



82552-1

4/25/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 25, 2007

Ann M. Cozad
Scientific & Regulatory Consultants, Inc.
The Agent for
Siamons International, Inc.
P.O.Box 1014
Columbia City, IN 46725

Subject: Product Name: Concrobium
EPA Registration No.: 82552-1
Application Dated: 22-Aug-2006
Receipt Date: 08-Aug-2006

Dear Ms. Cozad:

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 with the following comments.

Proposed Amendment:

- Label amendment: Add claim for mold prevention on fabric surface

General label comments:

1. On page 4 of the draft labeling, delete the term "*most surfaces*".

A stamped copy of the accepted labeling is enclosed.

Should you have any questions or comments concerning this letter, please contact me by telephone at (703) 308-6422 or email address at: heyward.adam@epa.gov, or Renae Whitaker by telephone at (703) 308-7003 or email address at: whitaker.renae@epa.gov.

Sincerely,

Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosures: stamped label, RASSB memo.

CONCROBIUM

ACTIVE INGREDIENT

Sodium Carbonate.....0.95%
OTHER INGREDIENTS.....99.05%
TOTAL.....100.00%

KEEP OUT OF REACH OF CHILDREN

Net Contents 22 oz. (660 ml)
1 quart (946 ml)
1 gallon (3.8 L)
1 gallon 7 oz. (4 L)
5 gallon 1 quart 4 oz. (20 L)
20 gallon (75.708 L)
55 gallon (208.175 L)

EPA Reg. No. 82552-1 EPA Est. No. XXXXX-XX-XX

Sold by Siamons International Inc.
36 Meteor Drive, Toronto, ON M9W 1A4
Toronto, Canada

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

APR 25 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 82552-1

{Optional marketing claims, may be used on any panel} {General claims}

For Mold Prevention {in box}

- [Eliminates,] [and] [Prevents] mold [and] [mildew,] [fungi,] [staining,] [and associated staining]
- Prevents [future] mold [and mildew] [problems]
- Eliminates [and prevents] mold [growth][problems]
- [Controls] [Prevents] [Inhibits] [fungi] [mildew] [mold] [mold and mildew]
- [Stops] [Controls] [Prevents] [Inhibits] [the growth of] [fungi] [mildew] [mold] [mold and mildew] [growth] [and their odors] [and their stains] on [hard surfaces] [fabrics] [upholstery] [clothing] [curtains] [cushions] [animal bedding]
- Effective against [fungi] [mildew] [mold] [mold and mildew] [mold and mildew stains]
- Eliminates mold [musty] odor [stains] [caused by mold and mildew]
- Contains no ammonia, bleach, alcohol, acid, or VOCs
- [Suitable] for [use on] most [indoor] surfaces [including fabrics] [upholstery] [clothing] [curtains] [cushions] [animal bedding]
- [Hard Surface] [Fabric] Fungistat [and] [Hard Surface] Mildewstat
- Odorless [and] colorless
- Mold Control
- CONCROBIUM's patented [breakthrough] technology prevents mold [and mildew] growth. [Treated surfaces retain a protective barrier [that [will] prevent[s] the growth of mold and mildew.]]
- Concrobium dries on surfaces to create an invisible antimicrobial shield that [eliminates mold [and mildew]] [problems,] [inhibits the growth of mold] [and] [fungal spores] [fungi,] [prevents new [mold] growth] [and] [eliminates] [gets rid of] [wipes out] [musty] odors. Concrobium contains no [bleach,] [ammonia,] [alcohol,] [acids,] [or] [other] [VOCs] [and is suitable for use on most surfaces.]
- Use Concrobium [to [eliminate] [mold problems] [and prevent mold] [problems] [control mold] in [the following [vulnerable] areas] [basements,] [bathrooms,] [closets] [and] [around windows.]
- For use on [the following] [non-porous] [semi-porous] [porous] [hard] [and fabric] surfaces [wallboard,] [plaster,] [wood,] [metal,] [masonry,] [concrete,] [tile,] [curtains,] [slipcovers,] [upholstery,] [cushions,] [clothing,] [and] [animal bedding].
- CONCROBIUM is [specially formulated] [a unique technology] for effective [control] of [most] offensive [stains] [odors] caused by mold and mildew.
- Controls [Inhibits] mold and mildew [leaving a fresh clean scent] [leaving rooms clean and fresh smelling].
- Helps prevent mold [growth] [in] [on] [surfaces] [places vulnerable to mold], [including:]
 - Basements
 - Bathrooms
 - Vacation homes
 - Boat interiors
 - Areas under construction
- For use in homes, businesses or institutions.
- No fumes
- Not flammable
- Deodorizer
- [Also] available in 1 [gal] [Gallon] and 20 [gal] [Gallon] sizes [for larger areas]
- Eliminates [kills] [musty] [foul] [stale] odors [from] [gym] [sports] [hockey] [football] [baseball] [baseball] [basketball] [athletic] [equipment] [lockers]
- Concrobium eliminates odor-causing particles [fungi and mold], [eliminating] [getting rid of] [killing] [reducing] [the] [that] [musty] [stale] [foul] [odor] [smell].
- [For] [Use] [on] [in] [gym] [sports] [hockey] [football] [baseball] [baseball] [basketball] [athletic] [equipment] [lockers]
- No mixing required.
- Ready to use
- Easy to use
- For use on [fabrics] [upholstery] [clothing] [curtains] [cushions] [animal bedding] [too]

Note: Bracketed [] information is optional text. Text separated by a comma (,) denotes—and/or-options.
{Bracketed Text} is for administrative purposes only and will not appear on the printed label.

- Works on [fabrics] [upholstery] [clothing] [curtains] [cushions] [animal bedding] [too]
- Now for [fabrics] [upholstery] [clothing] [curtains] [cushions] [animal bedding] [too] *{Claim to be removed after the first six months}*
- No bleach. No ammonia. No mold. No problem.
- Break the mold.
- Ditch the bleach.
- [Also] an effective cleaner and degreaser.
- Try it as a cleaner and degreaser.
- [Great for] [Try it for] spot cleaning and degreasing [too].
- [Eliminates] [removes] [stubborn] [tough] stains and grease [too].

IDEAL FOR [CAN BE USED FOR] [FOR]

- Mold prevention in homes, businesses and institutions
- Pre-treatment of building materials for mold resistance
- [DIY] [Do-it-yourself] mold prevention
- New construction protection
- *{Insert one of the surfaces and/or sites listed on page 4 of this label}*

{Remedial related claims}

Encapsulates mold spores *{icon}*

For Mold Remediation and Prevention *{in box}*

- [Cleans,] [Removes,] [Eliminates,] [and] [Prevents] mold [and] [mildew,] [fungi,] [staining,] [and associated staining]
- [Cleans,] [Remediates] [and Prevents] mold [and mildew] [all-in-one]
- Eliminates existing [mold] [problems] and prevents future [mold] [problems]
- Get[s] rid of mold
- Wipe[s] out mold
- Wherever mold takes hold
- [Stops] [Cleans and] [Controls] [Prevents] [Inhibits] the growth of [fungi] [mildew] [mold] [mold and mildew] [and their odors] [and their stains] on [hard surfaces] [fabrics] [upholstery] [clothing] [curtains] [cushions] [animal bedding]
- CONCROBIUM's patented [breakthrough] technology encapsulates mold and fungal spores with a microscopic coating that inhibits [and prevents] its growth. [Treated surfaces retain a protective barrier that will prevent the growth of mold and mildew.]
- Concrobium dries on surfaces to create an invisible antimicrobial shield that [encapsulates and] inhibits the growth of mold [and] [fungal] [spores] [fungi], prevents new [mold] growth and eliminates [musty] odors. Concrobium contains no [bleach,] [ammonia,] [alcohol,] [acids,] [or] [other] [VOCs] [and is suitable for use on most surfaces.]

IDEAL FOR [CAN BE USED FOR] [FOR]

- Mold remediation in homes, businesses and institutions
- Mold prevention following flooding or water damage cleanup
- [DIY] [Do-it-yourself] mold clean-up and prevention
- Professional mold remediation
- *{Insert one of the surfaces and/or sites listed on page 4 of this label}*

[Surfaces:]

Bathroom Basins	[Glazed] Ceramic [tile]	Plastic Laminate
Bathroom Surfaces	[Glazed] Porcelain [tile]	Plastic Mattress Cover
Bathroom Tile	Hard [non-porous] surfaces	Plexiglass®
[Fiberglass] Bathtub [Tub]	Hard [Plastic] surfaces	Portable Toilet
Bed Frames	Laminated Surfaces	Recycle Bin
Bed Springs	Lamps	Resilient Flooring
Bidet	Linoleum	Shower [Stall] [Area]
Cabinets	Lockers	Shower [Curtain] [plastic] [liner]
Cat Litter Box	Louvers	[Under] Sink [Basin]
Chairs	Marble [Cultured]	[Sealed] granite
Desks	Marble [Synthetic]	Slate
Diaper Pails	Marlite	Sports Equipment
Dorm	Mattresses	Stainless Steel
Enamel	Metal Blinds	Toilet / Urinal exteriors
Fabric [surfaces]	Mirrors	[around] Toilet Areas
Fixtures	No wax floors	Vinyl [tile]
Garage Surface	Parquet	[Washable] Walls
Garbage Can [Pail]	Plastic Laundry [basket] hamper	Windows
		Windowsill [non-wood]

[Household Use Sites]

Attic	Dining Room	Laundry Room	RV's
Basement	Dorm	Living Room	[damp] Storage Area [Room]
Bathroom	Family Room	Mobile Home	Storage Building
Bedroom	Farmhouse	Mud Room	Summer Cottage
Boat Interior	Garage	Nursery	Sunroom
Camper Interior	Home / House	Other Household Areas	Tool Shed
Closet	Home Workshop	Pet Areas	Trailer
Den / Study	Household [Areas]	Playroom	Vacation Home
			Workshop

[Professional Use Sites]

Airplane Interior	Industrial Building	Public Factory
Airports	Institution	[Public] [Restroom]
Attic	[Institutional] [Bathroom] [restroom]	Public telephone booth
Bowling Alley	[Institutional] [Laundromat]	Recreational Center [facility]
Business [building]	Kennel	School [College]
Closet	Laboratory	Shelter
Commercial Building	Manufacturing Plant	Storage Area [Room]
Day Care Center	Military Installation	Tack Shops
Dressing rooms	Office [Building]	Toll Booth
Factory	Pet areas	Train Interior
Gymnasium	Pet Shops	Utility Rooms
Health Care Facility	Pharmacy	Waiting Room
Health Club	Public Facility	Warehouse Club
Hotel / Motel		

DIRECTIONS FOR USE

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

MOLD AND MILDEW CONTROL ON WOOD, WALLBOARD, FABRIC, CONCRETE AND MASONRY (CINDER) BLOCK, AND CONSTRUCTION MATERIALS IN BUILDINGS

Concrobium inhibits [or] [prevents] mold [mildew] organisms [growth] on wood, wallboard, concrete, masonry (cinder) block, fabric and building materials that have been subjected to [moist or] wet environments. Before applying [this product], remove visible mold growth and correct conditions favorable to mold growth.

READ LABEL BEFORE USING

[Ready to use – do not dilute.]

[Concrobium is suitable for use on most surfaces. If in doubt, [perform a] test on a small, [inconspicuous] section. Wipe materials vulnerable to water marks immediately after contact with Concrobium. Over-application may result in residue formation, which can be easily wiped away with a Concrobium-dampened cloth.]

Apply [Concrobium] by cloth, hand-spray, electric or compression sprayer, cold fogger, paintbrush, roller, or immersion. Expect 800-1,600 sq. ft. of surface coverage per gallon depending on surface type and application method.

[For use [on, in]: {select one or more of the surfaces and use sites from page 4}]

FOR CLEANING AND DEGREASING

- 1) Apply Concrobium on area until wet.
- 2) Wipe [or scrub][Wipe/scrub] clean [and dry]. [No rinsing required.]
- 3) [For tough stains, reapplication may be necessary.]

PREVENTATIVE TREATMENT

To inhibit mold and mildew growth on surfaces:

- 1) Apply Concrobium on area until evenly wet.
- 2) [To promote drying] [and to avoid residue marks], [use a clean cloth or paper towel to] Wipe [clean] [off excess wetness].
- 3) Allow treated surfaces to dry completely.

REMEDIAL TREATMENT

Concrobium must be used as part of a comprehensive mold remediation or water damage restoration program, including:

- Monitoring for conditions favorable to mold growth such as moisture ingress and high relative humidity
- Eliminating conditions favorable to mold growth
- Drying affected areas to below 20% moisture content.

[Concrobium must come in direct contact with mold to be effective.]

Recommended Mold and Mildew Remediation Websites

- IAQA – Indoor Air Quality Association (www.iaqa.org)
- EPA – Environmental Protection Agency (www.epa.gov)
- New York City “Guidelines on Assessment and Remediation of Fungi in Indoor Environments” (www.nyc.gov/html/doh/html/epi/moldrpt1.shtml)
- IICRC – Institute of Inspection, Cleaning and Restoration Certification (www.iicrc.org)
- Concrobium – www.concrobium.com
- Standard and Reference Guide for Professional Water Damage Restoration” (IICRC S500) published by the Institute of Inspection, Cleaning and Restoration Certification [(www.iicrc.org)]

Refer to the Personal Protection Equipment (PPE) Requirements for Applicators section for the appropriate PPE to wear. [This section along with additional directions for use are contained on [inside] [fold out] [other appropriate reference] portion of labeling.]

Small Areas – Total Surface Area Affected Less Than 30 Square Feet

Areas of growth less than 30 square feet (area of a single wall panel) can normally be remediated easily. Apply Concrobium to retard the [growth and] spread of fungal spores [and other contaminants] until the area can be thoroughly cleaned and remediated. If ceiling tiles or other easily removable items [of nominal value] are moldy, remove them, seal in a plastic bag and dispose with normal trash. If the surface is not easily replaceable:

- 1) Clean surface soil from contaminated area with Concrobium. [For best results, [and to avoid possible interference from other chemicals,] use Concrobium for initial cleaning.] [Use a cleaning tool (cloth, cleaning pad) suitable for the surface being cleaned.] Remove as much dirt and mold as possible. [In some cases, staining may be irreversible.] [[Do not expect] Concrobium [to] [will not] whiten stains [on contact].]
- 2) Refer to the Preventative Treatment section for application.
[The following steps may be inserted in place of step 2]
- 2) Apply Concrobium on area until evenly wet.
- 3) [To promote drying] [and to avoid residue marks], [use a clean cloth or paper towel to] wipe off excess wetness.
- 4) Allow treated surfaces to dry completely.]

[In some cases, staining may be irreversible.] [[Do not expect] Concrobium [to] [will not] whiten stains [on contact]] [If, [following treatment], additional steps are taken to [remove] [or] [cover] [address] [treat] the stain, reapply Concrobium as a final step [per Preventative Treatment section] to protect area from regrowth.]

Large Areas – Total Surface Area Affected Greater Than 30 Square Feet

Areas larger than 30 square feet require special procedures and individuals trained in remediation. Refer to the recommended websites for guidelines on remediation. Before using Concrobium to mitigate large areas, you should understand one or more of these guidelines. Follow these guidelines to apply Concrobium.

When water damage is suspected, first find the source of water and eliminate it. Next, remove excess water. See IICRCS500 (Recommended Websites) for guidance on water removal. If excess water is removed within 24 hours, spraying affected surfaces with Concrobium will inhibit growth.

Structural members and/or contents exposed to water in excess of 24 hours may have extensive microbial growth that is not visible. Prepare a complete assessment and remediation plan to incorporate Concrobium use, provide for user and occupant safety and to document and monitor the remediation process. Concrobium can be used on materials removed for disposal and in other applications where antimicrobial use is indicated. If you are not experienced in preparing and executing such a plan, contact Siamons International Customer Service at (866) 811-4148 for assistance.

REAPPLICATION

Reapply weekly or when growth or odor reappears. Determine and correct the cause of re-growth before reapplication. Reapply [Concrobium] if surfaces are washed or painted.

[Reapply weekly on hard surfaces and [monthly] [every 28 days] on fabrics, or whenever [new growth] [mildew] [mold] [regrowth] appears.]

PERSONAL PROTECTION EQUIPMENT REQUIREMENTS FOR APPLICATORS

For areas less than 30 sq. feet, an N-95 respirator, gloves and goggles/eye protection are recommended to avoid mold or mold spore exposure. For areas greater than 30 sq. feet, use an N-95 respirator or half-face respirator with HEPA filter, disposable overalls, gloves and goggles/eye protection.

{For sizes 1 gallon or less}

STORAGE AND DISPOSAL

Store in original container in areas inaccessible to small children. Keep securely closed. Do not reuse empty container. Rinse thoroughly. [Wrap and] Discard in trash.

{For sizes over 1 gallon}

STORAGE AND DISPOSAL:

Do not contaminate water, food or feed by storage or disposal. PESTICIDE STORAGE: Store in original container in areas inaccessible to small children. Keep securely closed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. For more information on the disposal of unused, unwanted product and the clean up of spills, contact the EPA Regional Office or the Manufacturer for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill; or incinerate, or, if allowed by state and local authorities, burn. If burned, stay out of smoke.

{for containers of 5 gallons or 50 lbs. or more}

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting agency 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.

Made in [Canada] [the U.S.A.]

Questions or Comments? Contact: Customer Service, Siamons International Inc.,
1.866.811.4148 or at www.concrobium.com.

TM Concrobium is a trademark of Siamons International Inc. Toronto, Canada

{Secondary container label for use if contents of 1 gallon (or larger) label are placed in smaller containers}

CONCROBIUM
(Filled by user)

[Secondary Container Label]

Follow directions for use, storage and disposal from the [1 gallon] [3.8L] [1 gallon 7 oz.] [4L] [5 gallon 1 quart 4 oz.] [20L] [55 gallon] [208.175L] [original] [CONCROBIUM] [container] label.

ACTIVE INGREDIENT

Sodium Carbonate.....0.95%

OTHER INGREDIENTS.....99.05%

TOTAL.....100.00%

KEEP OUT OF REACH OF CHILDREN

Sold by Siamons International Inc.
36 Meteor Drive, Toronto, ON M9W 1A4
Toronto, Canada