70385-4

U9/20/2011 INITED ST TS ENVIRONMENTAL PROTECTION AG

SEP 2 0 2011

Georgia Anastasiou Agent for ProRestore Products Lewis and Harrison 122 C Street N.W. Suite 740 Washington DC 20001

SUBJECT:

Microban X-590 Institutional Spray EPA Registration Number: 70385-4 Application Dated: January 14, 2011 Receipt Date: July 12, 2011

Dear Ms. Anastasiou:

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comments.

• Response to letter dated April 12, 2011 for Label Amendment.

General Comments

- On page 2 revise the first statement under "Personal Protective Equipment" to read: "Some materials that are chemical-resistant to this product are *Barrier Laminate*, *Butyl Rubber* ≥ 14 mils, Nitrile Rubber ≥ 14 mils, Neopren Rubber ≥ 14 mils, Polyvinyl Chloride (PVC) ≥ 14 mils, Viton ≥ 14 mils. For more options, follow the instructions for selections category C on the chemical-resistance category selection chart..."
- 2. On page 3 under "GENERAL PRECAUTIONS AND RESTRICTIONS" heading revise language deleting the sentence "Do not enter or allow unprotected persons to enter until treated areas have dried". Insert the language "Do not allow adults, children or pets to enter the treated area until sprays have dried".
- 3. On page 4 under the "AS BACTERIOSTAT, FUNGISTAT AND DEODORIZING AGENT" revise the language to read "After sewage or *flood* damage, discard carpet and padding."

A stamped copy of the accepted labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

| CONCURRENCES | | | | | | | | |
|--------------|--|--|--|--|--|--|---------------------------------------|--|
| SYMBOL | | | | | | | | |
| SURNAME | | | | | | | • • • • • • • • • • • • • • • • • • • | |
| DATE | | | | | | | | |

EPA Form 1320-1A (1/90)

OFFICIAL FILE COPY

Should you have any questions concerning this letter, please contact Emilia Oiguenblik at 703-347-0199 or Velma Noble at(703) 308-6233.

Sincerely,

Jourg Lands Velma Noble

for

Product Manager (31) Regulatory Management Branch I Antimicrobials Division (751 0P)

MICROBAN X-590 INSTITUTIONAL SPRAY

MILDEWCIDE • BACTERICIDE • FUNGICIDE DEODORANT, DISINFECTANT AND ANTIMICROBIAL

FOR INSTITUTIONAL, HOUSEHOLD, FARM PREMISE USES AND ANIMAL QUARTERS

Microban X-590 Institutional Spray is a Broad Spectrum Disinfectant Against most Bacteria and is also effective in controlling insects, fungus and bacterial or organic odors.

| ACTIVE INGREDIENTS | |
|----------------------------------------|---------------|
| o-Phenylphenol | 0.22% |
| Diisobutylphenoxyethoxy ethyl dimethyl | |
| benzyl ammonium chloride monohydrate | 0.70% |
| N-octyl bicycloheptene dicarboximide | 0.33% |
| Piperonyl butoxide technical | 0.20% |
| d-trans-Allethrin | 0.10% |
| INERT INGREDIENTS | <u>98.45%</u> |
| TOTAL | |

[equivalent to (butylcarbityl) (6-propyl piperonyl) ether: 0.16% and related compounds: 0.04%]

E.P.A. Reg. 70385-4 E.P.A. EST. 70385-PA-001

KEEP OUT OF REACH OF CHILDREN WARNING

| | 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 ON SKIN OR CLOTHING: | Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20minutes. 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 by mouth to an unconscious person. |
| IF INHÀLED: | 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 prod | uct container or label with you when calling a poison control center or doctor, or going for treatment. |

See other precautions on side panel

Net Contents ____8 OZ. (0.237) Litres ____1 GAL. (3.785) Litres ____ 1 PT. (0.473) Litres 1 QT. (0.946) Litres 55 GAL. (208.175) Litres 5 GAL. (18.925) Litres Mfg by: PRORESTORE PRODUCTS, 4660 Elizabeth Street, Coraopolis, PA 15108 SHAKE WELL BEFORE AND DURING USE U.S. Patent No. 3,458,629

ACCEPTED

with COMMENTS in EPA Letter Dated:

Microban X-590 Institutional Spray (EPA Reg. No. 70385-4) Revised Label Dated 8/15/11

SEP 20 2011 Under the Federal Insecticide,

Fungicide, and Rodenticide Act and

amended, for the pictoria 70285 - 4

Page 1 of 4

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be harmful if swallowed (inhaled or absorbed through the skin). Do not breathe vapors (dust or spray mist). Do not get in eyes, on skin or on clothing. May cause eye (and skin) irritation.

Personal Protective Equipment (PPE): Some materials that are chemical-resistant to this product are waterpoof. For more options, follow the instructions for category A on the chemical-resistance category selection chart. Mixers, loaders, applicators and other handlers must wear: long-sleeved shirt and long pants, and shoes plus socks.

 In addition to the above PPE, applicators using high-pressure handwands in an enclosed area must wear at least a NIOSHapproved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with any N, R, P, or HE filter.

<u>User Safety Requirements</u>: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

<u>User Safety Recommendations</u>: Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements.

[For products packaged in containers equal to or greater than 5 gallons or 50 lbs.:]

Do not discharge effluence containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution 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.

PHYSICAL AND CHEMICAL HAZARDS

Flammable. Keep away from heat and open flame.

DIRECTIONS FOR USE

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

GENERAL PRECAUTIONS AND RESTRICTIONS:

Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. Remove pets, birds, and cover fish aquariums before spraying. (1) But not enter or allow unprotected persons to enter until treated areas have drived; (2) do not enter or allow unprotected persons to enter until vapors, mists, and aerosols have dispersed, and the treated area has been thoroughly ventilated; (3) do not apply this product in a way that will contact workers or other persons, either directly or through drift; (4) only protected handlers may be in the area during application. Do not remain in treated area. Exit area immediately and remain outside the treated area until aerosols, vapors, and/or mists have dispersed. Do not wet article to point of runoff or drip. Do not use treated article until spray has dried. Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.

Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application. Surface spray uses are limited to spot treatments only. Broadcast surface applications are prohibited.

SHAKE WELL BEFORE AND DURING USE

Spray areas until thoroughly moist, giving special attention to cracks and crevices. Allow ten to twenty minutes for drying. It is not necessary to wipe the sprayed surface. Microban should not stain those materials not stained by water.

Direct and repeat spraying of Ants, Roaches, Bedbugs, Silverfish and other harmful insects and in the cracks, crevices and hidden surfaces where they hide are necessary for control. Apply every 28 days or as often as needed.

To Kill Fleas and Ticks: Remove and destroy old animal bedding. Spray sleeping quarters of animals, floor areas, around baseboards, window and door frames, cracks, crevices and wherever the presence of these insects are suspected. Repeat as necessary. Thoroughly vacuum rugs and carpets prior to application. Do not spray animals. Put fresh bedding in animal guarters after spray has dried. Treat animals with a registered flea and tick control product before allowing them to enter treated area.

To Kill Sowbugs, Centipedes, Firebrats and Mites: Contact as many insects as possible with the spray. Also thoroughly spray all parts of the room suspected of harboring these pests. Special attention should be paid to cracks, crevices, hidden surfaces under sinks, basement and utility rooms, floors, doorjams, behind and under stoves and refrigerators.

To Kill Flies, Mosquitoes, Gnats and Wasps: Close all doors and windows and spray upward into center of room with a slow sweeping motion. Spray 5-10 seconds for average room. Keep room closed for 15 minutes after spraying. Ventilate room thoroughly before re-entry. Sweep up and destroy fallen insects. Before spraying cover exposed food and utensils.

To Kill Carpet Beetles, Lice and Moths: Clean all articles prior to application. Thoroughly spray top and undersides of rugs and carpets. Thoroughly spray the interiors of lockers, trunks, closets, cupboards and other storage areas. Spray directly on restroom fixtures. When treating upholstered furniture and mattresses thoroughly spray exterior, paying particular attention to seams and folds. Interior should be treated to eliminate hidden infestations.

Microban® X-590 Institutional Spray when used as directed is effective in decontaminating the treated exposed surfaces of bedding. mattresses, textiles, drapes, upholstered furniture, rugs, carpets and in storage areas to control mold, mildew, fungus, insects and odors wherever they are a problem.

- Pest Control Service
 - Odor Control Service
- Carpet Cleaning Service
- Water Damage Service
- Restoration Service
- **Disinfection Service**
- - Waste-Removal Service
- Trash Chutes and Garbage Rooms
- Waste Compactors ٠
- Storage areas and Basements .
- Condensation collection and Drainage areas •
- Refuse trucks
- Second hand furniture stores
- Shoes & boots

- Movie booths
- Bowling alleys
- Exercise rooms
- Veterinaries ٠
- Laundry receiving stations
- Antique shops
- Upholsterers shops

GENERAL METHOD OF APPLICATION

Surfaces and objects must be cleaned of gross filth with suitable detergent before treatment. Spray surfaces and articles until thoroughly moist (do not wet article to point of runoff or drip), use enough so that treated surfaces and objects remain moist for at least 10 minutes. May be applied with a sponge to pre-cleaned, hard non-porous surfaces, allowing to dry for 10 minutes.

AS A MILDEWCIDE, FUNGICIDE AND BROAD SPECTRUM DISINFECTANT: (Kills most gram negative and gram positive bacteria and influenza virus). In schools, hotels, motels, restaurants, offices, homes and industrial buildings. For use on pre-cleaned hard non-porous surfaces such as glazed tiled porcelain, waste receptacles, compactors, on, in and around rest room fixtures, toilet seats, locker rooms, telephones, door knobs, hospital apparatus and equipment, furniture, empty containerized storage units. For athletes foot fungus on floors, shower stalls and rest rooms. Follow method of application specified above.

AS A BACTERIOSTAT, FUNGISTAT AND DEODORIZING AGENT

Apply Microban X-590 Institutional Spray as directed to floors, walls, ceilings that have been damaged by smoke, fire, floods and sewage backups. For cleanup operations in areas such as attics, wall voids, basements, areas above suspended ceilings and similar inaccessible spaces in buildings. Spray avian, rodent and other animal and human wastes and carcasses as directed above, prior to removal and disposal. Treat spaces and surfaces as specified in method of application. For use as a bacteriostat, fungistat and deodorizing agent on carpeting found in schools, hotels, motels, homes, shelters and commercial and residential buildings. After water damage, vacuum or extract as much water as possible before application. After sewage damage, discard carpet and padding. Apply with sprayer until thoroughly moist to carpet nap and backing. Rake or brush in. Do not apply so much as it would drip. Allow to remain dry. For best results, carpets must be cleaned before application.

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to preclean or decontaminate critical or semicritical medical devices prior to sterilization or high level disinfection.

TO DISINFECT FARM PREMISES, POULTRY HOUSES, ANIMAL PENS AND VEHICLES

Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with the solution for a period of 10 minutes. Immerse all halters, ropes and other types of equipment used in handling and restraining animals, as well as forks, shovels and scrapers used for removing litter and manure. Allow all surfaces to dry thoroughly. Ventilate buildings, cars, boats and other enclosed spaces. Do not house livestock or employ equipment until treatment has been absorbed, set or dried. Thoroughly scrub all treated feed racks, mangers, troughs, automatic feeders, fountains and waterers, with soap or detergent, and rinse with potable water before reuse. Do not apply more than one time per day.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep from freezing. Store in ventilated areas.

PESTICIDE DISPOSAL: To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.