

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 4, 2019

Jane M. Miller Goulston Technologies, Inc. c/o Biologic Regulatory Consulting, Inc. 10529 Heritage Bay Blvd. Naples, FL 34120

Subject: Label Amendment – Update Pesticide Storage Language and Other Label

Changes

Product Name: Lurol Ag-1500 EPA Registration Number: 48737-3 Application Date: 11/02/2018 Decision Number: 546467

Dear Ms. Miller:

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.

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

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with FIFRA section 6. If you have any questions, please contact Jake McFarley by phone at (703) 347-0123, or via email at McFarley.Jake@epa.gov.

Sincerely,

Kathryn Montague, Acting Product Manager 33

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Regulatory Management Branch 1 Antimicrobials Division (7510P)

Office of Pesticide Programs

Enclosure: Master Label

LUROL Ag-1500

[ABN: LUROL Ag-1500 FLEX]

[Ready to Use Version of Silvadur™ 900]

[Long-Lasting Antimicrobial Preservative for Odor Control] [For Use in the Manufacturing of Coatings, Films, and Fibers]

ACTIVE INGREDIENT:

ACCEPTED

12/04/2019

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 48737-3

KEEP OUT OF REACH OF CHILDREN CAUTION

READ THIS LABEL BEFORE USING.

| 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 first 5 minutes then continue rinsing eye. |
| | Call a poison control center or doctor for treatment advice. |
| Have the product container or label with you when calling the poison control center or doctor, or going for | |
| treatment. For information on this product, contact the National Pesticide Information Center, 1-800- | |
| 858-7378, Monday-Friday, 7:30 AM-3:30 PM PST. You may also contact the National Poison Control | |
| Center, 1-800-222-1222, day or night, for emergency medical treatment information. | |
| NOTE TO PHYSICAN: Probable mucosal damage may contraindicate the use of gastric lavage. | |
| Measures against circulatory shock, respiratory depression and convulsions may be necessary. | |

Manufactured by: Goulston Technologies, Inc. PO Box 5025 Monroe, NC 28111-5025

EPA Reg. No. 48737-3 EPA Est. No. XXXXX-XX-XXX

Net Contents: ____ GAL.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. De-activation may be required during clean up if a spill occurs.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in original, tightly closed container. Do not allow to freeze.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to the label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For Containers equal to or less than 5 Gallons: Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

For Containers greater than 5 Gallons: Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows (all sizes): Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

DIRECTIONS FOR USE

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

The active ingredient in Lurol Ag-1500 is effective against odor causing bacteria, bacteria which cause staining and discoloration, mold and mildew, and algae as a static agent. Lurol Ag-1500 can be used as a final bacteriostatic finish on the listed items.

COMMERCIAL AND INDUSTRIAL APPLICATIONS

LUROL Ag-1500 is a long lasting antimicrobial preservative for industrial products, that when incorporated into materials during the manufacturing process, imparts antimicrobial activity and prevents the growth of bacteria, mold and mildew that may cause unpleasant odors, discoloration or deterioration of the treated product.

Use Instructions:

- Prepare solutions by simply adding LUROL Ag-1500 to water and stirring. Dilute LUROL Ag-1500 by adding 0.2 to 2 fluid ounces of Lurol AG-1500 per cup (3.2 to 32 fluid ounces of Lurol AG-1500 per gallon) of water.
- Apply to organic or inorganic substrates by:
 - padding using a dip bath and nip roll configuration
 - spraying
 - foaming incorporating a foaming additive
- All application processes should target a final treatment of 10 1000 ppm on the surface.
- Dry substrate at temperatures from ambient to a maximum of 200° C (392° F).

Note: For each application, determine optimum application and drying conditions, such as time and temperature before use.

Approved Commercial and Industrial Applications

Non-food contact uses in industrial and household products include the following:

Filtration Media

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air-handling systems
- Air filters/materials
- Aquarium filter material

Bedding Applications

- Bed sheets, blankets, and bedspreads
- Mattress pads and mattress ticking, and upholstery composed of acrylics, acetates, cotton, nylon, polyester, polyolefin, wool
- Filling material for use in pillows, sleeping bags, comforters, where the fiber is cotton, natural down, nylon, polyester, feathers, rayon, or wool

Clothing & Athletic Gear Applications

- Filling material for use in apparel where the fiber is cotton, natural down, nylon, polyester, feathers, rayon, or wool
- Socks and hosiery comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/ Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Athletic and casual shoes insoles and components
- Athletic gear including protective pads, helmet liners, wrestling/work-out mats
- Under garments
- Athletic and outerwear apparel (e.g., jackets, sweaters, sweatshirts, sweatpants, jerseys, shirts, shorts, coats, raincoats, overcoats, ponchos)

Wall, Upholstery and Floor Coverings

- Carpets and draperies made from nylon, polyester, polypropylene, cotton, acrylic, wool, or spandex
- Throw rugs made of synthetic and natural fibers / fabrics
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polypropylene, rayon, spandex, vinyl, wool
- Vinyl paper-wall paper for non-food contact surfaces

Household Use Items

- Cellulose sponges for non-food contact surfaces
- Toilet tank and seat covers
- Umbrellas
- Vacuum cleaner bags and filters
- Shower curtains
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Non-woven fabrics containing polyolefin, polypropylene, polyester, nylon, and other synthetic fibers for use in disposable diapers, pet pads, covers, automotive products, wall coverings

Wipes Applications for Non-Food Contact Surfaces

- Pre-moistened novelettes and tissue wipes (these do not impact pesticide properties)
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, counter tops; the wiping cloths do not impact pesticide properties

Industrial Applications

- Buffer pads (abrasive and polishing)
- Fire hose fabric
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails and ropes

Paints and Coatings for Non-Food Contact Applications

LUROL Ag-1500 can be used in paints and coatings as an in can preservative for protection of paint
film. Types of paints and coatings include: latex indoor/outdoor paints and stains, wood stains,
architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd,
urethane, enamel, epoxy, siloxane, amino, resins, textile coatings, extrusion coatings, architectural
coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl ester
and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy
laminating resins and blends and copolymers there of

NOTICE: GOULSTON warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated in the bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. To the extent consistent with applicable law, GOULSTON TECHNOLOGIES, INC. SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

[Silvadur™ is a trademark of The Dow Chemical Company]

[Optional Marketing Statements -

MOLD, MILDEW, AND ODOR INHIBITOR

LUROL AG-1500 is an antimicrobial agent effective against odor causing bacteria.

LUROL AG-1500 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

LUROL AG-1500 is an antimicrobial agent effective against mold and mildew.

LUROL AG-1500 is an antimicrobial agent effective against algae.

LUROL Ag-1500, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous non-food contact washable bathroom and kitchen surfaces and fixtures around the home.

Effective on hard non-porous non-food contact washable surfaces made of fiberglass, glazed porcelain, tiles, stainless steel, synthetic marble.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and mold and mildew.

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of mold and mildew.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, mold and mildew, and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of mold and mildew.

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, mold and mildew and algae.

Prevents deterioration caused by bacteria and mold and mildew. Inhibits deterioration caused by bacteria.]