

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Ag-Chem Consulting Pesticide Science and Registration c/o for Modec, Inc. 12208 Quinque Lane Clifton, VA 20124

SEP 12 200

Attention: Dr. Matthew Brooks Regulatory Specialist

Subject:

MDF-200 Bottle (Part A) EPA Reg. No. 80346-1

Amendment Letter Dated April 16, 2007

The following amendment, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided the following label revisions are incorporated:

- On page 1, under the statement "SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS, in the underlined wording, delete the statement "sanitizer". No data was submitted to support sanitization claims.
- On page 1, all references to **mildewcide** should be changed to **mildewstat**. Available data conclude that this product is effective to "control and inhibit" and not "kill" intended organisms which the term mildewcide implies.
- On page 2, in the **First Aid** box in the **IF INHALED** section, change "and ambulance" to read " an ambulance".
- On page 3, under the section that says Foaming Action, change "Pseudomonas aeroginosa" to read "Pseudomonas aeruginosa"
- On page 3, under the section that says Foaming Action, delete all language that refers to "porous surfaces". Data was not submitted to support these claims.
- On page 3, under the wording "**Photo Plate 2**" after the word, "aluminum" add the word "siding".
- On page 3, under the wording "Photo Plate 2", delete the last sentence in this paragraph: "This technology is used by professionals for remediation in hospitals, schools, homes, and commercial facilities". This product is intended for general house hold, institutional and commercial use as a mold control alternative. Based on conversations with the registrant, all language and images in reference to use as a "mold remediation" alternative to be applied by "professionals" will be deleted from this label.

- On page 3, under the section that says Foaming Action, delete the word professional. (See bullet 7 above).
- On page 4, in the 3<sup>rd</sup> statement, delete the word "restores". *Restores* gives the impression that the integrity of the affected hard non-porous area will be dramatically improved by using this product. Those surfaces have been compromised by mold damage. Therefore, complete restoration of an infected area cannot be justified.
- On page 4, delete the following statement: "Professionals recommend appropriate eye and respiratory equipment be worn when undertaking mold abatement procedures". (See bullet 7 above).
- On page 5, starting at the statement "Remove stains from surfaces...", delete the language on that page and all of the followinOn page 7, in the 1<sup>st</sup> paragraph, delete the statement "This product has been shown to be bactericidal in the presence of 5% serum contamination. Although data was submitted to support this claim for a number of bacterial organisms, no information was submitted for Listeria monocytogenes. Staphylococcus auereus, and Salmonella enterica (Salmonella choleraesuis). Further, no data has been submitted to support that the product is effective against fungi and viruses. Therefore, EPA has determined that the proposed language did not fully address all the supported data as listed by this claim and thus, should be removed pages up to page 11 (See bullet 7 above).
- On page 7, in the 1<sup>st</sup> paragraph, delete the statement "This product has been shown to be bactericidal in the presence of 5% serum contamination. Although data was submitted to support this claim for a number of bacterial organisms, no information was submitted for Listeria monocytogenes. Staphylococcus auereus, and Salmonella enterica (Salmonella choleraesuis). Further, no data has been submitted to support that the product is effective against fungi and viruses. Therefore, EPA has determined that the proposed language did not fully address all the supported data as listed by this claim and thus, should be removed.
- On page 13, change "Safe Pesticide...Agency" to read "State Pesticide...Agency."

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) and section 4(a) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the accepted labeling is enclosed. Submit three copies of your final printed labeling to the Agency before distributing or selling the product bearing the revised labeling.

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

Sincerely,

if w I. Marshall Swindell

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



# Modec Decon Formulation Antibacterial Disinfectant and Cleaner

Cleaner Mildeworkt

Disinfectant Deodorizer Fungicide Algaecide Virucide

MDF-200 Part A - Active Ingredient:

Alkyl (50% C<sub>14</sub>, 10% C<sub>16</sub>, 40% C<sub>12</sub>,)

Total 100:0%

MDF 200 Part B - Active Ingredient:

### **DANGER**

#### KEEP OUT OF REACH OF CHILDREN.

Corrosive. Causes irreversible eye damage.
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

This is a proven disinfectant, cleaner, authorities, mildenside and virucide.

This product has been shown to control and inhibit mold and mildew on porous and nonporous surfaces.

#### **NET CONTENTS:**

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 1 2 2007

Under the Pederal Insecticide, Pungleide, and Rodenticide Act de amended, for the pesticide, registered under EPA Reg. No.

#### 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 and 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.

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



Sandia National Laboratories

ACCEPTED

with COMMENTS
in EPA Lener Dated:

Under the Federal Insecticide, Pingicide, and Rodenticide Act & amended, for the pesticide, registered under EPA Reg. No.

# **Modec 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 on Porous and nonporous Surfaces.
- Shown to be effective against the pathogenic bacteria Staphylococcus aureus, Salmonella choleraesuis, and Pseudomonas aeroginosa
- Cleans & Controls Mold Growth on Porous and Non-Porous Surfaces as listed on the label
- Cleaner, Mildewstat, Fungicide, Disinfectant, and Deodorizer
- Used harms Commercial Facilities

Before and After Photo plate 1

Photos of Before & Afer Photos of Before & After Photos of Before & After Photos of Before & After Photos of Before & After

#### 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 prevents mildew & fungus (the causative agent for 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 nonporous surfaces. This technology is used by professionals for remediation included the professionals.

wheels hames and commercial facilities.

siding

ACCEPTED

MDF 200 effectively cleans and disinfects all hard nonporous surfaces including those in basements and bathrooms as well as metal, plastic and ceramic HEPA Length Control of the control

SEP 1 2 2007

Under the Pederal Insecticitie, Pungloide, and Rodonticide Act de amended, for the pesticide, registered under EPA Rep. No. 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 sections basements, bathrooms, fences, walkways and any other place mold grows.

#### STOPS MOLD COLD

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

Professional recommend opproprieto eyo and respiratory appipment be worn when undertaking with buttoment procedures.

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

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.

ACCEPTED
with COMMENTS
to EPA Letter Dated:

When Applied as an Aerosol

Picture of Assemble General Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No

Photo Plate 3

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.

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

Remove stains from surfaces prior termold and midew treatment
MDF 200 may be used to clear surfaces. Spray liberally to con surfaces and allow to
remain wet for 30 minutes. Scrub surface with sponge terremove stains.

Mold Remediation Plean-up Mellous

Prior to application of MDR 200/ clean the affected area using one of the following or

Method 1: Yet Vacuum (in the case of porous material, some mold spores fragments will remain in the material but will post tow if the material is control tell died).

Method 2: Damp-wine surfaces with plan water or use a wood floor cleaner; serob as needed.

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

THE FOLLOWING ADDITIONAL PROFESSIONAL MOUD REMEDIATION INSTRUCTIONS ARE DEQUIRED FOR EXCLUSION OF SPECIFIC PHOTOGRAPHS ARE FOOTNOTED ONLY INCLUDE WITH LABORS WHICH INCLUDE PROFESSIONAL REMEDIATION INSTRUCTIONS

### [PROFESSIONAL REMEDIATION INSTRUCTIONS

Personal Protective Equipment (PRE):

Handlers prust wear

Long-sleeved short and long pants;

Shoes plus sooks;

> Projective eye wear;

> Waterproof sloves (come of the materials that are che dical-resistant to this product are barrier laminate, butyl rubber, pairile rubber, in observe rubber, polychylene, po

Follow manufacturer's instructions for cleaning/maintaining PPE. It no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Discara clothing and other absorbent materials that have been drencked or heavily contaminated with this product's concentrate. DO NOT reuse them.

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WITH COMMENTS

THE EPH Letter Dated

SEP 1 2 2007

Under the Pederal Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No

RU346-1

Use polyethylene sheeting ceiling to floor around affected area with a slit entry and covering flap; maintain area under negative pressure with LEFA filtered fan unit. Block apply and return air verts within containment area.

Total Surface Area Affected Greeker Than 1200 Square Feet or Potential for Increase Occupant or Remediator Exposure Buring Remediation Estimated to be Significant Usedwo layers of Are-retardant polyethylene sheeting with any airlock chamber. Maintain area under negative pressure with HVPA filtered fan exhausted omside of building. Block supply and return air vents within containment area.]

#### 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, cabinets, and walls of swimming pools. 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.

BACTERICIDAL ACTIVITY - When used as directed, this product exhibits effective disinfectant activity against the organisms: Staphylococcus aureus, including Methicillin-Resistant Staphylococcus to EPA Letter Dated.

SEP 1 2 2007

April 16, 2007

Under the Federal Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No

epidermidis, Salmonella choleraesuis, Pseudomonas aeruginosa, Klebsiella pneumoniae, Proteus mirabilis, Vancomycin-Resistant Enterococcus faecalis and Enterobacter aerogenes, Escherichia coli (0157:H7), Escherichia coli (ESBL), and Listeria monocytogenes. When uses as directed, this product is virucidal against Influenza A and Influenza B virus. This product meets the requirements for hospital use. This product has been shound to be be the prosence of the product in the prosence.

FUNGICIDAL ACTIVITY - This product has been demonstrated to be fungicidal against *Trichophyton mentagrophytes*, <u>Aspergillus niger and Penicillium</u> <u>variabile</u>. Use as directed on hard, non-porous surfaces.

MOLD and MILDEW CONTROL. This product controls mold and mildew on porous and hard nonporous surfaces. Clean the surface to be treated, then spray with the product, making sure to wet completely. Let the surface air dry but surface must remain wet for at least 10 minutes. 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.

**Swimming Pool Applications** 

When used as directed, this product may be used as an algaecide to treat walls of swimming pools

Mix equal parts of MDF 200 Part A and MDF 200 Part B prior to application.

Algaecide Use

After draining or before filling pool, spray and scrub walls with product. Allow to remain on surface for 30 minutes prior to rinsing.

To Clean by Spray Applications
with COMMENTS
in EPH Letter Dated

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Under the Pederal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 70346-1

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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.

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.

#### 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

MCCEPTED

MIN COMMENTS

to EPR Letter Dated:

SEP 1 2 2007

Under the Pederal Insecticide, Fungicide, and Rodenticide Act (as amended, for the pesticide, registered under EPA Reg. No. 80346-1

April 16, 2007

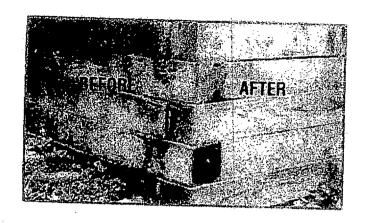


Photo Plate 1

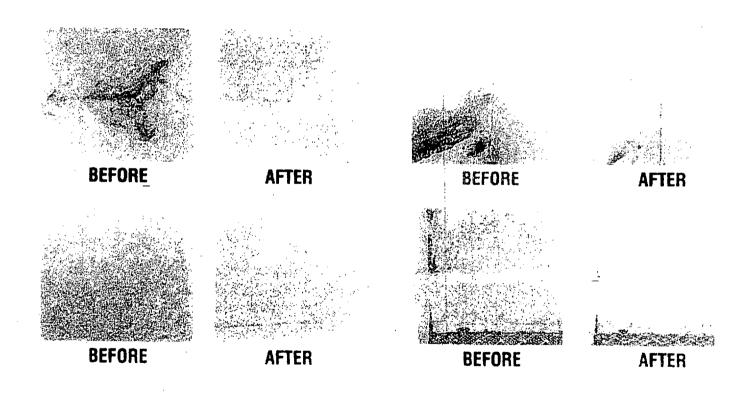


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with COMMENTS
in EPA Letter Dated:

SEP 1 2 2007

Under the Federal Insecticide, Fungicide, and Rodenticide Act do amended, for the pesticide, registered under EPA Reg. No. 80346-1

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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 with COMMENTS in EPA Letter Dated:

SEP 1 2 2007
Under the Federal Insecticide,
Prophide, and Rodenticide Act easing and Rodenticide, and according to the pesticide, as regularized under EPA Reg. No.

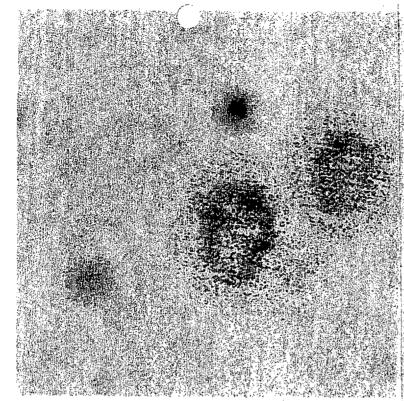
siding before Image\_0027,jpg



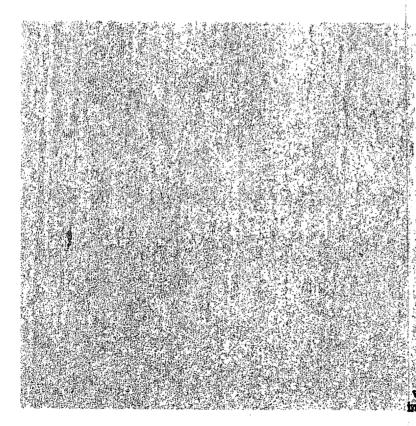
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SEP 1 2 2007

Under the Rederal Insecticities, Prograde, and Roderatelds Actes amended, for the pestable, registered under BFH Reg. No./



basement before 01302006 (7).jpg



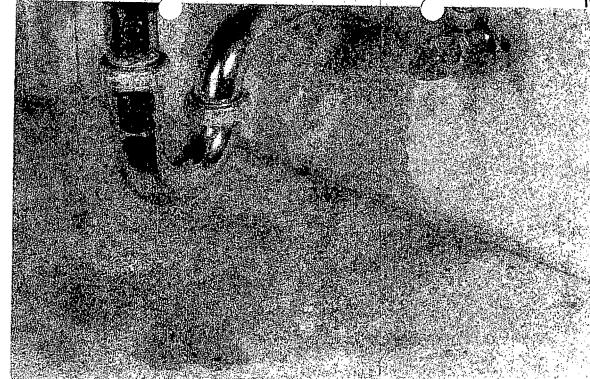


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recharged under EPA Reg. No.







sink before Image\_0077.jpg

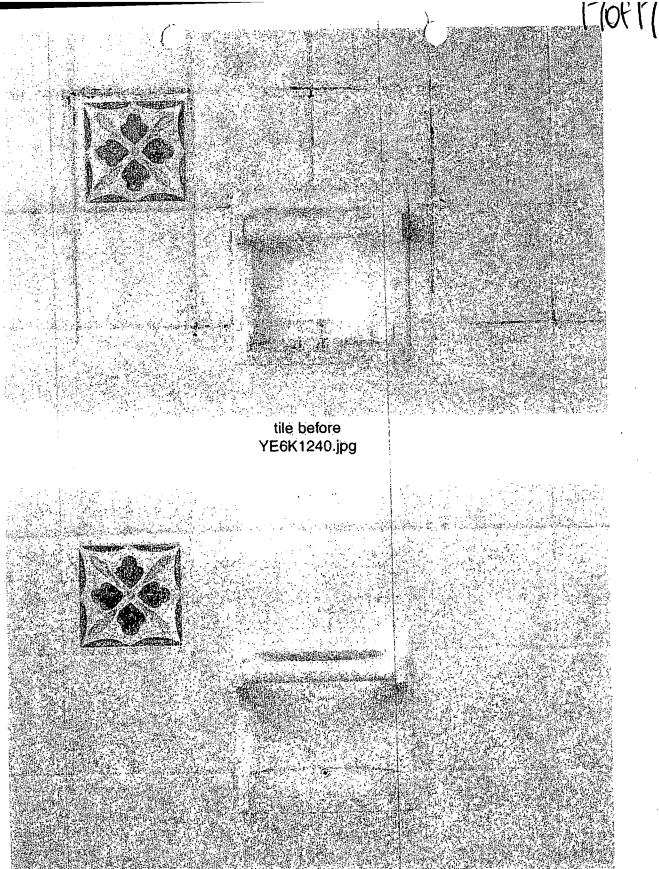


sink after with COMMENTS in EPA Letter Dated

Under the Federal Insecticide,
Punglicide, and Rodenticide Act es
amended, for the pesticide,
registered under EPA Reg. No.
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tile after YE6K1243.jpg

Under the Pederal Insecticide, Pungicide, and Rodenticide Act es amended, for the pesticide, registered under EPA Reg. No.

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