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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

SEP 10 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Olav Messerschmidt
Registration Agent
Urth Tech, LLC
c/o OMC Ag Consulting
30777 Northwestern Hwy, Suite 300
Farmington Hills, MI 48334

Subject: **Detox**
EPA Registration No. 84368-1
Application Dated: February 10, 2009
Receipt Date: February 17, 2009

Dear Mr. Messerschmidt:

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

Proposed Amendment

- Add bacterial claims
- Request to change primary name to "URTH™ PRO"

Your request to change the primary name "Detox" to URTH™ PRO is acceptable.

Labeling Comments

1. Efficacy data must be submitted to support mold remediation claims on porous surfaces. Until the data is submitted and deemed acceptable by the Agency, the mold remediation language must be restricted to hard non-porous surfaces.
2. On page 4 sixth bullet delete the word "gently". Safety claims of the pesticide, or its ingredients, including statements such as "trusted," "safe," "nonpoisonous," "noninjurious," "harmless" or "nontoxic to humans and pets" with or without such a qualifying phrase as "when used as directed," are considered to be false and misleading. Refer to Chapter 12 of Label Review Manual.
3. Under Use Surfaces change Porcelain to "glazed porcelain", granite to "sealed granite" and cement to "sealed cement."
4. Under Use Surfaces specify what type of plastic.
5. On page 7 under Directions for Use, delete "within 5 minutes" and replace with "in 5 minutes."
6. Delete page 6 and renumber. It's a duplicate of page 13.

- 7. Revise the Storage and Disposal language to be in compliance with PR 2007-4.
- 8. You must revise your Warranty Statement. Overly broad language implying buyer has no legal right to recover damages from manufacturer (e.g., "all such risks shall be assumed by the buyer"). Refer to the enclosed EPA Guidance on Warranty Statements.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act 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) list 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. 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 Assurance.

As an alternative, you may refer consumers to the company's phone number or email address.

Note: The Agency is working on a mold policy. Once the policy is finalized and issued you may be required to submit a fungicidal study to support the mold and mildew claim on this label.

Other Comments

Future labeling amendments may be accomplished by submitting a copy of the electronic label. Refer to the following website for guidance on electronic submissions, including label: <http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm>.

If you have any questions concerning electronic label submissions, please refer to the above website for a list of contact personnel for more information.

Submit three (3) copies of the final printed label bearing the above revisions. A stamped copy of the accepted labeling is enclosed.

Should you have any questions concerning this letter, please contact me by telephone at (703) 308-6427 or email address at: carlisle.sharon@epa.gov or Renae Whitaker telephone at (703) 308-7003 or email address at: whitaker.renae@epa.gov during the hours of 8:00 am to 3:30 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,



ShaRon Carlisle
 (Acting) Product Manager (34)
 Regulatory Management Branch II
 Antimicrobials Division (7510P)

Enclosures: (EPA stamped approved label)
 DERs D348870 and D362587

Master Label:

UrthPRO™ Cleaner and Disinfectant

Kills Mold, Fungi and Bacteria

ACTIVE INGREDIENT


Ethyl alcohol.....	29.4%
OTHER INGREDIENTS.....	70.6%
TOTAL.....	100.0%

KEEP OUT OF REACH OF CHILDREN WARNING

See side/back panel for First Aid

Directions for Use must be read completely prior to using this product.

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted con detalle. (If you do not understand the label, find someone to explain it to you in detail.)

 ***For Organic Production]***
[Organic certifier or listing logo]

Net Contents: [24 oz., 1 quart, 1 gallon, 5 gallon, or 55 gallon]

EPA Reg. No. 84368 – 1

EPA Est. No. XXXX - YY

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<p><i>{Optional marketing claims, may be used on any panel}</i></p> <p>GENERAL CLAIMS:</p>	
<ul style="list-style-type: none"> • Controls fungi, including <u>Trichophyton mentagrophytes</u>, and bacteria including <u>Salmonella enterica</u>, <u>Staphylococcus aureus</u> and <u>Pseudomonas aeruginosa</u> on hard, non-porous surfaces • Contains no ammonia, bleach, acid or synthetic ingredients • Kills fungi and bacteria • Eliminates musty odors • Colorless • Mold Control • Mildew stain remover • Bacterial disinfectant • General disinfectant • URTH's patented technology kills [destroys] mold and fungi, including <u>Trichophyton mentagrophytes</u>, and bacteria, including <u>Salmonella enterica</u>, <u>Staphylococcus aureus</u> and <u>Pseudomonas aeruginosa</u> within 5 minutes. • Works in hard to clean places (tile grout, caulking and corners) without scrubbing. • Kills fungi and bacteria in hard to clean places including: <ul style="list-style-type: none"> ○ Basements ○ Bathrooms ○ Vacation homes ○ Boat interiors ○ Areas under construction • For use in homes, businesses, institutions, hospitals • Contains no bleach, ammonia, acid, or synthetic ingredients • Colorless • No fumes • Fungicide • Effective against [fungi] and [bacteria] • Controls odor causing mold and fungi • Deodorizer • URTH is [specially formulated] for effective [control] [elimination] of [most] offensive [stains] [odors] caused by mold, mildew and bacteria. 	<ul style="list-style-type: none"> • Use all around the [kitchen] [home] [house] • [lightly] cleans [and] disinfects] • Great for [daycare] [restroom] [restaurant] [office] [school] use! • Great for [all around] [everywhere in] [the] [house] [home] [kitchen] [bathroom] • Just spray [and] [wipe] [walk away] • Latest in [antimicrobial] [disinfectant] technology • Leaves a streak-free shine • Leaves no residue • Leaves surfaces [shiny] [clean] • Leaves your [kitchen] [home] [house] [bathroom] [smelling] clean • Makes your job easier • No [harsh fumes] [accidental whitening] • No measuring • No mixing • Non-abrasive [formula] • Cleaning and disinfecting • Cleaner and disinfectant • Patent pending [formula] • Perfect size for [bathrooms] [kitchens] [your purse] [your pocket] [use all around the house] • Pocket-sized • Globetrotter • On the spot disinfectant • Proper dilution every time • Quick – or – easy – or – fast – or – convenient – or – versatile • Ready-to-use – or – RTU • Use on any washable surface including (list any surface from list 2 or 3) • Use for a [fresh] [home] [house] • Eliminates potential for mixing errors

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<ul style="list-style-type: none"> • Controls mold [leaving a fresh clean scent] [leaving rooms clean and fresh smelling]. • Eliminates musty odors [caused by mold]. • URTH disinfects within 5 minutes • A way to [clean] [and] [disinfect] • A [smarter] way to clean • A new technology that is enough to use around your family...on the surfaces they touch most • All purpose [antibacterial] kitchen [cleaner] [mist] [spray] [disinfectant] • Antibacterial [daily] kitchen [cleaner] [mist] [disinfectant] [spray] • Disinfectant that can be used anywhere • Check [out] our website at www.cleanurth.com [for more information] • [Clean] [light] [airy] [fresh] fragrance – or – scent • [Clear] [colorless] formula • [Urth™] everywhere • Color fast • [Color fast] will not whiten or bleach [surfaces] [or] [clothes] • Contains no [abrasives] [or] [bleach] [or] [ammonia] [or] [[harsh] acids] • Contains no [artificial – or - synthetic] [fragrances] [or] [dyes] [or] [ingredients] [or] [chemicals] • [Controls] [prevents] [stops] the growth of odor-causing [bacteria] [and] [mold] [and] [fungi]. • [Daily] [everyday] kitchen [cleaner] [mist] [disinfectant] [spray] • Deodorizer • Deodorizes sponges • [Easy] [quick] [convenient] to use • [Easy] [quick] [convenient] way to disinfect • [Economy] [institutional] [refill] [value] size – or – pack • [Economy] [value] refill • Eliminates buckets and rags for [cleaning] [and] [disinfecting] • Eliminates labor required to mix solution 	<ul style="list-style-type: none"> • Eliminates the need to test ppm level • Food [contact] [surface] [service] disinfectant • For [daily] [everyday] [light-duty] [kitchen] [bathroom] [hospital] disinfection –or– cleaning • For [daily] [everyday] use • For a cleaner, fresher [bathroom] [kitchen] [home] [house] • For use on both white and colored surface and on any washable surface including (list any surface(s) from list 2 or 3) • [Worry free] spray [that you can use all around the house] • All-in-one [cleaner] [and] [disinfectant] [and] [fungicide] • Scented only with 100% [whole essential oils] [and] [botanical extracts] • Use [daily] [everyday] • Use for wiping [bathroom] [kitchen] counters • Works quickly • [Free of] [No] bleach -or- ammonia -or- acid -or- [synthetic ingredients -or- artificial ingredients] -or- harmful chemicals • Degreaser [Degreases]
<p>DISINFECTANT/FUNGICIDE CLAIMS</p>	

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<ul style="list-style-type: none"> • Antibacterial • Can help reduce the risk of cross-contamination • Can reduce the spread of illness-causing [kitchen] bacteria [on [hard non porous] • Eliminates food odors like garlic and onion left behind on kitchen surfaces after cooking • Eliminates odors caused by [bacteria] [and] [mold] [and] [fungi] • [Kills] [Gently] [lightly] cleans and [Kills] [eliminates] [destroys] [removes] [the most common] [kitchen] [bacteria] [and] [fungi] • Kills [fungi] [bacteria] in 5 minutes • Kills household [bacteria] [and] [fungi] • Kills the [bacteria] [fungi] commonly found in kitchens and bathrooms • Kills [the] bacteria you can't see • [Kills] [eliminates] [destroys] [removes] [all] [bacteria] [and/or] [fungi] [all] around your [bathroom] [kitchen] [home] [house] • [Kills] [eliminates] [destroys] [removes] [bacteria] [and/or] [fungi] all around your [kitchen] [bathroom] [including] [like] Salmonella [enterica] [and] Staph [Staphylococcus aureus] [and] Pseudomonas [aeruginosa] [and] Athletes foot fungus [Trichophyton mentagrophytes] • [Kills] [eliminates] [destroys] [removes] [bacteria] [and/or] mold [and/or] mildew [and/or] fungi] without leaving a harmful residue • [Kills] [eliminates] [destroys] [removes] [bacteria] [and/or] fungi] on commonly touched surfaces that can be transfer points for bacteria [such as doorknobs, telephones, keyboards, and lightswitches] 	<ul style="list-style-type: none"> • [Kills] [eliminates] [destroys] [removes] [bacteria] [and/or] fungi] on: (list any surface from list 2 or 3) • [Kills] [eliminates] [destroys] [removes] [bacteria] [and/or] fungi] [on hard, nonporous surfaces] • [Kills] [eliminates] [destroys] [removes] common household [bacteria] [and/or] fungi] • Kills odor causing [bacteria] [and/or] mold [and/or] mildew [and/or] fungi] • Leaves household surfaces [sanitary] [disinfected] [free from germs] • Reduces [allergens] [dust mite matter] [pet dander] [caused by] [bacteria] [and/or] mold [and/or] mildew [and/or] fungi] • Disinfects • Specially designed for use on: (list any surface from list 3) • Tough on [bacteria] [and/or] mold [and/or] mildew [and/or] fungi], [Urth™] [the solution] is easy to both hands and surfaces • [Cleaner] [and] [Disinfectant] [and] [Fungicide] • Cleans as it [disinfects] [kills harmful germs] [kills common household bacteria] • A[n] [quick] [and] easy way to [kill] [eliminate] [destroy] [remove] bacteria [and] [fungi]
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USE SITES (LIST 3)			
<ul style="list-style-type: none"> • Around toilet areas • [Around] toilets • Automobiles • [Bath]tubs • Bathroom • [Counter]tops • Bathroom • [Surfaces] • Beverage Bars • Blinds • Boat Interiors • Booster Chairs • Cabinet Handles • Cabinets • Cafeteria[s] • Can Openers • Cars • Children's [Kids'] • [Wading] Pool • Children's [Kids'] • Table • [Computer] • Keyboards • Counter(s) -or- • Countertop(s) • Cupboards • Dairy Cases 	<ul style="list-style-type: none"> • Dining Room • Tables • Dish Racks • Dishwashers • Door Handles • Doorknobs • Doors • Drainboards • Dryers • [Empty] Clothes • Hampers • [Empty] Garbage • Cans [Bins] • Faucets • Floors • Freezers • Grills • Grocery Carts • [Grocery] • Checkout Areas • Handrails • High Chair Trays • High Chairs • Inside • Dishwasher[s] • [Interiors] • Kid's [Children's] • Playroom [Toys] 	<ul style="list-style-type: none"> • [Kitchen] • [Bathroom] Sinks • [Kitchen] [dining • room] Tables • Kitchen Surface • Kitchen Tools • Knives • Laundry Rooms • Light Switches • Litter Boxes • Outdoor[s] [Areas] • Oven Doors • Ovens • Pet Bowls [Areas] • Piano Keys • Plastic Patio • Furniture • Playpens • Potty-Chair[s] • [Seats] • Range Hoods • Recycling Bins • Restrooms • Shower [Faucets] • [Doors] [Handles] • [Fixtures] [Walls] • [Floors] 	<ul style="list-style-type: none"> • Silverware • Sink [Faucets] • [Fixtures] • [Handles] • Soap Dispensers • Storage Areas • Stovetops • Stroller [Handles] • [Trays] • Tables • Telephones • Toasters • Toilet [[Flushing] • Handles] [Seats] • [Surfaces] • [Exteriors] • Towel [Tissue] • Dispensers • Under Sinks • Urinals • Vanities • Vanity Tables • [Vinyl] Shower • Curtains • Walls • Washing Machines • Windowsills
USE SURFACES (LIST 4)			
<ul style="list-style-type: none"> • Basements and • crawl spaces • Cabinets and • counter tops • Cement (Sealed) • Ceramic Tile 	<ul style="list-style-type: none"> • Hardwood [floors] • Chrome • Corian • Floor surfaces • Formica • Glass 	<ul style="list-style-type: none"> • Granite sealed • Linoleum • Marble • Metal • Painted wallboard • Plastic 	<ul style="list-style-type: none"> • Porcelain glazed • Stainless Steel • Tile • Vinyl • Wood • Stone

{Optional text}

UrthPRO is an effective disinfectant against *Salmonella enterica* (ATCC #10708), *Staphylococcus aureus* (ATCC #6538) and *Pseudomonas aeruginosa* ATCC #15442) on hard, non-porous surfaces in the presence of 5% organic soil for a 5-minute contact time.

UrthPRO is effective against fungi, including *Trichophyton mentagrophytes* (ATCC #9533).

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear such as goggles or safety glasses. Wash thoroughly with water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

FIRST AID	
If in Eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lens, if present, after the first 5 minutes. Then continue rinsing eye.• Call a poison control center or doctor for treatment advice
Hot Line Number: Have the product container or label with you when calling a poison control center or doctor or going for treatment. For emergency information on UrthPRO, call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	

Physical or Chemical Hazards

Combustible. Do not use or store near heat or open flame.

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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.

The person applying this product is responsible for following these directions under both state and federal laws.

1.0 General

UrthPRO liquid formula kills and eliminates bacteria, including *Salmonella enterica*, *Staphylococcus aureus* and *Pseudomonas aeruginosa*, mold and fungi, including *Trichophyton mentagrophytes*, within 5 minutes. URTHPRO destroys odor, stain causing or other damage causing organisms including mold and mildew on floors, walls, contents and other interior building surfaces until such time as the cause of such growth can be identified and corrected. It is also used as [one component] [part of an all-in-one] [part of a one-step] mold remediation or water damage restoration program. The purpose of such a program is to minimize damage from growth of mold and other odor, stain and damaging organisms, and help building interiors continue in that condition. This product should only be used in those cases where visible microbial growth has been detected and then only as part of a program that removes that growth and identifies and corrects the conditions that led to that growth. If you need help understanding these instructions or have additional questions after reading these instructions, DO NOT APPLY THIS PRODUCT until you received answers for all of your questions.

2.0 Causes of Microbial Growth

Microbial (including bacteria, mold, mildew, and other fungi) growth is present at all times both outdoors and in building interiors. Normally the natural balance of the environment limits such growth to acceptable levels. Under certain conditions, growth can reach problem levels and if not controlled, will cause foul odors, stain and damage furnishings and valuables, and may even destroy structural components of the building. Normally fungal spores, live organisms and food sources are plentiful in building interiors. Elevated water from the following can lead to growth:

2.1 Floods

If water floods the interior of a building it brings a massive load of organic matter, bacteria and fungal spores. If the water and excessive organic load is not cleaned quickly, substantial growth will result. Floods can result from rising water and plumbing failures.

2.2 Leaks

Leaks release lesser amounts of water, often over extended time periods. Thus, they can lead to high levels of growth in wall cavities and other spaces where they are not visible until considerable damage has been done. Leaks can be both from plumbing, roof, wall or other structural failures.

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2.3 Humidity

Microorganisms grow in moisture that form on surfaces and within porous materials. This is known as water activity of the material or surface. High levels of humidity can lead to sufficient surface water activity to support accelerated growth if that elevated level is maintained for as little as 24 hours. Accelerated growth takes place with some fungi within 24 hours at humidity levels between 66% - 70%.

3.0 Indications for Use and Guidelines

Homeowners and building managers should survey their buildings at least monthly for any of the following conditions. When they are found, they should be corrected according to the guidelines.

3.1 Visible Growth

Areas of visible growth of less than 32 square feet (the area of a single wall panel) can normally be remediated without elaborate procedures. When these areas are identified, mist (see application instruction below) lightly with UrthPRO to completely kill and eliminate bacteria, mold and fungi until the area can be thoroughly cleaned and remediated. If growth is on ceiling tiles or other such easily removable items of nominal value, remove them and seal them in a plastic bag and dispose with normal trash. If the surface is not easily replaceable:

- Clean contaminated area to remove surface soil. For best results, and to avoid possible interference from other chemicals, use UrthPRO for initial cleaning. Use a cloth, cleaning pad or brush suitable to the durability of the surface being cleaned. Remove as much dirt and visible mold as possible.
- Apply UrthPRO on cleaned area until evenly wet and let it stand for 5 minutes.
- Allow treated surfaces to dry completely.
- Wipe with wet sponge or cloth if cosmetically necessary.

Areas larger than 32 square feet require special procedures and individuals trained in remediation. Guidelines for remediation of large areas of contamination have been established by the Indoor Air Quality Association (www.iaqa.org) and the US Environmental Protection Agency (www.epa.gov). Many in the field also refer to the New York City Department of Health "Guidelines on Assessment and Remediation of Fungi in Indoor Environments." Before using UrthPRO in mitigation of large projects, you should be knowledgeable of one or more of these guidelines and follow them when using this product.

3.2 Water Damage

Evidence of possible water damage includes water stains on ceilings and walls, persistent wet spots or actual flowing water whether from plumbing failure or outside sources. When water damage is suspected, the first priority is to find the source of water and cut it off. Once that has been accomplished, excess water should be removed. Detailed guidance on proper removal on excess levels of water is contained in "Standard and Reference Guide for Professional Water Damage Restoration" (IICRC S500) published by the Institute of Inspection, Cleaning and Restoration Certification (www.iicrc.org). If excess water has been removed completely in 24 hours or less, spraying surfaces that are

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wet with UrthPRO will kill any potential bacteria, fungi or mold that might have grown on the surfaces and no other steps should be necessary.

Where structural members and/or contents have been exposed to water in excess of 24 hours, there is a possibility of extensive microbial growth that may be visible or hidden. In that case a complete assessment and remediation plan must be prepared that properly incorporates the use of UrthPRO, provides for the user and occupant safety documentation and monitoring of the remediation process. If you are not experienced in preparing and executing such a plan, IICRC S500 contains excellent guidance. In the context of such a plan, UrthPRO can be used on materials to be removed and disposed of and in other applications where an Antimicrobial use is indicated.

4.0 General Directions for Using UrthPRO

UrthPRO's patented technology completely destroys [kills] [and] [eliminates] household and residential bacteria, including *Salmonella enterica*, *Staphylococcus aureus* and *Pseudomonas aeruginosa*, mold and fungi, including *Trichophyton mentagrophytes*, within 5 minutes. UrthPRO also effectively eliminates stain and odor causing bacteria, mold and fungi, or damage causing organisms on floors, walls, and other surfaces in residential, commercial, institutional, and industrial buildings within 5 minutes. UrthPRO also eliminates odors associated with bacteria, mold, mildew, smoke, animals, cooking, spoilage, musty and other odors and removes odor-causing organisms when used as part of a comprehensive preventative maintenance approach.

UrthPRO is a bactericide and fungicide, which [destroys] [kills] [eliminates] disease causing household and residential bacteria, mold and fungi, and is a deodorizer for use in residential, commercial and industrial settings. It will not stain or bleach materials or fabrics and will not harm or damage most interior surfaces. Test on an inconspicuous area if you are unsure of the surface on which you are working.

UrthPRO is formulated for use on all kinds of surfaces including:

- Painted wallboard
- Structural members and supports
- Ceilings and above ceiling spaces
- Basements and crawl spaces
- Cabinets and countertops
- Case goods and other furnishings
- Floor surfaces

Follow the directions for the specific type of component being treated. The following directions must be carefully read and understood prior to using the product.

4.1 Mixing Instructions

4.1 UrthPRO is a ready to use product – DO NOT DILUTE. Read the label before using.

4.2 Application Equipment and Devices

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Apply UrthPRO on the surface until thoroughly wet, let it stand for 5 minutes and wipe with wet sponge or cloth if is cosmetically necessary. UrthPRO must come in direct contact with bacteria, mold, fungi or other micro-organisms to be effective.

Refer to the precautionary statements and other special instructions that must be followed.

4.2.1 Brush, Mop or Wipe Application

Brush, Mop or Wipe Application may be specified by some facility maintenance or remediation plans. These techniques are generally more labor intensive than other methods and are normally used only when specifications require. These methods are suitable only for smooth uniform surfaces. Do not use on porous or non-uniform surfaces. When using brush or mop application, tools and materials used should be reserved only for application of UrthPRO, kept clean and protected between uses and replaced when worn or visibly soiled. Natural fiber brushes are preferred although any quality brush is acceptable. Where other types of cloths are used, they must be soft enough that they absorb a sufficient quantity of liquid to provide uniform application.

During Brush, Mop or Wipe Application, the applicator must have access to the surfaces being treated. Apply to a limited area at a time. Overlap applications to assure complete coverage. Cover completely while avoiding runs or pooling.

4.2.2 Spray Applications

Spray application is preferred on large surfaces that are easily accessible and uniformly shaped. The spray equipment chosen should provide a consistent fine (1 – 300 micron) particle size and uniform spray pattern. Powered medium pressure sprayers are preferred. However, airless sprayers are suitable.

Pump-up garden type sprayers can be used, but care must be taken to maintain maximum pressure by pumping frequently and the spray nozzle must be adjusted for the finest spray pattern possible. During applications achieve complete uniform coverage. Avoid excessive wetting and do not allow the spray to run or pool.

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4.2.3 ULV (Ultra Low Volume) or Mist Generating Sprayers

ULV, mist or other small particle application is preferable where surfaces are irregular or less accessible. Equipment capable of generating particles in the 15 – 60 micron range is most satisfactory. Do not use thermal type fog generators.

Generally a fog will carry and provide adequate coverage up to 8 feet from the point of application so the fog must be directed in all directions to assure coverage without over wetting. Fogging is only to be used as an adjunct to surface disinfection. Personal protective equipment including HEPA filtered mask, hooded coveralls and rubber gloves must be used when applying in open space with mist generating application equipment.

4.3 Application Techniques

UrthPRO must be applied evenly over surfaces that are being treated. Even and uniform application is essential for satisfactory results. The procedures, equipment and techniques described below have been tested and provide desired results.

4.4 Rate of Application

Users of this product must carefully follow the rate of application instructions provided below.

4.4.1 Hard, Smooth surface (Glass, Metal)

Apply until surface is evenly wet. Mist, wipe or spray coverage rate is 400 ft² per gallon. If this rate results in surface runoff or liquid pooling, lower the application rate until the surface is thoroughly and evenly wet without runoff or pooling.

4.4.2 Semi-Porous Surfaces such as Concrete or Plaster or Wallboard

Apply until surface is evenly wet. Mist coverage rate is 200 ft² per gallon. Wipe is not recommended. Spray coverage rate is 100 ft² per gallon. UrthPRO must penetrate into surface crevices and irregularities or it will not be effective. Inspect and assure that penetration is satisfactory. It may be helpful to make multiple applications at a lower application rate on some surfaces as the first application will wet the surface and facilitate penetration of following applications.

4.5 Frequency of Application

UrthPRO is suitable for frequent reapplication, but a single application will provide effective control. If there is evidence of re-growth, investigate to determine the cause of re-growth and correct that problem prior to re-application. Also make sure the re-occurrence of microbial growth does not have another cause such as persistently high humidity, standing water or hidden leaks.

Removed components that are contaminated with mold and other microbial growth may spread contamination while being removed from the building. To prevent this, smaller items should be placed in plastic bags that should then be sealed before being removed.

ACCEPTED
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Larger items that cannot be safely packaged should be treated before being moved through occupied spaces.

STORAGE and DISPOSAL

Storage: Store in a cool, dry place inaccessible to children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

NOTICE ON CONDITIONS OF SALE

The **Directions For Use** of this product reflects the opinion of experts based on experimental use and tests. The directions are believed to be reliable and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product.

Ineffectiveness or other unintended consequences may result, because of factors such as the presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of UrthTech or the Seller. All such risks are assumed by the Buyer.

To the extent consistent with applicable law, UrthTech warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use**, subject to the inherent risks, referred to above. To the extent consistent with applicable law, UrthTech makes no other express or implied warranty of fitness or merchantability or any other express or implied warranty. To the extent consistent with applicable law, in no case shall UrthTech or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, UrthTech and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of UrthTech.

UrthPRO™ is a trademark of UrthTech, LLC

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear such as goggles or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

FIRST AID	
If in Eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lens, if present, after the first 5 minutes. Then continue rinsing eye.• Call a poison control center or doctor for treatment advice
Hot Line Number: Have the product container or label with you when calling a poison control center or doctor or going for treatment. For emergency information on UrthPRO, call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	

Physical or Chemical Hazards

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

GENERAL CLEANING: [For everyday cleaning] spray UrthPRO™ directly on to surface and wipe clean. Repeat this procedure for heavily soiled areas.
DISINFECTION [OF FOOD CONTACT AND NON-FOOD CONTACT SURFACES] on HARD NON-POROUS SURFACES: [To kill bacteria, mold and fungi on hard, non-porous surfaces - or - To disinfect hard, non-porous surfaces . Clean area [with this product] to remove surface soil. Spray surface [with this product] [until thoroughly wet] and let stand for 5 minutes. [If desired], wipe with paper towel or clean towel. [Air dry] Organisms (List 1): Staphylococcus [<u>Staphylococcus aureus</u>] Salmonella [<u>Salmonella enterica</u>] Pseudomonas [<u>Pseudomonas aeruginosa</u>] Organisms (List 2): <u>Trichophyton mentagrophytes</u>
SPONGES: To [prevent] [stop] [control] the growth of odor-causing bacteria in [your] sponge[s], spray sponge [with this product] until saturated and let stand 5 minutes.

STORAGE AND DISPOSAL: Store in a cool dry place out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Only refill this container with UrthPRO™. Rinse thoroughly before discarding in a recycling container or trash.
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