10/15/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 1 5 2010 OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Dr. Matthew Brooks Authorized Representative for Modec Ag-Chem Consulting Pesticide Science and Registration 12208 Quinque Lane Clifton, VA 20124

Subject: Modec Decon Formulation MDF-200 (Part B) EPA Registration Number 80346-2 Your Amendment Dated March 17th, 2010 EPA Received Date March 18th, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to revise the product labeling is acceptable provided you make the following labeling revisions:

On page 3 of the product labeling, delete the statement, "Effective biocide that cleans and restores basements, bathrooms, fences, walkways, and any place mold grows."

On page 3 of the product labeling, delete the statement, "Advanced Restoration, Remediation, & Antibacterial Disinfectant System from the product labeling. It implies that the product has heightened efficacy properties.

On page 3 of the product labeling, add the appropriate websites for mold abatement procedures.

On page 4 of the product labeling, delete the phrase, "Remove Mold the Easy Way."

On page 4 of the product labeling, delete the phrase, "Stops Mold Cold!" from the product labeling. It implies that the product has heightened efficacy properties.

On page 4 of the product labeling, revise the statement, "Inhibits the growth of mold, mildew, and fungal spores on wooden decks, cement, aluminum, wood siding, and other porous and nonporous surfaces" to read as follows, "Inhibits the growth of mold, and mildew, on wooden decks, cement, aluminum and wood siding and other porous and non-porous surfaces."

On page 4 of the product labeling, delete the statement, "Mold spores are ever-present in the environment and will grow when food and moisture are present." The labeling implies that the product is efficacious against any type of spore that exists in the environment.

On page 4 of the product labeling, delete the statement, "Clean and restores basements, bathrooms, fences, walkways, and any other place mold grows."

On page 4 of the product labeling, delete the statement(s), Bleach doe not kill mold! Bleach does not kill the fungal spores of mold. Bleach cannot penetrate porous surfaces like wood, drywall, grout, and concrete to reach the roots and spores of mold. Bleach corrodes when applied, weakening surfaces and fading colors." These are considered comparative claims.

A stamped copy of the labeling is enclosed.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

Marshall Swindell Product Manager 33 Regulatory Management Branch I Antimicrobials Division(7510P)



KEEP OUT OF REACH OF CHILDREN DANGER

Corrosive. Causes irreversible eye damage. See Back Panel for Additional Precautionary Statements

MDF-200 is a proven disinfectant, cleaner, fungicide, mildewstat and virucide (including Norovirus and H1N1). This product has been shown to control and inhibit mold and mildew on porous and nonporous surfaces.

NET CONTENTS: (1 gallon, 5 gallons, 250 gallons)

EPA REG. NO. 80346-2 (Part B) EPA EST. NO. 80346-CO-01 EPA EST. NO. 62001-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

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

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Under the Federal Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 803463

Sandia National Laboratories

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 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 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.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

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 evewear 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.

[] Denotes sections of optional language or instruction] [The following statements may or may not appear on some labels]

Advanced Chemistry for the Professional Remediator

Technology originally developed and patented by Sandia National Laboratories.

Modec MDF-200 is Produced Commercially using the Formula Licensed by Sandia National Laboratories

Broad spectrum biocidal activity

Foaming Action

- Inhibits and Retards Growth of Mold, Mildew and Fungus on Porous and hard nonporous Surfaces.
- Shown to be effective against the pathogenic bacteria Staphylococcus aureus, (including MRSA Staphylococcus) Salmonella enterica, and Pseudomonas aeruginosa
- Proven to be effective against Norovirus
- Cleans & Controls Mold Growth on Porous and hard Non-Porous Surfaces as listed on the label
- Cleaner, Mildewstat, Fungicide, Disinfectant, Virucide and Deodorizer.
- Used in Schools, Hospitals, Homes, and Commercial Facilities IF IED

Modec MDF-200 is a breakthrough product based on technology Lotten developed and patented by Sandia National Laboratories.

JUN 1 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 80346-2

Modec MDF-200 is commercially manufactured under a license from Sandia National Laboratories. Modec MDF-200 prevents mildew & fungus (the causative agent for Athletes's Foot, Tricohophyton mentagrophytes) on hard non porous surfaces and inhibits the growth of mold, mildew and fungal spores on stained wooden decks, aluminum siding, wood siding and other porous and non-porous surfaces.

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

Modec MDF-200 cleans and inhibits the growth of mold and mildew on painted fences, aluminum siding, painted and stained wood, painted walls, metal, plastic, planters boxes, and ceramic tile.

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

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- Foaming Action
- Coverage up to 200 sq. ft.
- Inhibits and Retards Growth of Mold, Mildew and Fungus
- Shown to be effective against the pathogenic bacteria Staphylococcus aureus, Salmonella enterica, and Pseudomonas aeruginosa
- Cleans & Controls Mold Growth on Porous and hard Non-Porous Surfaces
- Cleaner, Mildewstat, Fungicide, Disinfectant and Deodorizer
- This technology is Used by professionals for remediation in Schools, Hospitals, Homes, and Commercial Facilities
- Effective biocide that cleans and restores basements, bathrooms, fences, walkways and any place mold grows
- Advanced Restoration, Remediation & Antibacterial Disinfectant System
- New technology originally developed and patented by Sandia National Laboratories. Scott's Liquid Gold Mold Control 200® is produced commercially using the formula licensed by Sandia National Laboratories.
- Used by Professionals in Schools, Hospitals, Homes & Commercial Facilities
- Professionals recommend appropriate eye and respiratory equipment be worn when undertaking mold abatement procedures
- Propellant Cartridge: Aerosol Container, Spray-bridge & Dip Tube
- Part A
- Part B
- Mixing Bottle
- Insert
- {Pictures of each of the five named components}

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 30346-8

- A Serious Product for a Serious Problem
- Remove Mold the Easy Way
- Mix, Spray and Wipe Away
- STOPS MOLD COLD!
- Kills Mildew and Fungus
- Kills Mildew and Fungus, such as those that cause Athlete's Foot, on hard non porous surfaces
- Inhibits Mold and Fungal Spores
- Disinfects & Deodorizes
- For Indoors and Outdoors
- Scott's Liquid Gold Mold Control 200® is produced commercially using the formula licensed by Sandia National Laboratories
- Scott's Liquid Gold Mold Control 200® is a breakthrough product based on technology originally developed and patented by Sandia National Laboratories.
- Inhibits the growth of mold, mildew and fungal spores on wooden decks, cement, aluminum, wood siding and other porous and non porous surfaces
- Effectively cleans and disinfects all hard, nonporous surfaces including those in basements and bathrooms as well as metal, plastic and ceramic tile.
- Mold spores are ever-present in the environment and will with COMMERTING moisture are present EPA Letter Dated:
- Contents: Propellant Cartridge: Aerosol Container Net Wt. 1 (28 5) 2010
- Spray Bridge & Dip Tube
- Part A: 5 oz. (147 ml)
- Part B: 5 oz. (147 ml)

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 80346-3

- Mixing Bottle
- Cleans and inhibits the growth of mold and mildew on porous surfaces of fences, cement walkways, siding, wood, painted walls, stucco, planters boxes, and terracotta.
- Cleans and restores basements, bathrooms, fences, walkways and any other place mold grows.
- Remove Stains from surfaces prior to mold and mildew treatment. 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.
- Bleach does not kill mold! Bleach does not kill the fungal spores of mold. Bleach cannot penetrate porous surfaces like wood, drywall, grout and concrete to reach the roots and spores of mold. Bleach corrodes when applied, weakening surfaces and fading colors.]

[ATCC Numbers May not appear on labels]

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, hard nonporous cabinets, and walls of swimming pools. May be used in the kitchen on non-food contact surfaces. If used on food contact surfaces, rinse with potable water prior to food contact. 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.

[The following directions apply only to aerosol product applicators and appear only on labels equipped with such:

TO ASSEMBLE: - Scott's Liquid Gold Mold Control 200® is a two part system.

- 4. Fill empty mixing container with equal portions of Part A and Part B.
- 5. Securely screw mixing container onto the spray-bridge (dip-tube side).
- 6. Snap aerosol container onto the small end of spray-bridge, making sure container is firmly seated.

TO 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 are 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.]

MODEC DECON FORMULA USE DIRECTIONS – MDF-200 is a binary (two part) system. Part A is a surfactant formulation; Part B is a hydrogen peroxide based formulation. Thoroughly mix EQUAL VOLUMES of PART A and PART B. Apply the solution as a spray onto surfaces as directed below. Allow the production on the surface for 10 minutes. The mixed solution has an efficacious potents part of the part of the part of the solution below.

JUN 1 5 2010

Under the Federal Insec**ticide**, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 80346-2

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PRE-CLEANING - Prior to use on surfaces, remove gross filth, spray the mixture (Part A and Part B) onto the surface and allow to penetrate (about 2 minutes), and then clean thoroughly.

DISINFECTION – Follow Pre-Cleaning instructions listed above. To disinfect surfaces, apply the mixture and allow to remain wet with product for 10 minutes. No scrubbing is necessary. The product will not leave grit. The product exhibits disinfectant activity against Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa and Listeria monocytogenes and meets the requirements for hospital use. When used as directed, MDF-200 has been demonstrated to provide disinfection efficacy on hard non porous surfaces against the following organisms;

Organism	ATCC #
Staphylococcus aureus	6538
Methicillin-Resistant Staphylococcus aureus (MRSA Staphylococcus)	33592
Staphylococcus epidermidis	12228
Salmonella enterica	10708
Pseudomonas aeruginosa	15442
Klebsiella pneumoniae	4352
Proteus mirabilis	9240
Vancomycin-Resistant Enterococcus faecalis	51299
Enterobacter aerogenes	15038
Escherichia coli (0157:H7)	43888
Escherichia coli (ESBL)	BAA-196
Listeria monocytogenes	19117

VIRUCIDAL ACTIVITY – Follow Pre-Cleaning instructions listed above. To eliminate viruses on hard non-porous surfaces, apply the mixture and allow to remain wet for 10 minutes. This product is virucidal against Influenza Type A (including H1N1), Influenza Type B and Norovirus (Feline Calicivirus Surrogate). When used as directed, MDF-200 has been demonstrated to provide disinfection efficacy on hard non porous surfaces against the following viruses;

Virus	ATCC #
Influenza A	VR-544
Influenza B	VR-823vith COMMENTS
Norovirus (Feline Calcivirus Surrogate)	VR-782

JUN 1 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended. for the pesticide, registered under EPA Reg. No. 80346-2 **FUNGICIDAL ACTIVITY** – MDF-200 has been demonstrated to be fungicidal on hard non porous surfaces against *Trichophyton mentagrophytes (ATCC 9533), Aspergillus niger (ATCC 6275 and 1015)* and *Penicillium variabile (ATCC 52262).* Follow Pre-Cleaning instructions listed above and remove any mold that can be removed by hand. Apply a blended mixture of equal parts MDF-200 Part A and MDF-200 Part B as a spray onto a mold afflicted surface and allow to remain wet with product for 10 minutes.

Fungi	ATCC #
Trichophyton mentagrophytes	9533
Aspergillus niger	1644
Penicillium variabile	522620

FUNGISTATIC ACTIVITY – MDF-200 has been demonstrated to be fungistatic on porous and non-porous surfaces. Follow Pre-Cleaning instructions listed above and remove any mold that can be removed by hand. Apply a blended mixture of equal volumes of MDF-200 Part A and Part B to the affected surface until thoroughly wet. Allow surface to remain wet for at least 10 minutes. Let dry.

MOLD & MILDEW CONTROL – This product controls mold and mildew on porous and hard non-porous surfaces. Follow Pre-Cleaning instructions listed above, then spray with the product, making sure to wet completely. Let the surface air dry but the surface must remain wet for at least 10 minutes. Reapply as necessary.

DEODORIZING – MDF-200 is an effective deodorizer when applied to areas affected with:

- Pet odors
- Food odors
- Putrefying odors
- Smoke odors

Always check fabric surfaces for colorfastness when applying MDF-200. Remove gross filth. 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.

SWIMMING POOL APPLICATIONS - When used as directed, this product may be used as an algaecide to treat walls of swimming pools.

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

REMOVES STAINS FROM SURFACES - MDF-200 may be used to **BGGEBHEDS**. Mix 4 ounces of MDF PART A and Part B into one gallon of water: With G POMMENTS coat surfaces and allow to remain wet for 30 minutes. Scrub surface With Spon Dated: remove stains.

Master March 16, 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. SO346-2,

SPRAYING – Mix equal parts of PART A and PART B directly into ULV spray Apply mixed product at a rate of no less than 1 ounce to 100-sq. ft. of equipment. 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.

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

CONTAINER DISPOSAL – Nonrefillable container. Do not reuse or refill this container. Wrap container and put in trash.

PESTICIDE DISPOSAL – Pesticide wastes are acutely hazardous. Triple rinse or pressure rinse (or equivalent) 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 flow begins to drip. Repeat this procedure two or more times.

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ACCEPTED with COMMENTS EPA Letter Dated: JUN 1 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 80346-3



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Photo Plate 1



Photo Plate 2

ACCEPTED with COMMENTS * EPA Letter Dated:

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JUN 1 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 80346-2,



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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. 120f11

Photo Plate 3

ACCEPTED with COMMENTS * EPA Letter Dated: JUN 1 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 346-3



siding before Image_0027.jpg



ACCEPTED with COMMENTS EPA Letter Dated:

JUN 1 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 8039

siding after 01302006 (6).jpg



tile before YE6K1240.jpg





JUN 1 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act asamended, for the pesticide, registered under EPA Reg. No. 70346-7

tile after YE6K1243.jpg

Plate 2