

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 24, 2023

Rebecca Mannion
Consultant
Scientific & Regulatory Consultants, Inc.
Electronic Transmittal: rmannion@srcconsultants.com

Subject: Notification per PRN 98-10 – Update New Company Name, New Company

Address, and Add New Graphics Product Name: Concrobium

EPA Registration Number: 82552-1 Application Date: 11/15/2021 Action Case Number: 00336508

Dear Ms. Mannion:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "NOTIFICATION" and placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2 EPA Reg. No. 82552-1 Decision No. 00336508

If you have any questions, please contact Marcel Howard at (202)566-2795 or at howard.marcel@epa.gov.

Maral Contact Marcel Howard, Product Manager, Team 34

Regulatory Management Branch II Antimicrobials Division (7510M)

Office of Pesticide Programs

CONCROBIUM

KEEP OUT OF REACH OF CHILDREN

[See back panel for additional precautions] {For use only with "Bag On Valve" configuration}

Net Contents 13.5 oz. (400 ml)

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)

NOTIFICATION

82552-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/24/2023

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

Sold by Siamons International Inc.
36 Meteor Drive, Toronto, ON M9W 1A4
Toronto, CanadaRust-Oleum Corporation
11 E. Hawthorn Parkway
Vernon Hills, IL 60061

{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:]
 - o Basements
 - Bathrooms
 - Vacation homes
 - Boat interiors
 - Areas under construction
 - o Attics
 - o Garages
 - Crawl spaces
 - Around windows
 - Garden sheds
 - o 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]
- 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].
- Why buy [3] [2] [mold] [solutions] when 1 will do?
- 3 for 1
- 2 for 1
- [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]

- 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}

[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

Desks Marble Synthetic Stainless Steel

Tribe (Height Stainless Steel Stainless Steel Steel Stainless Steel Steel Stainless Steel S

Dorm Mattresses Toilet / Urinal exteriors
Enamel Metal Blinds [around] Toilet Areas

Fabric [surfaces]MirrorsUpholsteryFixturesNo wax floorsVinyl [tile]FurnitureParquet[Washable] WallsGarage SurfacePlastic Laundry [basket] hamperWashing 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]

BathroomFamily RoomMobile HomeStorage BuildingBedroomFarmhouseMud RoomSummer CottageBoat InteriorGarageNurserySunroom

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] Kennel Shelter

Closet Laboratory Storage Area [Room]

Commercial Building Manufacturing Plant Tack Shops Day Care Center Military Installation Toll Booth Office [Building] Dressing rooms Train Interior Factory Pet areas **Utility Rooms** Waiting Room Gymnasium Pet Shops 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.]

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 (<u>www.iaqa.org</u>)
- EPA Environmental Protection Agency (<u>www.epa.gov</u>)
- 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 Siamons International Rust-Oleum Corporation 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., Rust-Oleum Corporation

1.866.811.4148 or at www.concrobium.com.

TM Concrobium is a trademark of Siamons International Inc. Toronto, Canada Rust-Oleum Corporation

{For use only with "Bag On Valve" configuration}

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

PHYSICAL AND CHEMICAL HAZARDS

Contents under pressure. Keep away from heat, sparks and open flame.

Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

{Graphic options of approved use sites and claims}











{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, CanadaRust-Oleum Corporation
11 E. Hawthorn Parkway
Vernon Hills, IL 60061