

80346-1

12-20-2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D.C., 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

DEC 20 2006

Ag-Chem Consulting  
Pesticide Science and Registration  
12208 Quinque Lane  
Clifton, VA 20124

Attention: Dr. Matthew Brooks c/o for Modec Inc.  
Regulatory Manager

Subject:       MDF-200 Bottle (Part A & B)  
              EPA Reg. Nos. 80346-1 & 2  
              Amendment Application Date: October 25, 2006  
              EPA Receive Date: October 30, 2006

EPA has received your letter requesting "restamping" of the most recently approved label (October 19, 2006) because of the following reasons: 1) Previously submitted photographs were omitted and, 2) A strain of organism was omitted from the label where the company submitted acceptable efficacy data and it was found acceptable by the Agency.

Until suitable preventative maintenance language is incorporated, several photographs are not acceptable. A number of use sites identified in the photographs could potentially be associated with a moisture damage. Preventative care should be in place before treatment of a product is recommended (see label revisions below).

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided the following label revisions are inserted:

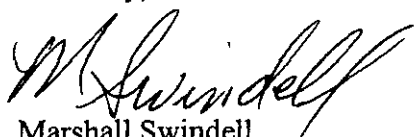
- More informative language regarding use directions for remedial treatments is needed in the label. The label implies that professional remedial specialist use this product to treat mold and mildew growth on porous and non-porous areas, however, the language regarding remedial treatment or preventative treatment is vague. Language needs to be incorporated that describes a comprehensive remediation program.

- Since this use will be used as a remediation treatment in commercial and residential settings and workers will be applying MDF-200 Part A& B, Worker Protection Standard (WPS) language needs to be incorporated.
- Additionally, treatment for certain surface areas are different. In some instances, you amalgamated treatment of wallboards, wood and cement areas together which leads to somewhat ambiguous explanation on what treatment method is to be used to treat the specific area. This language needs to be corrected.
- Within this language, there also needs to be more clarification regarding how much product should be used to treat a given square footage. Specifically, there needs to be better language to describe if the product will be used treat a mass area or spot treat small areas.

There are products currently registered that have sufficient language that clarifies the concerns EPA has identified above (EPA Registration No. 72304-1 for example).

If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062.

Sincerely,



Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobials Division (7510C)

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# modec inc. MDF-200 Part A

## Modec Decon Formulation Antibacterial Disinfectant and Cleaner

### Cleaner · Mildewstat Disinfectant · Deodorizer · Fungicide · Virucide

**MDF-200 Part A - Active Ingredient:**

Alkyl (50% C <sub>14</sub> , 10% C <sub>16</sub> , 40% C <sub>12</sub> )	
Dimethyl benzyl ammonium chlorides .....	3.2%
Inert Ingredients: .....	<u>96.8%</u>
Total	100.0%

**MDF 200 Part B - Active Ingredient:**

Hydrogen Peroxide.....	7.95%
Inert Ingredients: .....	<u>92.05%</u>
Total	100.0%

## DANGER

**KEEP OUT OF REACH OF CHILDREN.** Corrosive. Causes irreversible eye damage. Causes skin irritation. Harmful if inhaled. Do not get in eyes, on skin, or on clothing. Avoid breathing vapor or spray mist. Wear protective eyewear such as goggles, face shield or safety glasses. Wear chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

**SEE BACK PANEL FOR ADDITIONAL  
PRECAUTIONARY STATEMENTS**

**NET CONTENTS:**

**ACCEPTED  
COMMENTS  
EPA Letter Dated:**

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**Under the Federal Insecticide,  
Fungicide, and Rodenticide  
Act, amended, for the pesticide  
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## First Aid

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a 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 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 further treatment advice.

**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 or ambulance, then give artificial respiration, preferably mouth to mouth, if possible. Call a poison control center or doctor for further treatment advice.

### NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Modac's Decon Formula (MDF)  
is Commercially Manufactured  
using the Formula Licensed by



Sandia National Laboratories

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### **Modex Decon Formulation Antibacterial Disinfectant and Cleaner**

Advanced Restoration, Remediation & Disinfectant System  
Coverage up to 500 square feet

Technology originally developed and patented by Sandia National Laboratories.  
*A Serious Product for a Serious Problem*  
MDF 200 is Produced Commercially using the Formula Licensed by Sandia National Laboratories

#### Foaming Action

- Inhibits and Retards Growth of Mold, Mildew and Fungus.
- Shown to be effective against the pathogenic bacteria Staphylococcus aureus, Salmonella choleraesuis, and Pseudomonas aeruginosa
- Cleans & Controls Mold Growth on Porous and Non-Porous Surfaces
- Cleaner, Mildewstat, Fungicide, Disinfectant, and Deodorizer
- Used by Professionals in Schools, Hospitals, Homes, and Commercial Facilities

Before and After  
**Photo plate 1**



Photo Plate 2

MDF 200 is a breakthrough product based on technology originally developed and patented by Sandia National Laboratories.  
MDF 200 is commercially manufactured using the license from Sandia National Laboratories. MDF 200 kills mildew & fungus (such as those that cause Athlete's Foot) on hard nonporous surfaces and inhibits the growth of mold, mildew and fungal spores on wooden decks, cement, aluminum, wood siding and other porous and non-porous surfaces. This technology is used by professionals for remediation in hospitals, schools, homes and commercial facilities.

MDF 200 effectively cleans and disinfects all hard nonporous surfaces including those in basements and bathrooms as well as metal, plastic and ceramic tile.

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MDF 200 cleans and inhibits the growth of mold and mildew on porous surfaces of fences, cement walkways, siding, wood, painted walls, metal, plastic, stucco, planters boxes, terracotta, and ceramic tile.

MDF 200 is an effective biocide that cleans and restores basements, bathrooms, fences, walkways and any other place mold grows.

**STOPS MOLD GROW**

Mold spores are ever-present in the environment and will grow when food and moisture are present.

Professionals recommend appropriate eye and respiratory equipment be worn when undertaking mold abatement procedures.

When Applied as an Aerosol

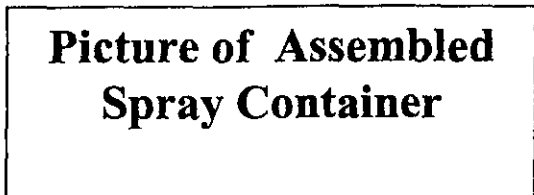


Photo Plate 3

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**ASSEMBLY:** MDF 200 is a two part system. Fill empty mixing container with equal portions of Part A and Part B. Screw mixing container onto the spray-bridge (dip-tube side). Snap aerosol container onto the small end of spray-bridge making sure container is firmly seated.

**USE:** Depress round actuator tab of spray-bridge to dispense newly mixed solution.

**Note:** To prevent the possibility of spraying pure propellant from the aerosol container, do not allow liquid in mixing bottle to become empty during use. The combined liquid from Parts A & B remains active for 12 hours after mixing. Product must remain in contact with surface area for a minimum of 10 minutes.

Contents of aerosol container is under pressure. Do not puncture or incinerate container. Do not expose to heat, fire, sparks or flame. Do not store at temperatures above 120F.

Intentional misuse by intentionally or deliberately concentrating and inhaling contents can be harmful or fatal.

Remove stains from surfaces prior to mold and mildew treatment

MDF 200 may be used to clean surfaces. Spray liberally to coat surfaces and allow to remain wet for 30 minutes. Scrub surface with sponge to remove stains.

Mold Remediation Clean-up Methods

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Prior to application of MDF 200, clean the affected area using one of the following or another preferred professional method.

Method 1: Wet Vacuum (in the case of porous material, some mold spores/fragments will remain in the material but will not grow if the material is completely dried).

Method 2: Damp-wipe surfaces with plain water or use a wood floor cleaner; scrub as needed.

Method 3: High-efficiency particulate air (HEPA) vacuum after the material has been thoroughly dried. Dispose of the contents of the HEPA vacuum in well-sealed plastic bags.

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### SURFACE CLEANING PROCEDURES

Prior to application of MDF 200 as an antimicrobial agent, gross filth, heavy soil, blood and other bodily fluids must be thoroughly cleaned from surfaces and objects before application of this product. Blood and other bodily fluids should be autoclaved and disposed of according to local regulations and infectious waste disposal. Use appropriate personal protection when handling items exposed to blood and bodily fluids.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. The product is designed specifically as a general cleaner and disinfectant for use in homes, hospitals, and commercial facilities. It is formulated to disinfect hard, non-porous, inanimate environmental surfaces such as floors, walls, metal surfaces, stainless steel, porcelain, glazed ceramic tile, plastic surfaces, bathrooms, shower stalls, bathtubs, and cabinets. May be used in the kitchen on non-food contact surfaces. In addition, this product deodorizes areas that are hard to keep fresh smelling including garbage cans, basements, restrooms and areas prone to odors caused by microorganisms.

**MODEC DECON FORMULA – “MDF” is a binary (two part) system.**

**Before use, mix equal parts of MDF PART A and MDF PART B. Apply the newly mixed solution as a spray onto surfaces as directed below.**

**DISINFECTION, DEODORIZING AND CLEANING** - Prior to disinfection of surfaces, spray the mixture (Part A and Part B) onto the surface and allow to penetrate, and then clean all surfaces thoroughly. To disinfect surfaces reapply the mixture and allow to remain wet for ten minutes. No scrubbing is necessary. The product will not leave grit.

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**BACTERICIDAL ACTIVITY** - <sup>80346-1</sup> When used as directed, this product exhibits effective disinfectant activity against the organisms: Staphylococcus aureus, including Methicillin-Resistant Staphylococcus aureus, Staphylococcus epidermidis, Salmonella choleraesuis, Pseudomonas aeruginosa, Klebsiella pneumoniae, Proteus mirabilis, Vancomycin-Resistant Enterococcus faecalis and Enterobacter aerogenes, Escherichia coli O157:H7 and Escherichia coli (ESBL). When uses as directed, this product is virucidal against Influenza A and Influenza B virus. This product meets the requirements for hospital use.

**MILDEWSTAT** - To control mold and mildew on hard, non-porous surfaces, clean the surface to be treated, then spray with the product, making sure to wet completely. Let the surface air dry. Reapply as new growth appears.

**FUNGICIDAL ACTIVITY** - This product has been demonstrated to be fungicidal against *Trichophyton mentagrophytes*. Use as directed on hard, non-porous surfaces.

**MOLD CONTROL**- To control mold and mildew, clean the surface to be treated, then spray with the product, making sure to wet completely. Let the surface air dry. Clean surface and reapply as necessary.

**DEODORIZING** - Mix equal parts of MDF 200 PART A and MDF 200 PART B and apply to surfaces until they appear wet to eliminate odors. Allow product to air dry or surface to remain wet for at least 10 minutes.

**CONTACT TIME FOR ALL SURFACES** - Allow surface to remain wet for 10 minutes.

**Brush and Spray Applications**

For outdoor use on cement, aluminum and wood siding, wood decks and roofs to inhibit the growth of mold and mildew.

**Remove stains from surfaces prior to disinfection**

MDF-200 may be used to clean surfaces. Mix 4 ounces of MDF PART A and Part B into one gallon of water. Apply liberally to coat surfaces and allow to remain wet for 30 minutes. Scrub surface with sponge to remove stains.



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**SPRAYING** - MDF™ is a binary (two part) system. Mix equal parts of MDF PART A and MDF PART B directly into ULV spray equipment. Apply mixed product at a rate of 1 ounce to 100-sq. ft. of surface area. Allow surface to air dry or remain wet for at least 30 minutes.

**BRUSHING** - MDF™ is a binary (two part) system. Mix equal parts of MDF PART A and MDF PART B. Apply mixed product at a rate of 1 ounce to 100-sq. ft. of surface area. Brush into surface. Allow surface to air dry or remain wet for at least 30 minutes. Rinse.

**STORAGE AND DISPOSAL**

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

**STORAGE** – Store in a dry place no lower in temperature than 50°F or higher than 120°F.

**CONTAINER DISPOSAL** – Do not reuse empty container. Rinse empty container with water. Plastic containers may be disposed of in a sanitary landfill, incinerated, or if allowed by local authorities, by burning. If burned, stay out of smoke. For containers 1 gallon or more: Do not reuse empty container (bottle, can, and bucket). Wrap container and put in trash.

**PESTICIDE DISPOSAL** – Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinse is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions contact your Safe Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

EPA REG. NO. 80346- 1 (Part A)  
EPA REG. NO. 80346- 2 (Part B)  
EPA EST. NO. 65001-CO-01

US. Patent No. 6,566,574 B1 Made in USA

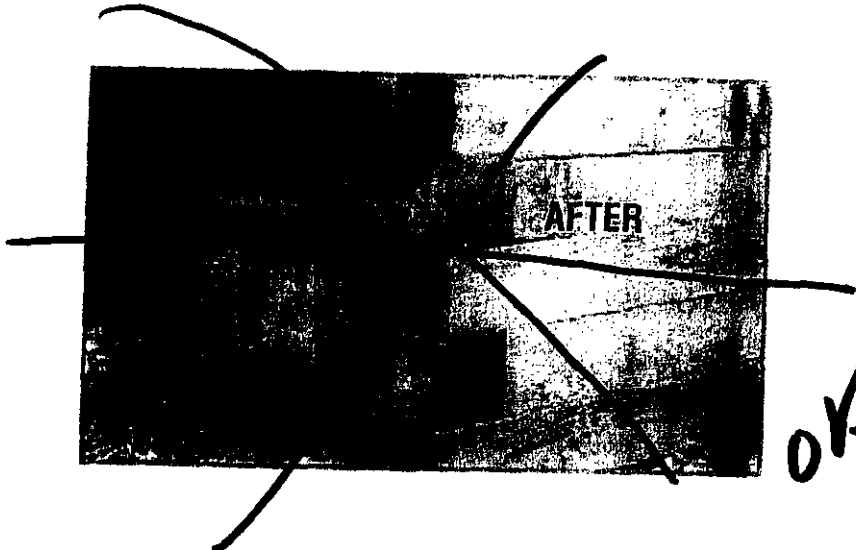
Manufactured by Modec, Inc. - 4725 Oakland Street  
Denver, Colorado 80239 - 800-967-7887  
1-800-967-7887 - www.deconsolutions.com  
info@deconsolutions.com

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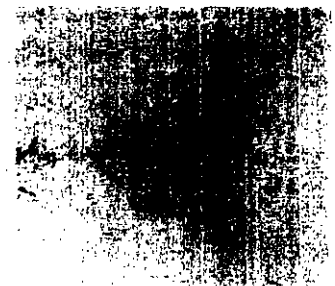
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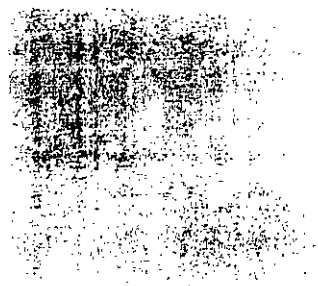


OK

Photo Plate 1



BEFORE



AFTER



BEFORE



AFTER



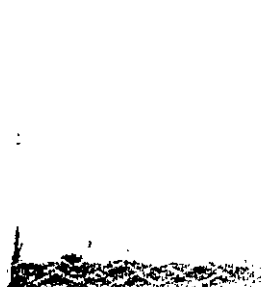
BEFORE



AFTER



BEFORE



AFTER

Photo Plate 2

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**ASSEMBLY & USE: MOLD SOLUTION**  
is a binary [2-part] system. Assemble spray attachment by inserting dip tube onto spray tip. Fill empty mixing container with equal portions of PART A and PART B. Place dip tube into mixing container and screw on firmly to seal. Snap small end of spray attachment onto power spray making sure attachment is seated firmly. The combined liquid remains active for 12 hours after mixing and must be in contact with the mold for 10 minutes. Covers up to 500 square feet.

**Photo Plate 3**

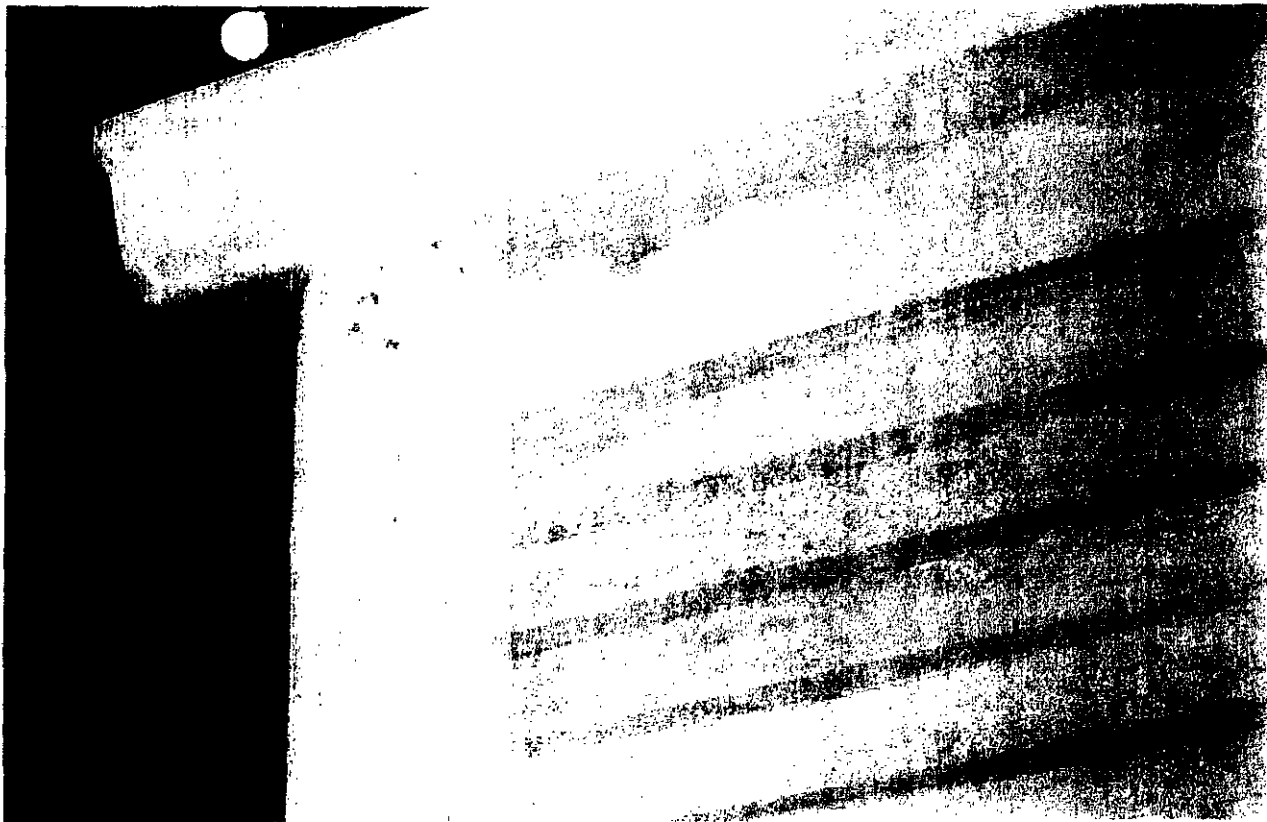
**ACCEPTED  
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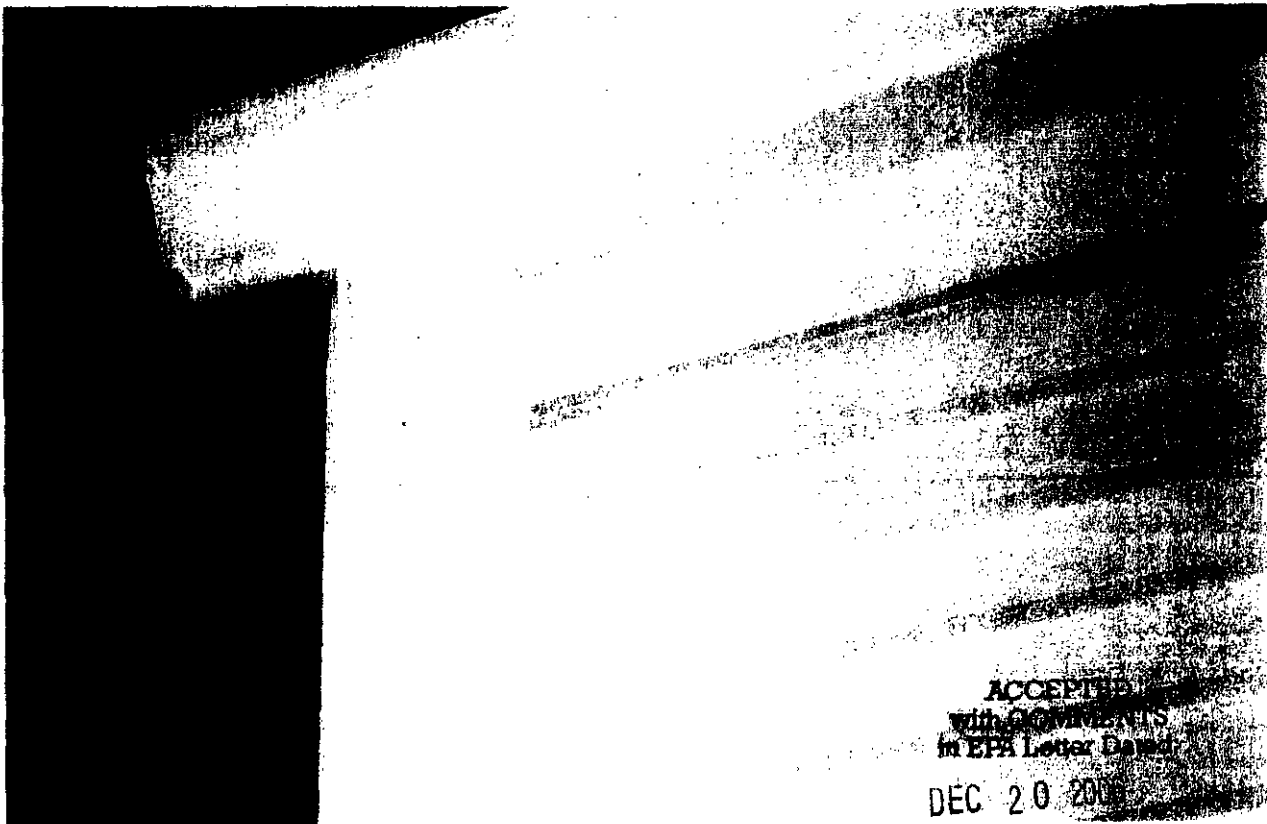
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siding before  
Image\_0027.jpg



siding after  
01302006 (6).jpg

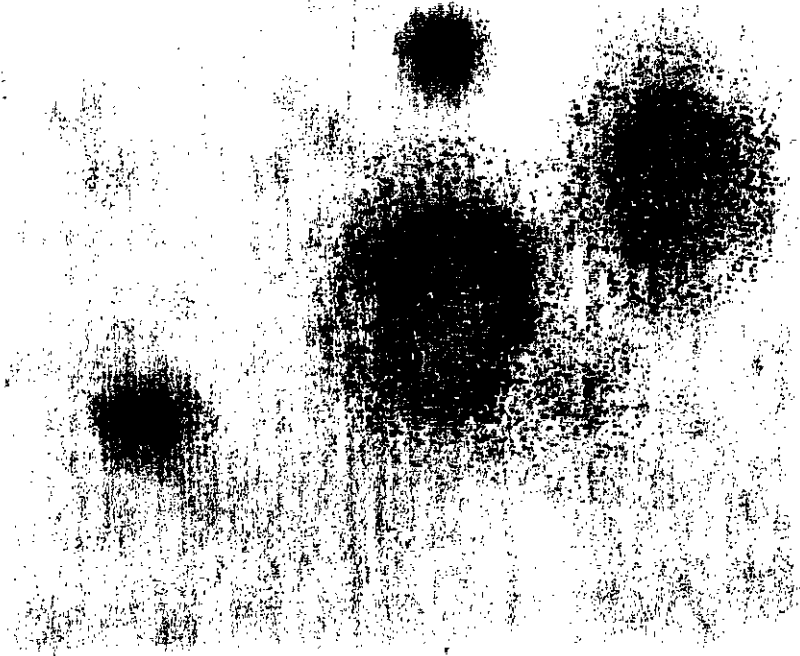
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basement before  
01302006 (7).jpg

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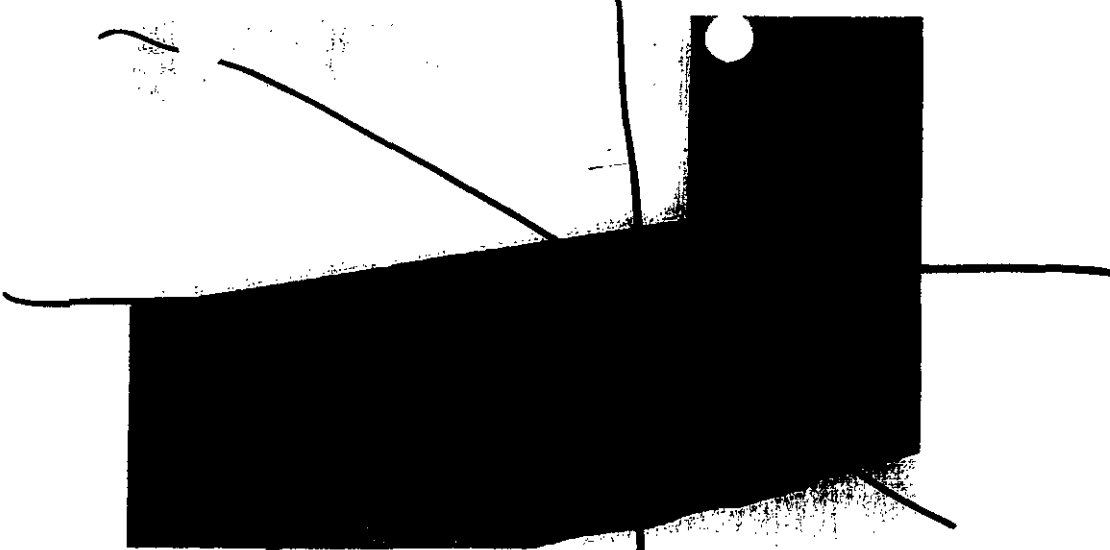
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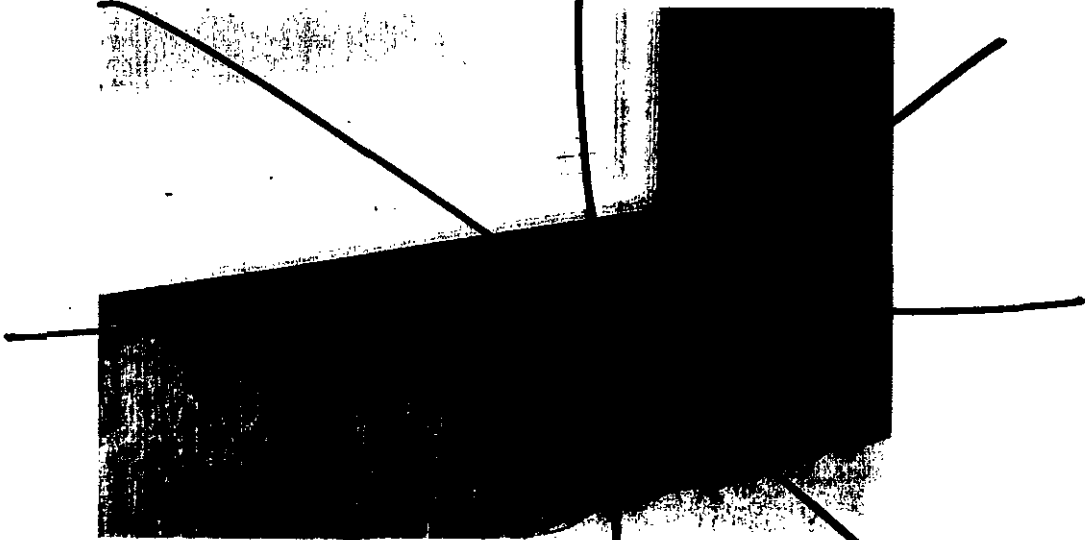


basement after  
01302006 (9).jpg

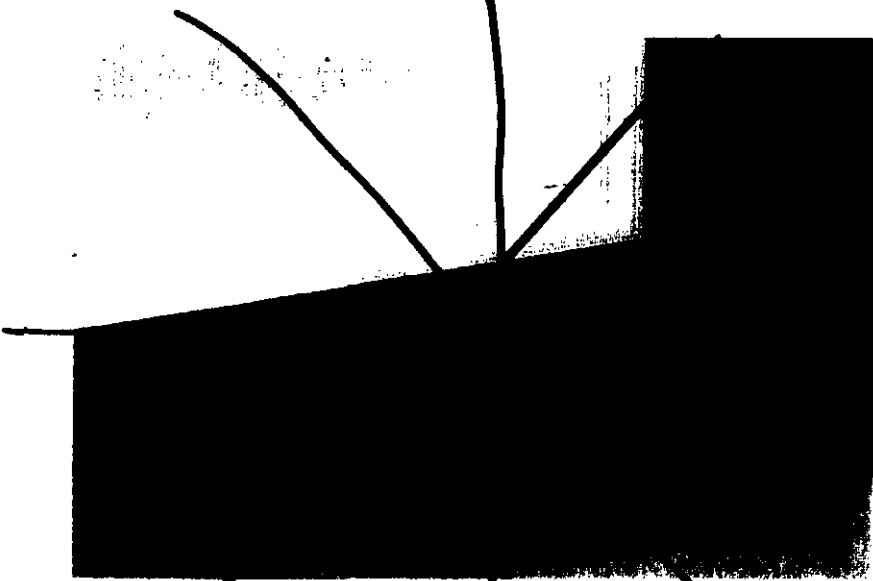
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window before  
Image\_0053.jpg



window foaming action  
Image\_0055.jpg



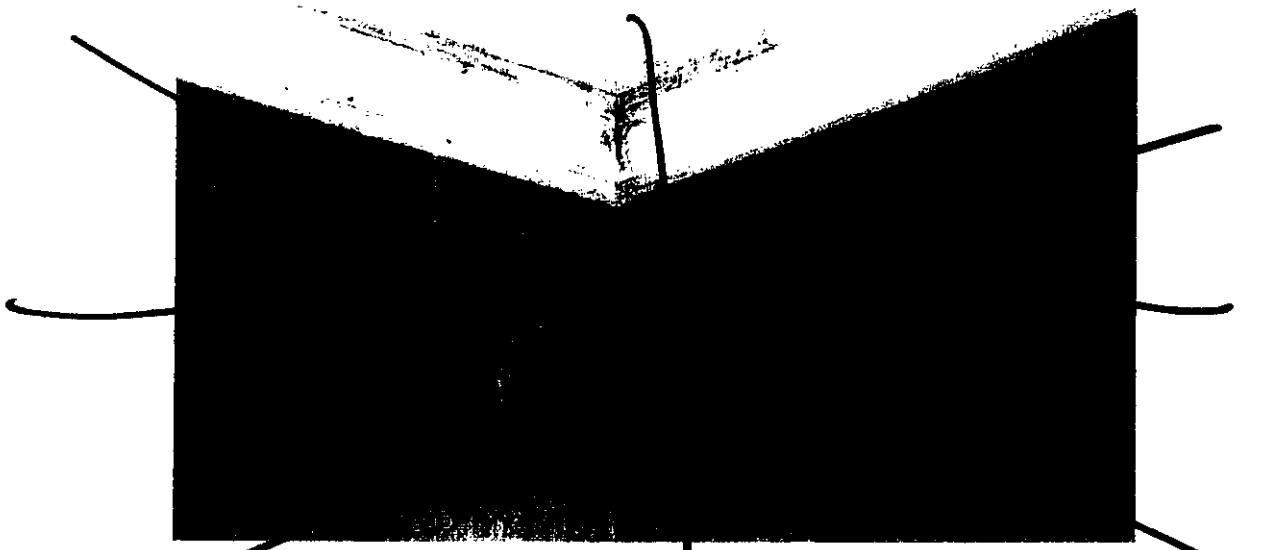
window after  
Image\_0058.jpg

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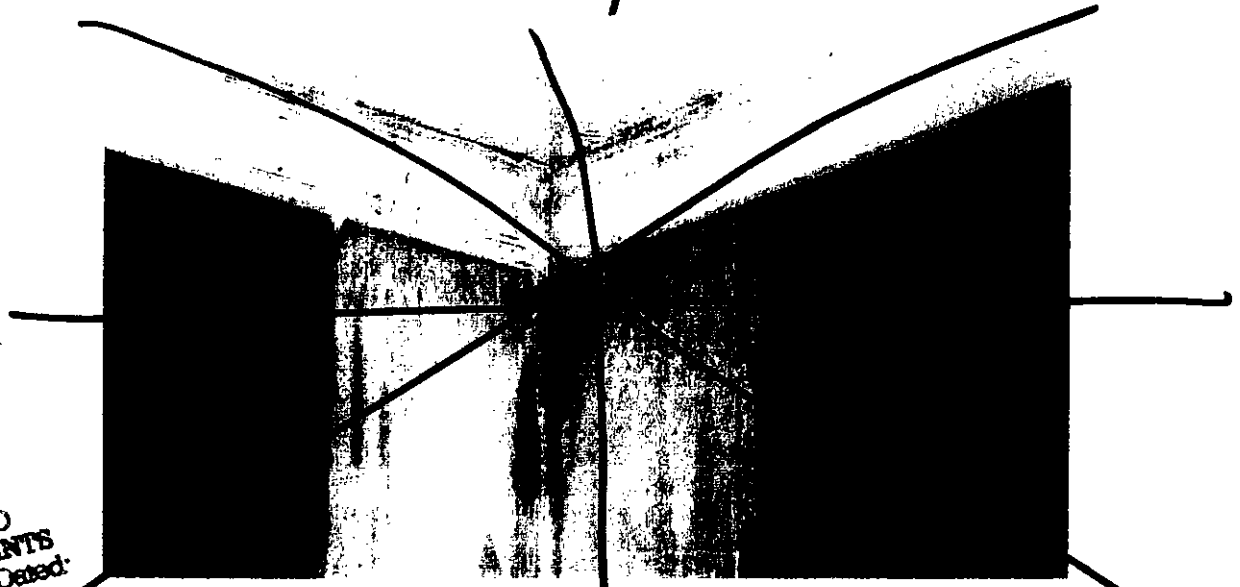
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ceiling before  
01302006 (14).jpg



foaming action  
01302006 (15).jpg



ceiling after  
01302006 (16).jpg

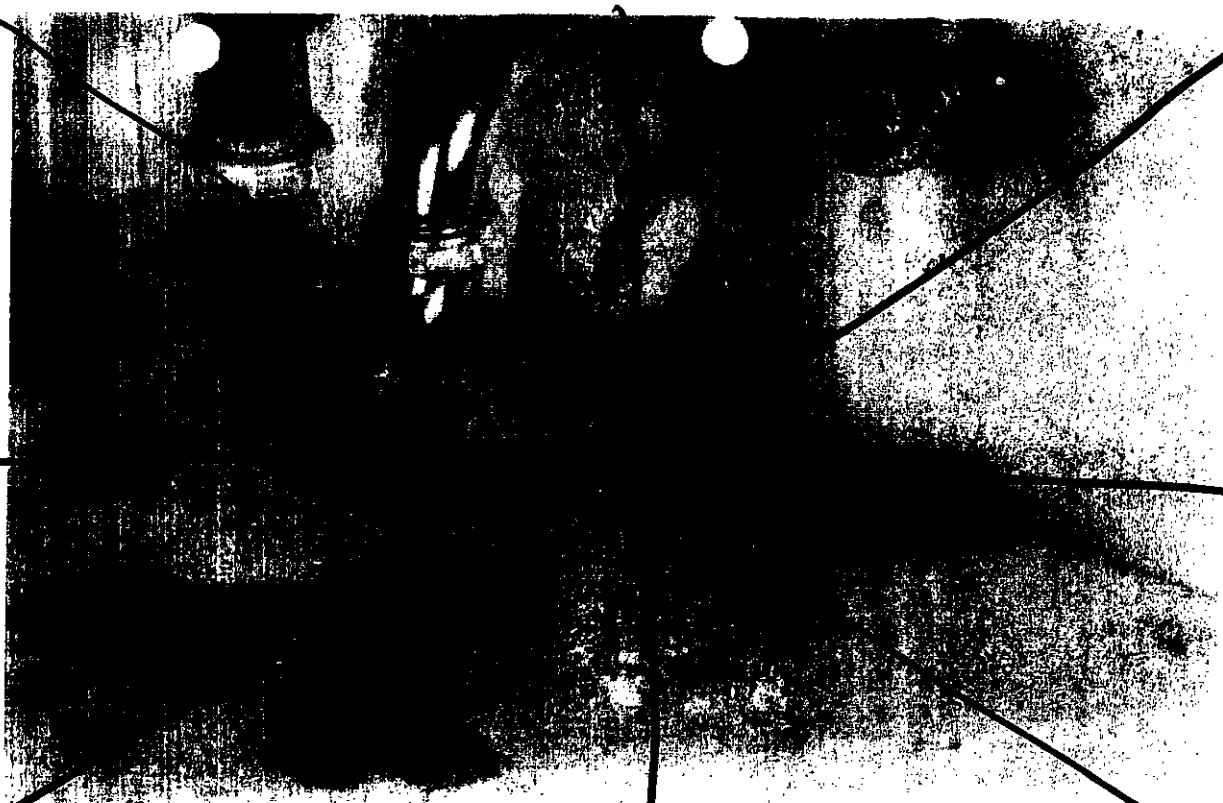
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WITH COMMENTS  
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When the enclosed is received,  
please return the enclosed to the  
Director, Office of the Inspector General,  
Department of Justice, Room 5638  
Justice Building, Washington, DC 20531

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sink before  
Image\_0077.jpg



sink after  
Image\_0093.jpg

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Plate 2





tile before  
YE6K1240.jpg



tile after  
YE6K1243.jpg

Plate 2

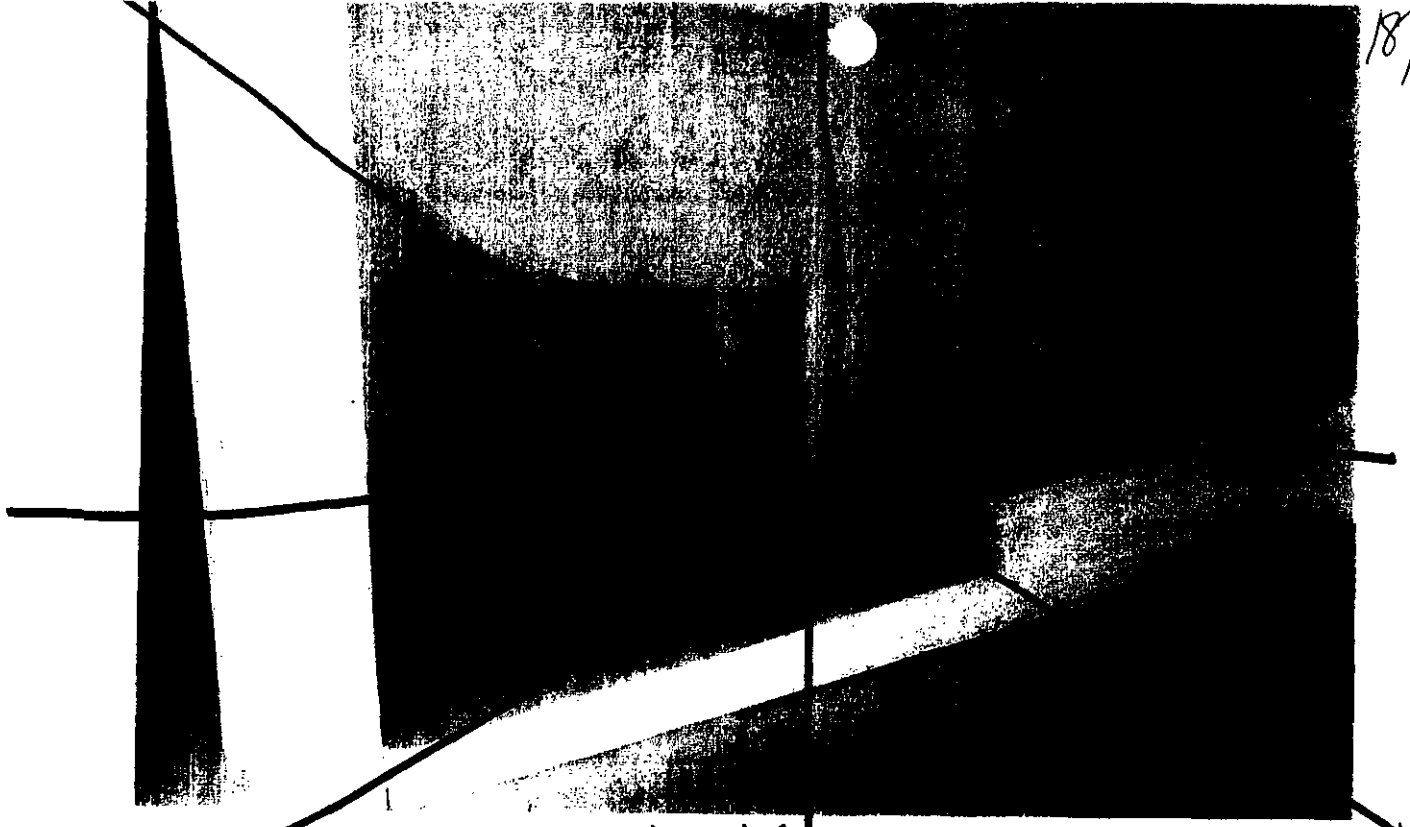
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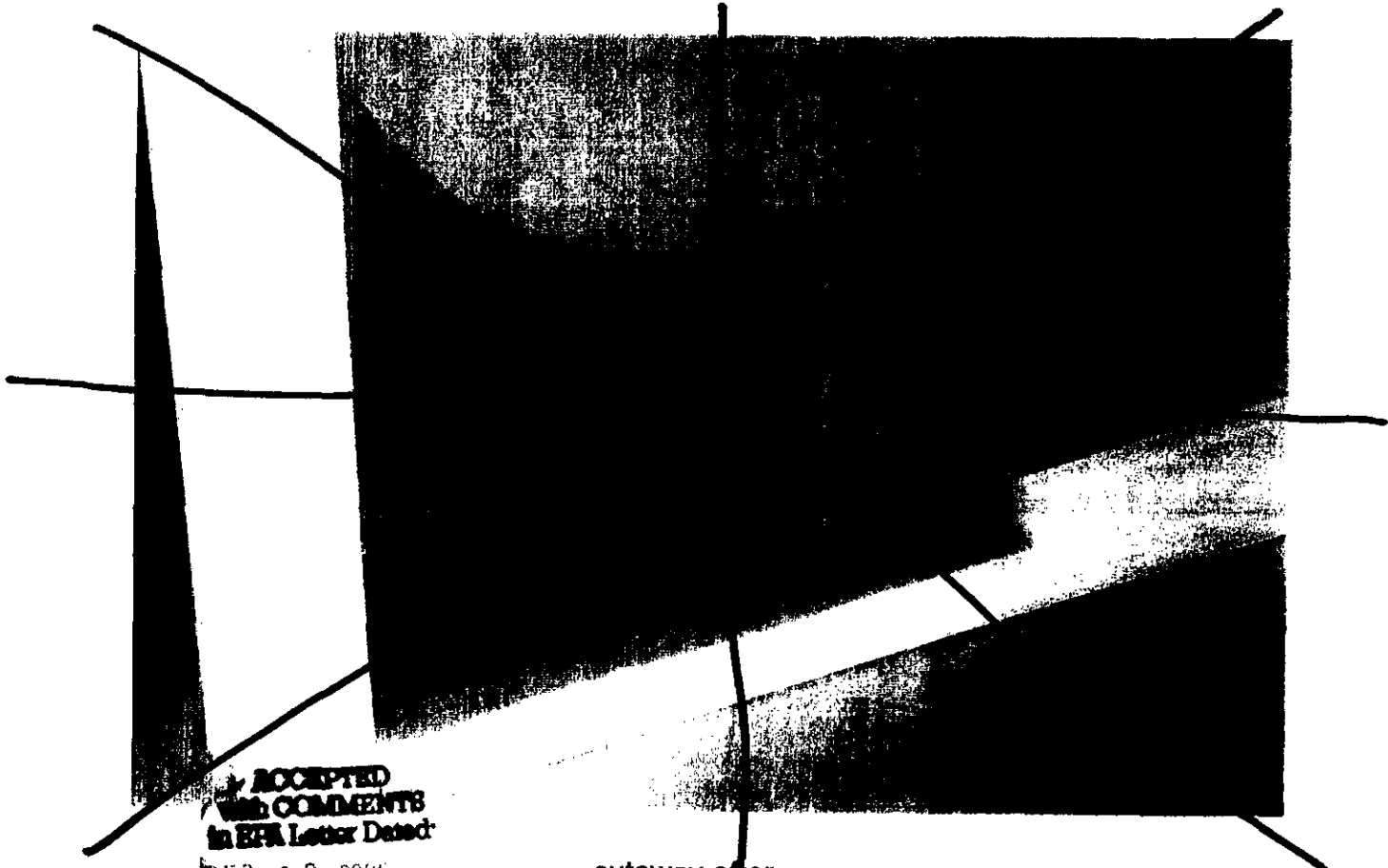
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cutaway before  
01302006 (18).jpg



cutaway after  
YE6K1235.jpg

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Plate 2