



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 3, 2008

David Swain
Scientific & Regulatory Consultants, Inc.
Agent for **Siemons International, Inc.**
P. O. Box 1014
Columbia City, IN 46725

Subject: **Concrobium**
EPA Registration Number: 82552-1
Application Dated: July 22, 2008
Receipt Date: July 23, 2008

Dear Ms. Collins:

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

Proposed Amendment

- Revised label

Labeling Comments

- Delete the word "Cure" from the label. The word "Cure" is too promising and implies something else other than organisms control/kill.

General Comment

A stamped copy of the label is enclosed for your record.

The Agency is moving away from review of paper submitted registration applications to electronic review of applications. Therefore, we need your help to make this an efficient and convenient process for both you and the Antimicrobials Division. Accordingly, we are asking you to submit future labeling amendments for this product via the electronic labeling process. Refer to the following website for guidance on electronic submissions, including label:

http://www.epa.gov/oppfead1/eds/esr_guidance.htm#overallsub. If you have any questions concerning electronic label submissions, a list of contacts is available at the following website: <http://www.epa.gov/oppfead1/eds/edsgoals.htm#contacts>.

Other Comments

Should you have further questions concerning this letter, please contact me by telephone at (703) 308-6422 or by e-mail at heyward.adam@epa.gov or Lisa McKelvin by telephone at (703) 308-7496 or by email at mckelvin.lisa@epa.gov during the hours of 8:00 am to 4:00 pm EST.

When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Lisa R. McKelvin

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

Enclosure: Stamped label

3/12

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 gallons (18.9L)
5 gallons 1 quart 4 oz. (20 L)
20 gallons (75.708 L)
55 gallons (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
SEP 3 2008**

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

4/12

{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 [or] [harmful chemicals]
- [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 [form] an invisible antimicrobial shield [barrier] that [eliminates] [existing] 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,] [harmful chemicals] [or] [other] [VOCs] [and is suitable for use on [both][non-porous][hard][and][porous][fabric] surfaces.]
- Concrobium not only eliminates [existing] mold but prevents it from coming back
- Use Concrobium [to [eliminate] [mold problems] [and prevent mold] [problems] [control mold] in [the following [vulnerable] areas] [basements,] [bathrooms,] [laundry rooms,] [attics,] [closets] [and] [around windows.] [- even boat interiors and RVs]
- For use on [the following] [both] [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
 - Attics
 - Garages
 - Crawl spaces
 - Around windows
 - Garden sheds
 - Front loading [washing machines][washers][enclosures]
- For use in homes, businesses or institutions.
- No fumes
- Not flammable
- Deodorizer
- [Also] available in 1 [gal] [Gallon] 5 [gal] [Gallon] 20 [gal] [Gallon] and 55 [gal] [Gallon] sizes [for larger areas]

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.

- Eliminates [kills] [musty] [foul] [stale] odors [from] [gym] [sports] [hockey] [football] [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] [basketball] [athletic] [equipment] [lockers]
- No mixing required.
- Ready to use
- Easy to use
- For [use] on [fabrics] [upholstery] [clothing] [curtains] [cushions] [animal bedding] [too]
- Works on [fabrics] [upholstery] [clothing] [curtains] [cushions] [animal bedding] [too]
- 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].
- The cure for [the common] mold
- Why buy [3] [2] [mold] [solutions] when 1 will do?
- 3 for 1
- 2 for 1
- The All-In-One cure for your mold problem
- [Physically encapsulates] [and] [crushes] mold [and] [mildew] [fungal] [spores]
- 3 in 1
- 2 in 1
- [Three] [All]-in-one [solution]
- [Powered] [by] [contains] [with] Concrobium [-powered] [built-in] [polymer] [polymeric] [antimicrobial] [technology] [inside]

IDEAL FOR [CAN [ALSO] 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
- *{May insert one or more of the surfaces and/or sites listed on page 5 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] [Control] 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]

6/12

- 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 [both][non-porous][hard][and][porous][fabric] 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
- *{May insert one or more of the surfaces and/or sites listed on page 5 of this label}*

7/12

[Surfaces:]

Bathroom Basins	Glazed Ceramic [tile]	Plastic Mattress Cover
Bathroom Surfaces	Glazed Porcelain [tile]	Plexiglass®
Bathroom Tile	Hard non-porous surfaces	Portable Toilet
[Fiberglass] Bathtub [Tub]	Hard Plastic surfaces	Recycle Bin
Bed Frames	Laminated Surfaces	Resilient Flooring
Bed Springs	Lamps	Shower [Stall] [Area]
Bidet	Linoleum	Shower [Curtain] [plastic] [liner]
Cabinets	Lockers	[Under] Sink [Basin]
Cat Litter Box	Louvers	Sealed granite
Chairs	Marble Cultured	Slate
Desks	Marble Synthetic	Sports Equipment
Diaper Pails	Marlite	Stainless Steel
Dorm	Mattresses	Toilet / Urinal exteriors
Enamel	Metal Blinds	[around] Toilet Areas
Fabric [surfaces]	Mirrors	Upholstery
Fixtures	No wax floors	Vinyl [tile]
Furniture	Parquet	[Washable] Walls
Garage Surface	Plastic Laundry [basket] hamper	Washing Machines
Garbage Can [Pail]	Plastic Laminate	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	Hotel / Motel	Public Factory
Airports	Industrial Building	[Public] [Restroom]
Attic	Institution	Public telephone booth
Automobile [car] interior	[Institutional] [Bathroom] [restroom]	Recreational Center [facility]
Bowling Alley	[Institutional] [Laundromat]	School [College]
Business [building]	Kenel	Shelter
Closet	Laboratory	Storage Area [Room]
Commercial Building	Manufacturing Plant	Tack Shops
Day Care Center	Military Installation	Toll Booth
Dressing rooms	Office [Building]	Train Interior
Factory	Pet areas	Utility Rooms
Gymnasium	Pet Shops	Waiting Room
Health Care Facility	Pharmacy	Warehouse Club
Health Club	Public Facility	

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] [and] [prevents] [is effective against] mold [and] [mildew] organisms [growth] on [both][hard][non-porous][and][fabric][porous] [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 [both][hard][non-porous][and][fabric][porous] 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)] {numbering of steps is optional} 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 PREVENT MOLD] [AND] [MILDEW]

To [inhibit] [prevent] mold and mildew growth on surfaces:

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

REMEDIAL TREATMENT [TO [REMEDiate] [ELIMINATE] MOLD

Concrobium must be used as part of a comprehensive mold remediation or water damage restoration program, including [this should also include]:

- Monitoring for conditions favorable to mold growth such as [moisture ingress] [water leaks] 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.]

9/12

When water damage is suspected, first eliminate the water source. Next, remove excess water and dry surfaces thoroughly. Concrobium can be used on materials removed for disposal. If excess water is removed within 24 hours [and surface is thoroughly dried], spraying affected surfaces with Concrobium will [inhibit] [prevent] growth. [Structural members and/or contents] [Building materials] 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.

Consult the following websites for remediation guidance.

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)
- 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 [mold] 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 [take the following steps]]:

[1)] {numbering of steps is optional} Remove heavy soil. [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] [and ensure surface is thoroughly dried.] [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)] [[If desired] [If dry time][If water staining] [is a] [potential] [concern] [To promote drying] [and to avoid residue marks], [use a] [clean cloth] [or] [paper towel] [to] wipe off excess wetness.][with a clean cloth or paper towel.]

[4)] [Allow treated surfaces to dry completely.]

[Remove heavy soil prior to application] [Mold stains may remain visible following treatment] [This is normal] [In this case] [If so] [If mold stains remain] [following treatment] [reapply] [product] [and] [wipe] [or] [scrub] [area] [away stains] [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 [and surface thoroughly dried] [and thoroughly dry surfaces]. See IICRCS500 (Recommended Websites) for guidance on water removal. If excess water is removed within 24 hours [and surface thoroughly dried], spraying affected surfaces with Concrobium will [inhibit] [prevent] growth.]

[[Structural members and/or contents] [Building materials] 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 Siemons 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 [and ensure the surface has been thoroughly dried] 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. Nonrefillable container. Do not reuse or refill this container. Rinse thoroughly. Offer for recycling if available or [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: Nonrefillable container. Do not reuse or refill this container. 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

12/12

{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] [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