

82972-1

08/28/2007

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

August 28, 2007

Olivia Laird
Laird's Regulatory Consultants, Inc.
Estates at Shenstone Farm
17804 Braemar Place
Leesburg, VA 20175

Subject: Vital Technologies
Vital Oxide
EPA Registration No. 82972-1
Submissions Dated: April 20, 2007
Receipt Date: May 1, 2007

Dear Ms. Laird:

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, to add *Staphylococcus aureus* - MRSA and Norovirus, is accepted with comments.

1. In accordance with DIS/TSS-15, label directions regarding use of antimicrobial pesticides on hard surfaces must identify the major areas in which the product is recommended for use (e.g., homes, schools and etc.). Please revise the label to include this information.
2. This product is for use on **hard non-porous surfaces**. This use site is not optional. Therefore, you must insert **non-porous** everywhere hard surfaces appears on the label.
3. Feline Calicivirus was the tested surrogate to support claims for Norovirus. Therefore, the claim should be written as Norovirus (Feline Calicivirus as surrogate).
4. Make the following changes to the label:
 - Under the "To Deodorize" section of the label, change "fogger manufacturers directions" to read "fogger manufacturer's directions."

- Under the "A Few Suggested Uses" section, change "For disinfecting hard surfaces" to read "For disinfecting pre-cleaned, hard, non-porous surfaces."
- Under the "Disinfect Hard Non-Porous Surfaces" section, change "full strength to surface" to read "full strength to pre-cleaned surfaces."
- Under the "Active Ingredients" section of the label, change "dimethylenzyl" to read "dimethylbenzyl."

General Comments

A stamped copy of the labeling is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

The data evaluation reviews are enclosed for your files. Should you have any questions or comments concerning this letter, please call Wanda Henson at (703) 308-6345.

Sincerely,

Emily H. Mitchell
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

(Enclosure)

**Disinfects As It Cleans
Eliminates Odors • Fragrance Free**

VITAL-OXIDE provides broad-spectrum disinfectant efficacy, mold & mildew prevention, and odor elimination.

A FEW SUGGESTED USES: For disinfecting hard surfaces such as glass, laminate, chrome, stainless steel, polyurethane coated hardwood floors, glazed ceramic tile, sealed concrete & linoleum floors. Use as a mold & mildewstat on hard surfaces such as tile, and porous surfaces such as fabric.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Shake well before using. Test fabric for color fastness. Contains a dilute oxidizing agent. Do not mix with vinegar or acetic cleaners.

Pre-cleaning Instructions: Remove gross filth and heavy soil by cleaning. Spray product straight onto soils, scrub and wipe clean with a dry paper towel or cloth. For cleaning floors add one cup **VITAL-OXIDE** per gallon of water in bucket and clean with sponge, mop or pad.

To Disinfect Hard Non-porous Surfaces: Apply **VITAL-OXIDE** full strength to surface, wetting thoroughly with spray, sponge, mop, or by immersion in solution. Allow surfaces to remain wet for 10 minutes. For immersion replace solution daily, or more frequently if it becomes significantly soiled or diluted.

To Prevent Mold or Mildew on Floors, Walls, Ceilings & Fabric: Remove as much surface dirt, mold, or mildew as possible by cleaning. Then spray on **VITAL-OXIDE** from a distance of 12 inches until visibly wet and let air dry.

To Deodorize: **VITAL-OXIDE** works by oxidation, not by masking of odors. Eliminates odors caused by fire smoke, tobacco smoke, musty odors, stale-cooking odors. Simply spray, fog or wipe on full strength and let air dry to provide long lasting residual deodorizing action. When fogging apply 1 quart per 2000 cubic ft. following fogger manufacturers directions for use. **VITAL-OXIDE** must come into contact with the cause of the odor to be effective. For pet urine stains in carpet, blot urine as dry as possible then saturate stain with **VITAL-OXIDE** through carpet pad.

VITAL-OXIDE®

BROAD SPECTRUM DISINFECTANT MOLD & MILDEW REMOVER

PREVENTS MOLD & MILDEW ON HARD SURFACES & FABRIC

HEAVY DUTY ODOR ELIMINATOR KILLS 99.9% OF BACTERIA

VITAL-OXIDE KILLS:

Norovirus, MRSA, Escherichia coli, Salmonella enterica, Staphylococcus aureus, Legionella pneumophila, Aspergillus niger.

ACTIVE INGREDIENTS:

Chlorine Dioxide.....	0.200%
Alkyl (60% C ₁₄ , 30% C ₁₈ , 5% C ₁₂ , 5% C ₁₆)	
dimethyl benzyl ammonium chloride.....	0.125%
Alkyl (68% C ₁₂ , 32% C ₁₄)	
dimethyl ethylbenzyl ammonium chloride.....	0.125%
OTHER INGREDIENTS.....	99.550%
Total.....	100.000%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

NET CONTENTS: 128 oz.

STORAGE AND DISPOSAL: Store in original closed container in a cool, dry place away from heat and open flame. **DISPOSAL:** Rinse and offer empty container for recycling. If recycling is not available discard container in trash. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Discard excess or used **VITAL-OXIDE** solution in drain with running water.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS & DOMESTIC ANIMALS

Causes moderate eye irritation. Avoid contact with eyes.

FIRST AID:

If in Eyes	Hold eye open and rinse slowly with water 15-20 mins. Remove contact lenses after first 5 mins. and continue rinsing. Call a Poison Control Center or doctor for treatment advice. Have product container or label with you when calling a poison control center or doctor, or going for treatment.
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NOTICE: Seller expressly warrants that the product conforms to its chemical description. There are no warranties associated with sale of the product either express or implied including but not limited to the warranties of fitness for a particular purpose or use.

Manufactured by:
Vital Technologies, Inc
PO Box 2026
Hobe Sound, FL 33475
Customer Service: 1-800-303-5405
www.vitaltechnologies.com

EPA Reg. No. 82972-1
EPA Establishment No. 70261-AL-1

ACCEPTED
with COMMENTS
EPA Letter Dated:

AUG 28 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 82972-1

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