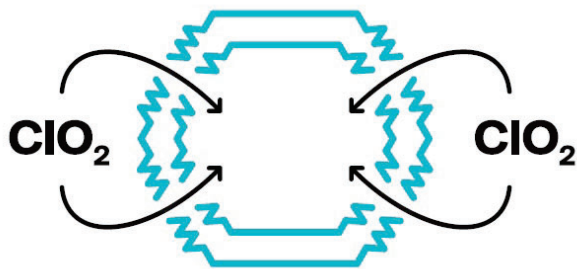
Snap the clamshell securely closed and place on a stable, level surface. You may also use the tape strips on the back of the clamshell to adhere to a wall.



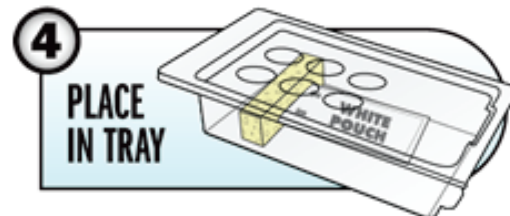
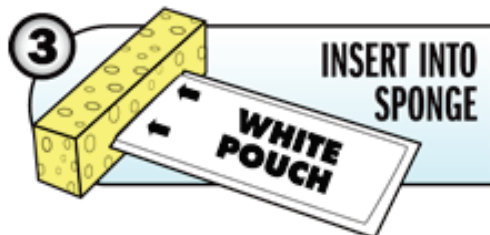
Gas Formula

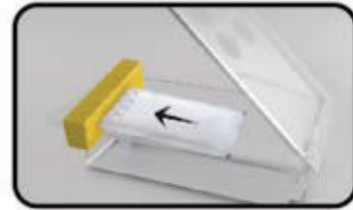


Gas Treatment



Odor Oxidation Graphic





Cigarette, Food, Pet odors



FOR USE IN:



CAR



BOAT



RV

Placards:

 <p>DANGER DO NOT ENTER Chlorine Dioxide Gas Treatment in Progress VENTILATE FOR ONE (1) HOUR BEFORE RE-ENTRY</p>	<p>DANGER</p> <p>TREATMENT START TIME: _____</p> <p>TREATMENT END TIME: _____</p>
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