

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

January 27, 2021

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Megan Polos Agent W.M. Barr & Company, Inc. 6750 Lenox Center Court, Suite 200 Memphis, TN 38115

Subject: Notification per PRN 98-10 – Addition of marketing/packaging related claims and made in USA statement Product Name: FGO EPA Registration Number: 4091-15 Application Date: July 2, 2020 Decision Number: 570074

Dear Ms. Polos:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

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) lists 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 Assurance.

If you have any questions, you may contact Wanda Henson at (7030 308-6345 or via email at <u>henson.wanda@epa.gov</u>

Sincerely,

Warda,

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

FG0

[Deodorizer][and][Fungistatic[‡]][and][Mildewstatic[‡]] [Agent]

{the following will be used if the above statement appears on a container label:} [‡]For aesthetic purposes only

| Active Ingredient: | |
|--------------------|-------|
| Calcium chloride | 78 % |
| Other Ingredients: | 22 % |
| Total | 100 % |

KEEP OUT OF REACH OF CHILDREN CAUTION

See Side/back panel for additional precautions

NET CONTENTS: X oz. or lbs. (Y g or kg) {option for packages with spill guard} _____ oz. or lbs. DampRid _____ oz. or lbs. [spill] [guard] [material][absorbent] _____ oz. or lbs. Total

{For hanging bag containers with limited label (see page 11):} Retain this package for Directions for Use, Precautionary Statements, and Storage and Disposal while product is in use.

EPA Reg. No. 4091-15____

EPA Est. No.

{If multiple EPA Est. Nos. listed:} See [back][side][bottom][top] for EPA Est. No. in Lot code

NOTIFICATION

4091-15

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

01/27/2021

{OPTIONAL MARKETING LANGUAGE}

FG0 eliminates excess moisture in the air and prevents damage caused by moisture. FG0 also eliminates the unpleasant, musty odor caused by mildew growth and acts as a [fungistatic] [and] [mildewstatic] agent for aesthetic purposes only. [FG0] attracts and traps excess moisture to eliminate musty odors and leave fresher air.

[FG0] [It] won't dry the air excessively to damage plants, furniture, or household goods. FG0 can be used in {insert optional use sites, below} or anywhere that excess moisture and [stale] [stagnant] air are a problem [-or- nuisance].

And our exclusive Moisture-Lock[®] technology combines a spill resistant safety cover and a natural absorbent media in the bottom of the pail to resist spills.

Great for {see list of optional use sites, below}.

FG0 eliminates excess moisture that can cause damp-feeling fabrics and even damage your clothes and leather goods. FG0 also eliminates the unpleasant, musty odor caused by mildew growth, [and acts as a [fungistatic] [and] [mildewstatic] agent for aesthetic purposes only].

FG0 is so effective at removing moisture, it's patented.

FG0 eliminates excess moisture in the air and musty odors caused by mildew growth, [and acts as a [fungistatic] [and] [mildewstatic] agent for aesthetic purposes only] and creates fresher, cleaner air! FG0 eliminates musty air. The Refillable Moisture Absorber can be used in any room in the house, in {see list of optional use sites below} and anywhere else excess moisture and [stale] [stagnant] air are a nuisance.

For use in any refillable moisture absorbing container** **Follow manufacturer's instruction

[FG0 Easy-Fill[®] System Large Room Absorber][FG0 Any Room Moisture Absorber] eliminates musty odors caused by mildew growth and eliminates excess moisture occasionally found in [stale] [stagnant] air [and acts as a [fungistatic] [and] [mildewstatic] agent for aesthetic purposes only]. It is convenient and quick to refill using 2 Easy-Fill[®] 10.5 oz Refill Packs. It is tip and spill resistant. Use in {see list of optional use sites below } and enclosed spaces where excess moisture and [stale] [stagnant] air are a problem.

{Optional Marketing/Packaging Related Claims:} Empties easily, like a pitcher. Neat & easy to dispose & refill. Locking lid reduces potential exposure to children & pets. Locking lid to prevent inadvertent exposures and releases. Spill resistant lower chamber traps moisture. Moisture Absorber Attracts and Traps Excess Moisture Eliminates Musty Odors Creates Fresher Air For Fresher Indoor Air Hanging Moisture Absorber

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}
{All text in braces {xxx} is administrative communication & will not appear on a printed label.}
{The words "this product" may be used in place of product name}

Easy-Fill[®] System Refill/Refills Available/Moisture Absorber Refill Refillable bucket Tamper-resistant lid Tamper & spill Resistant Protects Against Moisture Damage Septic Safe Will not harm septic systems Large/Any Room Removes tough odors Moisture-Lock® spill resistor technology with sealed safety cover Replace when dark Moisture-Lock® absorber reaches red arrow See it work[!] Hanging Bag [Refillable] [Disposable] [Hi-Capacity] [bucket] [tub] [Multi] {or insert number }[2][3][4] pack [Moisture Lock[®] Spill resistor technology with sealed safety cover] {One of the following may be used based on container size}: Lasts up to 6 months Lasts Up To 45 Days[†] Lasts Up To 60 Days[†] [†] Duration will vary based on temperature and humidity {for Mega Refillable only} Lasts up to 6 months [Refill][2x][per][year] [Refills Available] Fragrance free refill crystals [are] available in [an economical,] [XX oz.,] [XX lb.][multi-use] [reclosable] [bag] [bottle]. Super Refill 10% More Moisture Absorbing Power¹ Bonus – 1 Free Bag

{Optional packaging related graphics}



¹ Compared to 14 oz. bag [of this product]

{All text in brackets [xxx] is optional & may or may not be included on a printed label.} {All text in braces {xxx} is administrative communication & will not appear on a printed label.} {The words "this product" may be used in place of product name}





{OPTIONAL GENERAL CLAIMS}

- [inhibits] surface-damaging [mold][and][mildew][in][on] {see list of optional use sites below}
- Inhibits mildew staining [and musty odors]
- Creates conditions in which mildew stains [and musty odors] will not occur

[List of Optional Use Sites] [Suggested Uses] [Great for] {may be used in singular or plural form on market label}

- Bathrooms
- Basements
- Pantries
- Kitchens
- Kitchen Cabinets
- Linen Closets
- Closets
- Bedrooms
- Living Rooms
- Bedroom Closets
- Clothes Closets
- Coat Closets
- Laundry Rooms
- Storage Closets
- Storage Lockers
- Safes
- File Rooms
- Garages

{All text in brackets [xxx] is optional & may or may not be included on a printed label.} {All text in braces {xxx} is administrative communication & will not appear on a printed label.} {The words "this product" may be used in place of product name}

- Attics
- Crawl Spaces
- Work Rooms
- Tool Sheds
- Storage Sheds
- Gym Lockers
- Boat Lockers
- Cuddies
- Stored Boats
- Offices
- Entry Rooms
- Mud Rooms
- Stored RVs
- Recreational Vehicles (stored)
- Lockers
- School Lockers
- Second Home
- Cabin
- Beach House
- Entry Ways
- Foyers
- any enclosed room
- [Small] enclosed spaces [with little ventilation]

{Optional Use Site graphics:}



{OPTIONAL MILDEWSTATIC CLAIMS}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.} {All text in braces {xxx} is administrative communication & will not appear on a printed label.} {The words "this product" may be used in place of product name}

- Inhibits Mold and Mildew Stains [and Musty Odors]
- [Inhibits] [Mold][Mildew][Mold and Mildew][Growth] [that causes][Odors][Stains][Surface Damage]
- Creates conditions in which [mold][mildew] staining will not occur
- [Inhibits] the growth of damaging mildew caused by excess moisture.
- The key to mold [mildew] control is moisture control
- Mold growth is inhibited [-or- slowed] when humidity is low
- FG0 reduces humidity to a level that inhibits mold growth

{OPTIONAL FRAGRANCE CLAIMS/GRAPHICS}

• Fragrance Free



{INTRODUCTORY CLAIMS – will only appear on graphic label for the first 6 months the product is on the shelf.}

• New

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye and skin irritation. Harmful if swallowed, absorbed through the skin or inhaled. Avoid contact with eyes, skin or clothing. Avoid breathing dust. Wear eye protection, gloves, long sleeve shirt, and pants when handling product outside of its container. 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.

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 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. Do not give anything to an unconscious person.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably 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.

DIRECTIONS FOR USE:

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

[FG0 efficiently removes moisture from the air.] [It works most efficiently in closed areas and places that remain that way for long periods of time such as closets, cabinets, storage containers and cabinets, pantries, coolers, and vehicles in storage.] The effectiveness of FG0 will be compromised in well ventilated spaces. Do not use this product in moving vehicles.

{All graphics below are optional, and do not take the place of the text. Graphics are intended to aid user in proper use and disposal of product}

{Hanging Moisture Absorbers:}

[Remove from carton and discard clear plastic wrapper. Do not discard [outer][cardboard] package while product is in use. Unfold and hang with enough space to allow air circulation. Replace when all the white crystals have dissolved.]



{Disposable Moisture Absorber:}

[Remove lid and peel off foil cover leaving white safety cover in place. Replace grill lid. Place on a flat surface in the desired location. Crystals will harden and dissolve in up to 45 days.] [Replace when all white crystals have dissolved]



{Refillable Moisture Absorbers and Moisture Absorber Refills:}

[Remove lid. Open bag by tearing or cutting. Pour crystals into canister. Replace lid. Place on a flat surface in desired location. Crystals will harden and dissolve as they absorb moisture.] [Refill as directed [below] when all [white] crystals have dissolved.]

{For refill container/bag}

When all white crystals have dissolved in the Refillable Moisture Absorber container, it may be refilled [with this product] after emptying according to its label.

Shake refill bag. Open refill bag by tearing or cutting. Pour crystals into refillable container filling 1" from top. Reclose bag.

{All text in brackets [xxx] is optional & may or may not be included on a printed label.} {All text in braces {xxx} is administrative communication & will not appear on a printed label.} {The words "this product" may be used in place of product name}



{for bottle:}

When all white crystals have dissolved in the Refillable Moisture Absorber container, it may be refilled [with this product] after emptying according to its label.

Shake bottle before pouring while holding closed. Pour crystals into Refillable Moisture Absorber container, filling [about -or- approximately] 1" [inch] from the top. Reclose bottle.



{Hi-Capacity Moisture Absorber:}

[Remove lid to activate product. Leave safety cover in place. Place on a flat surface in the desired location. The [Calcium Chloride] crystals will harden and then dissolve as they remove moisture from the air.] [Discard [and replace] when crystals have completely dissolved and the dark Moisture-lock absorber reaches the red arrow]



 $\{or\}$

{All text in brackets [xxx] is optional & may or may not be included on a printed label.} {All text in braces {xxx} is administrative communication & will not appear on a printed label.} {The words "this product" may be used in place of product name}



{Mega Refillable Moisture Absorber:}

Remove lid. Do not remove safety cover from lid. Open bags [by cutting]. Pour crystals evenly into tray. Replace lid. Place on flat surface in desired location. As crystals absorb moisture they harden and drop liquid into bottom chamber. [NOTE: Crystals start working immediately to attract and trap moisture but it may take up to 2 weeks to see liquid dripping into bottom.

[Refill as directed [below][in Storage and Disposal] when [all] [white] crystals have dissolved.]





[For faster moisture absorber results (especially after severe storms or hurricanes) remove the layer of paper attached to the inside of the lid. NOTE: Once you remove the paper it cannot be reattached.]

{Easy Fill System:}

[Remove label and release safety latch to open lid. Press side panels to remove top. Remove clear wrapper and place unwrapped packs into upper chamber. Close top with lid open. Press or Push point to close lid. Place product on a flat stable surface.]



To refill Easy Fill System: Empty container and discard used packs according to Storage & Disposal.[Replace][refill] with [fresh][new][refill] packs. Rinse drain port before refilling to reduce potential for clogging.



STORAGE AND DISPOSAL:

Store at room temperature. Do not puncture or remove calcium chloride crystals from containers or packaging [except to refill container].

{Storage and Disposal for container intended to be refilled by the consumer}

{Refillable Moisture Absorber (FG01/cup/pail):}

{MASTER LABEL} {All text in brackets [xxx] is optional & may or may not be included on a printed label.} {All text in braces {xxx} is administrative communication & will not appear on a printed label.} {The words "this product" may be used in place of product name}

During use crystals will dissolve and leave liquid in bottom of container. When liquid reaches full line, open lid and pour liquid into toilet. If refilling, follow Directions for Use on refill container. If not refilling, discard empty container in trash [or offer for recycling [if available]].

{Mega Refillable Moisture Absorber:}

After crystals have completely dissolved, remove tray and empty liquid into toilet and flush. [Refill using] [only] {insert name of DampRid Refill} [products]. If refilling, follow Directions for Use on refill container. If not refilling, discard empty container in trash [or offer for recycling [if available]].

{Easy Fill System:}

Remove top of container, discard used packs in trash. Pour collected liquid into toilet. If refilling, follow Directions for Use on refill [packs][package]. If not refilling, discard empty container in trash [or offer for recycling [if available]].

{Storage and Disposal for containers NOT for refill by the consumer}

{Hanging Bag or other Nonrefillable containers}

Nonrefillable container: Do not reuse these containers. Do not recycle. When all the white crystals are dissolved, discard upright in trash.

{For refill bag or bottle (used only to refill containers)}

Nonrefillable container. Do not reuse or refill this container. Place in trash [or offer for recycling if available].

In case of spills [caused by puncture or damage to the product [or container]]:

<u>Hard surfaces</u> - Wipe up spill with a damp towel. Discard spilled crystals in toilet. Wash towel before reusing.

<u>Carpets</u> - Dry spill as much as possible with a damp towel. Wet spill with cool water and press dry with a dry towel. Repeat as necessary to remove spilled crystals. Discard spilled crystals in toilet. Wash towel before reusing.

<u>Clothing</u> – Hand wash all fabrics with cool water. Do not allow collected liquid to contact leather or metal.

[Manufacturer is not responsible for leaks caused by misuse or spills]

{for hanging bags only} Ice-like crystals that may form in the collection chamber or bag should not be disturbed.

{for refillable containers only} Do not remove liquid from container except to dispose of as directed.

Questions? Comments? [Contact us at] [Call] [1-800-398-3982] [1-888-326-7743] [1-888-DAMPRID (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]

[Made][Sold][Distributed][by][for][:] W.M. Barr and Company, Inc. 6750 Lenox Center Court, Suite 200

{MASTER LABEL} {All text in brackets [xxx] is optional & may or may not be included on a printed label.} {All text in braces {xxx} is administrative communication & will not appear on a printed label.} {The words "this product" may be used in place of product name}

Memphis, TN 38115 [An Employee Owned Company] [© [yyyy] WM Barr & Co., Inc.] [Made in USA]

BATCH CODE:_____

{Label for hanging bag package, where full label is attached to outer container (as sold/distributed) but is not feasible to be attached to container while in use}

FG0

| Active Ingredient: | |
|--------------------|-------|
| Calcium chloride | 78 % |
| Other Ingredients: | 22 % |
| Total | 100 % |

KEEP OUT OF REACH OF CHILDREN CAUTION

See package [-or- carton] for Precautionary Statements, Directions for Use, and Storage and Disposal

EPA Reg. No. <u>4091-15</u> EPA Est. No. <u>{to be inserted on container label}</u> {If multiple EPA Est. Nos. listed} See [back][side][bottom][top] for EPA Est. No. in Lot code

NET CONTENTS: {to be inserted on container label} Lot Code: {to be inserted on container label}

{Text will appear in a running/repeating pattern and may or may not appear in a box/panel}