

81446-2

8/26/2014

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

AUG 26 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

R. Bruce Jaeger
Agent for Chem-Tex Laboratories
Health & Environmental Horizons, Ltd
2851 South Haven Road
Annapolis, MD 21401

Subject: BacShield RTU
EPA Registration No.81446-2,
Amendment Date: May 23, 2014
EPA Receipt Date: May 30, 2014

Dear Mr. Jaeger:

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

Proposed Amendment:

- Revised labeling per Agency letter dated April 7, 2014

General Comments

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions concerning this letter, please contact me by telephone at (703) 308-6416 or by e-mail at hardy.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at grigsby.stacey@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jacqueline Hardy".

Jacqueline Hardy
Product Manager

Regulatory Management Branch II
Antimicrobials Division (7510P)

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BacShield RTU™ Ready-to-Use

Antimicrobial for Textiles and Surfaces

Inhibits Growth and Odor from Bacteria, Mold, Mildew and Fungi

ACTIVE INGREDIENT:

Chitosan

ACCEPTED

08/26/2014

Under the Federal Insecticide, Fungicide,
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 81446-2

% w/w

0.3%

OTHER INGREDIENTS:

99.7%

Total

100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

FIRST AID STATEMENTS

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.

Have the product container or label with you when calling a poison control center or doctor, or going to receive treatment.

EPA Reg. No. 81446-2

Net Contents: 1 Qt [32 Fl Oz] 1 Gal. [128 Fl. Oz] 5 gal.

EPA Est. No. 081446-NC-001

Chem-Tex Laboratories, Inc.
2725 Armentrout Dr
Concord, NC 28025

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ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of 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 into sewer without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or regional Office of the EPA.

NOTICE OF WARRANTY

Chem-Tex Laboratories, Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with the label directions under normal conditions of use. Chem-Tex Laboratories, Inc. makes no other express or implied warranties either of merchantability or fitness for a particular use. Handling, storage and use of the product by Buyer or User are beyond the control of Chem-Tex Laboratories, Inc. and Seller. Risks such as ineffectiveness or other unintended consequences resulting from, but not limited to, failure to follow label directions will be assumed by the Buyer or User. In no case will Chem-Tex Laboratories, Inc. or Seller be held liable for consequential, special or indirect damages resulting from the handling, storage or use of this product.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

Produced by:
Chem-Tex Laboratories, Inc.
2725 Armentrout Dr
Concord, NC 28025

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DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. BacShield RTU is intended as a treatment in order to give antimicrobial and antifungal activity to the treated materials.

BacShield RTU inhibits the growth of non-public health related organisms such as bacteria, mold, mildew and fungus that cause odor, stains, discoloration, decay and deterioration of the treated materials.

Distributors of products containing BacShield RTU may not make claims of antimicrobial activity other than the protection of the treated material against the growth of bacteria, mold, mildew and fungi that cause odor, stains, discoloration, decay, and deterioration in or on the treated product.

See 40 C.F.R.152.25 (a) for further guidance about treated article claims.

DOMESTIC USES

As A Cleaner:

BacShield RTU may be used as a cleaner to remove [odor-causing bacteria], [mold], [mildew], and [other organic matter] from surfaces [materials] prior to subsequent [treatment] [application] to inhibit [prevent] bacterial and [or] fungal [mold] growth on those surfaces [and] [or] [materials]. [Thoroughly clean the material to be treated by spraying this product and letting it sit for 1-2 minutes. Wipe or scrub clean.]

Note: Always test for staining in an inconspicuous area. BacShield RTU should not stain articles not stained by water alone.

Laundry:

As an after-wash treatment for clothing, linens, uniforms, textiles in general:

Remove laundry from washer after final spin cycle.

Spray each article with BacShield RTU solution.

BacShield RTU may also be applied to articles which have been previously washed and dried.

Dry treated articles thoroughly before use.

Apply to each load.

Application Methods: BacShield RTU may be applied by hand sprayer, garden sprayer, airless/compression sprayer, cold-fogger, steam cleaner, brush roller, cloth, or immersion. For all applications use RTU product in place of water to fill the applicator reservoir.

Porous Surfaces:

As a spray for textiles, and other porous surfaces such as but not limited to: awnings, bedding, car covers, boat covers, curtains, drapes, linens, mattresses, pet bedding, pillows, shoes, umbrellas, upholstery, vehicle interiors, textile wall partitions and other household or construction materials. Construction materials such as paper, ceilings, wood, wallboard, masonry, particle board, and other building

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materials must be sealed and/or painted before applying BacShield RTU. The use of a sealant such as BacCote (Chemtex Labs 800-532-5361) in combination with BacShield RTU will provide a sealed surface.

Areas to be treated with BacShield RTU must be thoroughly cleaned to remove dirt, mold, mildew, fungi, or other organic matter. BacShield RTU can be used as a cleaner prior to subsequent treatment [application] with [of] BacShield RTU.

See section titled "Cleaning with BacShield RTU" for instructions in using BacShield RTU as a cleaner

Apply BacShield RTU until the surface is thoroughly damp. One gallon of solution covers approximately 270 sq. ft. Allow to dry before use.

Carpeting (indoor and outdoor): Apply to clean carpet as a spray or mist. One gallon of solution covers approximately 270 square feet of surface area. Allow to dry before use.

In homes, offices, commercial, industrial and hospitality settings apply BacShield RTU each time carpet is cleaned or as needed for odors due to mold, mildew, fungi, or bacteria.

Re-apply BacShield RTU after each carpet cleaning.

In athletic facilities, carpet must be cleaned regularly and BacShield RTU applied weekly.

For heavier weight carpets (such as synthetic turf): Apply BacShield RTU as a spray at a rate of 1 gallon of solution per 270 square feet. Allow to dry before use. Apply every three months

Vehicle interiors: Spray 3 fl. oz. of BacShield RTU [solution] per average size car. Use more solution to cover larger vehicles.

Non-Food Hard Contact Surfaces:

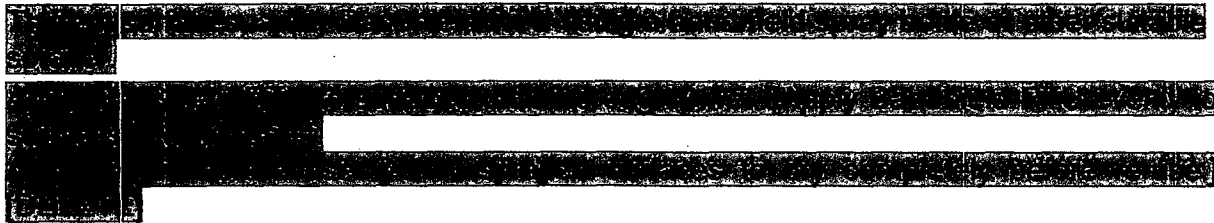
As a spray or mist for non-food hard contact surfaces, such as, but not limited to: fiberglass, metal, vinyl, garbage cans, laminated surfaces, desks, window sills and sealed and/or painted surfaces (such as masonry, particle board and wood), and other interior and exterior surfaces:

Areas to be treated with BacShield RTU must be thoroughly cleaned to remove dirt, mold, mildew, fungi, or other organic matter. BacShield RTU can be used as a cleaner prior to subsequent treatment [application] with [of] BacShield RTU. [Thoroughly clean the material to be treated by spraying this product and letting it sit for 1-2 minutes Wipe or scrub clean.]

See section titled "Cleaning with BacShield RTU" for instructions in using BacShield RTU as a cleaner



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After all foreign matter is removed from surface, apply BacShield RTU evenly to surfaces until thoroughly wet. Avoid runoff. Allow sprayed surfaces to dry completely before re-use.]

PROFESSIONAL APPLICATORS – DIRECTIONS FOR USE

Professional Mold Remediators Refer to Section Titled “Mold/Mildew Remediation and Prevention” or call Chemtex Laboratories @ 800-532-5361 for specific questions.

Mold /Mildew Remediation and Prevention

Note: The information contained in this section is not intended to provide comprehensive instructions for mold removal and remediation, but is intended as a general guide for mold removal and prevention and to provide sources for additional information pertaining to mold, mold removal, and prevention. Mold can have serious health consequences in certain individuals. Consult a certified professional mold remediator for areas larger than 30 square feet.

“A Brief Guide to Mold, Moisture and Your Home”

<http://www.epa.gov/mold/moldcleanup.html>

Mold Cleanup Guidelines

<http://www.epa.gov/mold/cleanupguidelines.html>

Institute of Inspection, Cleaning and Restoration Certification (IICRC)

(360) 693-5675

www.iicrc.org EXIT Disclaimer

Information on and standards for the inspection, cleaning, and restoration industry

Centers for Disease Control and Prevention (CDC)

(800) 311-3435

www.cdc.gov EXIT Disclaimer

The New York City Department of Health and Mental Hygiene (212) 788-4290 / 4288.

Guidelines on Assessment and Remediation of Fungi in Indoor Environments EXIT Disclaimer

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What to Wear When Cleaning Moldy Areas <http://www.epa.gov/mold/whattowear.html>

Please note that the Occupational Safety and Health Administration (OSHA) requires that respirators fit properly (fit testing) when used in an occupational setting; consult OSHA for more information (800-321-OSHA or www.osha.gov).

Hidden Mold

<http://www.epa.gov/mold/hiddenmold.html#CleanupandBiocides>

Recommended Web Sites for Mold Removal/Remediation Information:

NORMI -- National Organization for Remediators and Mold Inspectors
www.normi.org

Indoor Air Quality Association Inc
www.iaqa.org

Chemtex Laboratories Inc
www.bacshield.com

EPA -- Environmental protection Agency
www.epa.gov

IICRC -- Institute of Inspection, Cleaning and Restoration Certification
www.iicrc.org

Mold [Removal] [and] [or] [Prevention]

If mold is present refer to recommended web sites for accepted remediation practices. Refer to section titled "PPE- Personal Protection Equipment for Applicators" for appropriate protective equipment to wear.

BacShield RTU may be applied by hand sprayer, garden sprayer, airless/compression sprayer, cold-fogger, steam cleaner, brush, roller, cloth, or immersion.

Small Areas - Affected surface areas less than 30 square feet

If the affected area is easily replaceable, such as ceiling tiles, remove the [panel] [area], place in a trash bag, seal, and dispose of in normal trash. Area to be removed can be sprayed with BacShield RTU prior to removal to reduce likelihood of airborne spores. If the affected area cannot be easily removed, follow these steps.

- [1] Eliminate [correct] any sources of water [moisture] that may be causing mold growth.
- [2] Remove excess water from area and dry affected area thoroughly

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[3] Clean affected area with BacShield RTU or other appropriate cleaner [procedure] to remove mold, soil and any other organic matter from surface. In many instances, BacShield RTU will not remove mold stains. Aggressive scrubbing, up to and including partial substrate removal may be required to remove stains.

[4] Apply BacShield RTU until surface is evenly wet. If area was wet for more than 24 hours prior to removal of mold, allow area to dry thoroughly following first application, and then make a second application.

[5] Allow treated surfaces to dry completely before covering.

Large Areas – Affected surfaces area larger than 30 square feet

Areas larger than 30 square feet require specific procedures performed by professionals properly trained in mold remediation.

Refer to the recommended web sites for assistance in locating a certified mold inspector and/ or remediator or call Chemtex Laboratories @ 800-532-5361 for assistance.

If you are properly trained in mold remediation, develop a complete assessment and remediation plan incorporating BacShield RTU to [prevent] inhibit future mold [fungal] [and] [or] [bacterial] growth.

Once the water source has been eliminated [corrected] and the surfaces properly cleaned and prepared, apply BacShield RTU until the surface is evenly wet. When properly applied, one gallon of BacShield RTU solution will cover 270-1000 square feet of surface area, depending upon the surface texture and absorbency of the substrate. Extremely porous substrates such as carpet and heavy textiles require more product per square foot and one gallon of solution would be expected to cover approximately 270 square feet. Substrates such as unpainted wood will require the use of a sealant such as BacCote (Chemtex Labs 800-532-5361) and will require approximately one gallon of solution per 600 -800 square feet of surface area. Painted wood, vinyl, fiberglass and similar substrates will require approximately one gallon per 1000 -1500 square feet of surface area.

For substrates that are prone to beading and significant run-off, such as vinyl and sealed and/or painted surfaces. The use of a sealant such as BacCote (Chemtex Labs 800-532-5361) in combination with BacShield RTU will improve coverage, reduce runoff and provide a sealed surface.

Very small droplets such as in fine sprays, mists and fog will minimize run-off. Several light applications rather than one heavy application will reduce run-off.

If affected area was wet for more than 24 hours prior to removal of mold, allow area to dry thoroughly following first application of BacShield RTU, and then make a second application. Allow treated surfaces to dry completely before covering.

Cleaning [Preparing the Surface] with BacShield RTU

[1] Apply BacShield RTU until area to be cleaned is thoroughly wet.

[2] Wipe or scrub area to loosen mold [dirt] [soil] [organic matter]

[3] Wipe with rag [cloth] to remove mold [dirt] [soil] [organic matter] from surface and

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dispose of rag [cloth]

Protecting the Surface with BacShield RTU

- [1] Apply BacShield RTU to cleaned area until surface is thoroughly wet.
- [2] Allow area to dry completely to inhibit [prevent] future growth of mold [and] [or] [odor-causing bacteria].

Prevention of Future Growth

- [1] Monitor and maintain moisture levels at or below 17% in wood and other cellulosic materials
- [2] Minimize [reduce] high humidity levels in areas such as crawl spaces. De-humidifiers may be beneficial in high humidity areas. If de-humidifiers are used, make certain drain lines are piped to the outside.
- [3] Correct [Eliminate] source [sources] of water intrusion[s].
- [4] Keep surfaces free of dust, dirt and other organic matter where feasible.

PPE – Personal Protection Equipment Requirements for Applicators

Mold Applications:

Small Areas - Less than 30 square feet: Gloves, protective eye wear [goggles] and a NIOSH approved N-95 respirator to prevent exposure to mold [and] [or] [mold spores].

Large Areas – more than 30 square feet: Gloves, protective eye wear [goggles], disposable protective suit [coveralls], NIOSH approved N-95 respirator or half-face respirator with HEPA filter as specified by mold remediation certification training.

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE:

Store in original container in a cool, dry place, away from sunlight and out of the reach of children and pets.

PESTICIDE DISPOSAL:

Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:

Non-refillable container. Do not reuse or refill this container.

Containers less than 5 gallons.

Triple rinse as follows: Empty remaining contents into application equipment or mix tank and drain for 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. Repeat this procedure two more times.

Containers greater than 5 gallons.

Triple rinse as follows: Empty remaining contents into application equipment or mix tank. Fill the container ¼ full with water and recap. 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 side and tip it back and forth several times. Empty the rinsate into application equipment or mix tank or store for later use or disposal. Repeat this procedure two more times.

BULK CONTAINERS:

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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MARKETING BULLETS:

Use On:

Apparel:

- Athletic uniforms
- Uniforms: military; law enforcement; nursing
- Work attire
- Athletic clothing
- Body Armour (bullet proof vests)
- Soles/insoles

Athletic/Sports Equipment/Locker Rooms/Training Facilities:

- Exercise equipment
- Exercise mats
- Wrestling mats/protective headgear
- Blocking pads/dummies
- Playing surfaces: wood, plastic, vinyl, carpet

All Athletic Equipment, head to toe

Sports equipment

Vehicle Interiors: all automobiles

Cars, trucks, busses, trains, airplanes

Boat interiors

Boat covers

Synthetic Turf

Synthetic Putting Greens

Indoor/outdoor carpet

Non-food hard contact surfaces

Carpets

Use Outdoors

Vinyl siding

Vinyl fencing

Awnings

Outdoor Upholstery

Outdoor Furniture

Masonry: sealed and/or painted

Wood: sealed and/or painted

Exterior Fabric Protectors

Carpets

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Use Indoors:

- Curtains, Drapes
- Mattresses
- Bedding Products
- Wall Board, sealed and/or painted
- Upholstery
- Carpet
- Locker rooms
- Easy to use in laundry and a convenient spray bottle
- Odor causing bacteria anti-microbial
- Protects treated article from mold.
- Protects treated article from mildew.
- Inhibits the growth of bacteria which may cause odor, stains, decay, deterioration, or discoloration in/on treated article
- Inhibits the growth of mold/mildew/fungi which may cause odor, stains, decay, deterioration, or discoloration in/on treated article
- BacShield RTU makes your cleaning program more effective.
- Bacteria Inhibitor
- Fungi Inhibitor
- Mold/Mildew Inhibitor
- Inhibits growth from bacteria
- Bacteria growth inhibitor
- Prevents bacterial growth
- Inhibits the growth of mold and mildew
- Dries on the surface to create an invisible antimicrobial shield
- Acts as an invisible barrier to mold and mildew growth
- Creates a shield against mold and mildew
- Water resistant when dry
- Contains No Phosphates
- Ammonia free
- Bleach free
- Low Vocs
- Contains No Ammonia
- Contains No Butyl
- No fumes
- No dilution! Ready-To-Use!
- Indoor and Outdoor Use!
- Cleans and protects!
- Derived from crab shells
- Mold Cleaner and Protectant
- Reduces Mold Spores that could cause musty, mold and mildew related odors
- Provides long lasting protection
- Easy to use in laundry and a convenient spray bottle.
- By-product of the fishing/crabbing industry

Chitosan is commercially available for use in antimicrobial products from recycled crab, shrimp and squid shells.

Chitosan is commercially available for use in antimicrobial products from recycled shrimp and squid shells.

Chitosan, the active ingredient in BacShield RTU, is commercially produced from recycled crab, shrimp and squid shell waste.

Chitosan, the active ingredient in BacShield RTU, is commercially produced from recycled crab shell waste.

Chitosan, the active ingredient in BacShield RTU, is derived from waste shrimp shells.

Chitosan, the active ingredient in BacShield RTU, is derived from waste squid shells.

Chitosan, the active ingredient in BacShield RTU is derived from waste snow crab shells.

Chitosan (Poly-D-Glucosamine) is a polysaccharide, a long chain of glucose molecules.

BacShield RTU is formulated with chitosan, a glucose polymer.

BacShield RTU is formulated with chitosan, a polysaccharide.

BacShield RTU is formulated with chitosan, a crab shell constituent.

Crab shell waste is a commercial source of Chitosan.

BacShield RTU is formulated with chitosan, a structural component of crab shells.

BacShield RTU is formulated with chitosan, a structural component of shrimp shells.

BacShield RTU is formulated with chitosan, a structural component of squid shells.

Active ingredient is chitosan

Antimicrobial made from chitosan.

Chitosan-based antimicrobial

Antimicrobial made from chitin

Chitin-based antimicrobial

Antimicrobial for odor-causing fungi

Antimicrobial for mold

Antimicrobial for mildew

Antimicrobial for odor-causing mold

Antimicrobial for odor-causing mildew

Use in boats, cruise ships, homes, attics, basements, laundry rooms, closets, institutions, business, schools, health clubs, transportation terminals, and recreational vehicles (RVs), apartments, workshops, trailers, carports, porches, camping equipment and other household areas.

Thoroughly clean the material to be treated by spraying this product and letting it sit for 1-2 minutes. Apply Bac-Shield RTU evenly to surfaces. Hold spray 6 to 8 inches away from surface and spray until damp. Wipe or scrub clean. Allow sprayed surfaces to dry completely before reuse.

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Please refer to www.bacshield.com to obtain more information regarding our corporate commitment to sustainability. For a comprehensive evaluation of the active ingredient, chitosan, with regard to sustainability, biodegradation, ecological effects, environmental contributions and other biological effects, visit www.bacshield.com. For a comprehensive evaluation of Chitin and Chitosan, additional documents can be found in EPA's public docket (Docket #EPA-HQ-2007-0566, Chitin Case 6063) at www.regulations.gov.