

4091-12

5/4/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Michael S. Cooley
Associate General Counsel
W.M. Barr & Company, Inc.
P.O. Box 1879
Memphis, TN 38101

MAY -4 2011

Subject: **Miltrol**
EPA Registration Number 4091-12
Notification Application Dated April 7, 2011
EPA Received Date April 8, 2011

Dear Mr. Cooley:

This will knowledge receipt of your notification, submitted under the provisions of FIFRA section 3c 9. Based on a review of the submitted material the following comment apply.

Proposed Amendment:

- New marketing claims: "Antimicrobial" and "Make the Clean Last Longer"

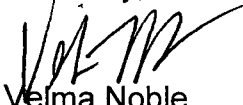
General Comments:

Based on a review of the material submitted, the following comment apply:

The notification is acceptable. A copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL								
SURNAME								
DATE								



United States
Environmental Protection Agency
Washington, DC 20460

Registration
Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 4091-12	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Miltrol	PM# Team 31	
5. Name and Address of Applicant (Include ZIP Code) W.M. Barr & Company, Inc. P.O. Box 1879 Memphis, TN 38101 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of several new marketing claims per PR Notice 98-10.

Please refer to the attached cover letter for additional information.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Natalie Bennett	Title Paralegal, W.M. Barr & Co	Telephone No. (Include Area Code) 901-334-4399
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		E. Date Application Received (Stamped)
2. Signature 	3. Title Associate General Counsel	
4. Typed Name Michael S. Cooley	5. Date April 7, 2011	

3049



April 7, 2011

Via Federal Express

Document Processing Desk (NOTIF)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

To: Velma Noble (7510P)
Product Manager 31
Regulatory Management Branch I

Re: Registrant: W.M. Barr & Company, Inc.
Product: Miltrol (EPA Reg. No. 4091-12)
Notification per PR Notice 98-10

Dear Ms. Noble:

We are notifying the EPA of several new marketing claims per PR Notice 98-10. We believe that these claims are consistent with the language on the approved label. Specifically, these are:

- 1. Antimicrobial
Comment: This claim is the pesticide category per PR 98-10 (II.K.1).
- 2. Make the Clean Last Longer
Comment: This is a portion of wording already approved. "When you clean mold and mildew you can make the clean last longer with [Miltrol] [Mold Armor® Mold Blocker] [DampRid® Mildew & Mold Blocker]."

Attached is one copy of the label with the changes highlighted- those changes that must be made by notification are highlighted in yellow; those changes that were made by nonnotification are highlighted in grey. Also attached are three clean copies of the label.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under

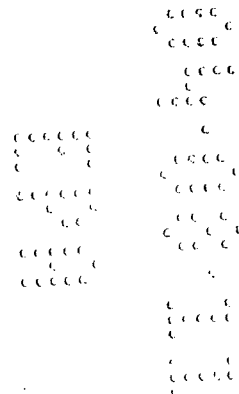
sections 12 and 14 of FIFRA.

Please contact either Natalie Bennett at 901-334-4399 or Mike Cooley at 901-775-5480 if you have any questions.

Sincerely,



Natalie Bennett
Paralegal
W.M. Barr & Company, Inc.



6089

MASTER LABEL

OPTIONAL MARKETING LANGUAGE

Now there is a fast, easy and affordable solution to fighting mold and mildew problems. Mold Armor® is the product line dedicated to finding, cleaning, and preventing mold and mildew on the inside and outside of your home. Renew and restore your home's beauty with Mold Armor.

OPTIONAL GENERAL CLAIMS

- For use in Bathrooms
- For use on Non-Food Contact Kitchen Surfaces
- For use on Linens
- For use on Draperies
- For use on Fabrics
- For use on Apparel
- For use on Carpets
- For use on Bedding
- For use on Upholstery/Furniture
- For use on Roofs
- For use on Air Filter Materials

Prevents Mold and Mildew Stains and Odors
Evita las manchas y olores do moho y humedad

Prevents

Prevents Mold Growth

Prevents Mold and Mildew Growth and Odors

Antimicrobial

Water-Based & Odor Free

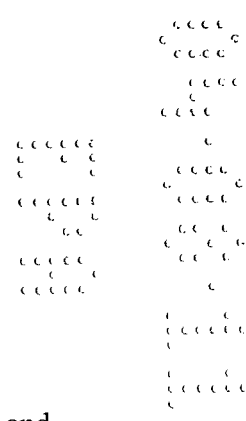
Creates an invisible barrier to inhibit the growth of mold and mildew

Creates an invisible barrier to the growth of mold and mildew

INVISIBLE BARRIER to the growth of mold and mildew
BARRERA INVISIBLE contra el desarrollo de
moho y manchas de humedad

Invisible Mold Barrier

Mold Blocker creates an invisible barrier to the growth of mold to keep indoor and outdoor surfaces mold free for up to 3 months.



MASTER LABEL

Protection indoors and out!

Indoor & Outdoor Use Plus Fabrics!

3 MONTH

Make the Clean Last Longer

Miltrol provides protection from mold and mildew staining when properly applied. Miltrol establishes a barrier between most household non-porous surfaces and bacteria and mold/mildew that cause odor, staining, and discoloration.

When you clean mold and mildew you can make the clean last longer with [Miltrol] [Mold Armor® Mold Blocker] [DampRid® Mildew & Mold Blocker]. [And, it's guaranteed effective.]

Spray Miltrol on glazed tiles, tub, shower curtains, shower stalls, sinks, wall paper for non-contact surfaces, window sills, cabinets, garbage cans, appliances, and vanity tops weekly to replenish barrier. Use on clothing, bedding, upholstery, and drapes. Great for roofs. Reapply every 3 months.

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

CAUTION: Harmful if inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Avoid contact with eyes and skin. Wash with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID

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

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

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. 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 a poison control center or doctor.

DIRECTIONS FOR USE:

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

Bathroom and Non-Food Contact Kitchen Surfaces

Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable

MASTER LABEL

walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, exteriors of appliances, refrigerator exteriors, fiberglass, Formica, glazed porcelain, synthetic marble, plastic vinyl.

SPRAY: Shake well. Using trigger pump sprayer, spray entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand for 3 minutes and wipe dry with clean cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply every three months or when odor, staining, and discoloration due to bacteria, mold stains, or mildew stains return.

Linens, Draperies, Fabric and Apparel

Bed sheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel Gackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos), and fabrics made out of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orion, polyester, polyethylene, polypropylene, rayon, silk, spandex, vinyl, and wool.

SPRAY: Clean surface prior to application. Shake well. Using trigger pump sprayer, spray entire surface area 4" -6" from the surface making sure the surface is completely covered. Let stand until dry or let stand for 3 minutes and wipe dry with clean cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and colorfastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply every three months or when odor, staining, and discoloration due to bacteria, mold stains, or mildew stains return.

Air filters and filter material for furnaces, air conditioners, air purification systems, automobiles, recirculating air handling systems, vacuum cleaner filters, and aquariums.

SPRAY: When treating filters, remove filter from unit. Shake well. Using trigger pump sprayer, spray entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply every three months or when odor, staining, and discoloration due to bacteria, mold stains, or mildew stains return.

Carpet

SPRAY: Apply to clean carpet. Shake well. Using trigger pump sprayer, spray entire surface area 4"-6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add product directly to cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness offabric by treating and drying a small concealed area prior to application. Miltrol treats approximately 200 sq. feet per gallon. When treating coarser substrates (e.g., wool carpeting), more Miltrol may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply every three months or when odor, staining, and discoloration due to bacteria, mold stains,



MASTER LABEL

or mildew stains return.

Bedding, Upholstery/Furniture

Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, wool, and fiberfill to be used in upholstery, sleeping bags, apparel where the fiber is cotton, natural down, nylon, rayon, or wool.

SPRAY: Clean surface prior to application. Shake well. Using trigger pump sprayer, spray entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply every three months or when odor, staining, and discoloration due to bacteria, mold stains, or mildew stains return.

STORAGE AND DISPOSAL: Nonrefillable container. Do not reuse this container. Offer for recycling, if available.

Questions? Comments?

Call [1-800-398-3982] [1-888-326-7743] [1-888-DAMPRIID (326-7743)]
[in U.S.A. only from 8am - 4:30 pm CT Monday through Friday or online]
[or online at]
[www.moldarmor.com] [www.damprid.com]

W.M. Barr and Company, Inc.
[PO Box 1879]
Memphis, TN 38101
[An Employee Owned Company]
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NON-FIFRA RELATED ELEMENT

From the makers of DampRid@

By Miltrol

Waterproof

BATCH CODE: _____

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