

84368-1

08/30/2010

1/17

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

AUG 30 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Olav Messerschmidt
Urth Tech, LLC
30777 Northwestern Hwy., Suite 300
Farmington Hills, MI 48334

Subject: Detox™
EPA Registration Number: 84368-1
Application Date: July 23, 2010
EPA Receipt Date: August 2, 2010

Dear Mr. Messerschmidt:

This letter acknowledges receipt of your notification, submitted under the provisions of FIFRA section 3 (c) 9 and PR Notice 98-10.

Proposed Notification

- Add the modifiers "sealed" before "marble" and "stone" in the subject label.
- Delete the word "including" immediately before the listing of the bacteria and fungi for

General Comments:

Based on a review of submitted materials, your notification to update your label pursuant to PR Notice 98-10 is acceptable and has been placed in your file for future reference.

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Killian Swift of my staff by telephone at (703) 308-6346 or by email address at: swift.killian@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely yours,


Jacqueline Campbell-McFarlane
Jacqueline Campbell-McFarlane
Product Manager (34)

CONCURRENCES

Regulatory Management Branch II
Antimicrobials Division (7510P)

SYMBOL							
SURNAME							
DATE							

2/17

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
---	---	--	-----------------------

Application for Pesticide - Section I

1. Company/Product Number UrthTech, LLC/ 84368-1	2. EPA Product Manager ShaRon Carlisle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) UrthTech, LLC/ DETOX	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) UrthTech, LLC 30777 Northwestern Hwy, Suite 300 Farmington Hills, MI 48334 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

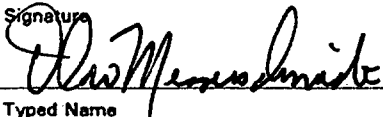
Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Add the modifier "sealed" before "marble" and "stone", i.e. sealed marble and sealed stone. Delete the word "including" immediately before the listing of the bacteria and fungi for which the subject product is labeled.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 24 oz, 1 Qt, 1, 5 and 55 Gallons		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Olav Messerschmidt	Title Registration Agent	Telephone No. (Include Area Code) 517-881-0100
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Agent	
4. Typed Name Olav Messerschmidt	5. Date July 23, 2010	

July 23, 2010

Ms. ShaRon Carlisle
Product Manager 34
Document Processing Desk (NOTIF)
Antimicrobial Division (AD)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency (US EPA)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Subject: UrthPRO (Active Ingredient: Ethyl Alcohol)
EPA Reg. No.: 84368 – 1

Dear Ms. Carlisle:

We request the following changes on the subject label:

1. Add the modifier “sealed” before “marble” and “stone” in the subject label. Thus, the label will subsequently read as sealed marble and sealed stone.
2. Delete the word “including” immediately before the listing of the bacteria and fungi for which the subject product is labeled.

In support of this request, attached are the following documents:

- Application for Pesticide Registration (EPA Form 8570-1)
- One copy of the label with all proposed changes highlighted
- 5 copies of the draft label

PR Notice 98-10, Section IIC “Adding an Indoor, Nonfood Site for an Antimicrobial Product” allows the addition of the word “sealed” and deletion of “including” are allowed if the following conditions are met:

1. *no additional data (such as efficacy data for public health pests, groundwater data, ecological effects data) are required for the added nonfood site;*
2. *this site is within an already registered use pattern category for the product (as specified in 40 CFR Part 158);*
3. *exposure is not increased (examples of increased exposure include adding use in paints to a product registered for caulking, or adding broadcast treatment to a product registered for spot treatment);*
4. *an agency decision or directive does not explicitly prohibit addition of nonfood sites to particular products;*
5. *the labeling of the technical product from which the end use product is formulated does not prohibit the proposed site; and*
6. *the dosage, concentration, frequency or method of application are not changed.*

All of the above conditions are met in this case.

Since this action is non-PRIA action, no fee is associated with this request.

Ph: 517-881-0106 ** Fax: 517-336-9788 ** email: omesserschmidt@comcast.net

4/17

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions, please don't hesitate to contact me directly at 517-881-0106 or by email at omesserschmidt@comcast.net

Sincerely,



Olav Messerschmidt
Registration Agent for UrthTech, LLC

5/17

Deleted: B

Master Label:

UrthPRO™ Cleaner, Disinfectant and Fungicide
Kills Mold, Fungi, Viruses 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.)

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

EPA Reg. No. 84368 - 1

EPA Est. No. XXXX - YY

URTH Tech LLC
30777 Northwestern Hwy, Suite 300
Farmington Hills, MI 48334

NOTIFICATION
Date Reviewed: 8/30/10
Reviewed By: [Signature]

8/17

Deleted: B

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

GENERAL CLAIMS:

<ul style="list-style-type: none"> • Controls fungi, <u>Trichophyton mentagrophytes</u>, and bacteria <u>Salmonella enterica</u>, <u>Staphylococcus aureus</u> and <u>Pseudomonas aeruginosa</u> on hard, non-porous surfaces • Contains no bleach or acid • Kills fungi, viruses and bacteria • Eliminates musty odors • Colorless • Mold Control on hard, non-porous surfaces • Mildew stain remover • Bacterial disinfectant • General disinfectant • URTH's patented technology kills [destroys] mold and fungi, <u>Trichophyton mentagrophytes</u>, bacteria, <u>Salmonella enterica</u>, <u>Staphylococcus aureus</u> and <u>Pseudomonas aeruginosa</u> in 5 minutes, and all influenza A viruses [including Pandemic 2009 H1N1 influenza A virus]. • Works in hard to clean places (sealed tile grout, caulking and corners) without scrubbing. • Kills fungi, viruses and bacteria in hard to clean places including: <ul style="list-style-type: none"> o Basements o Bathrooms o Vacation homes o Boat interiors o Areas under construction • For use in homes, businesses, institutions, hospitals • Colorless • No fumes • Fungicide • Effective against [fungi] and [bacteria] • Controls odor causing mold and fungi on hard, non-porous surfaces • Deodorizer • URTH is [specially formulated] for effective [control] [elimination] of [most] offensive [stains] [odors] caused by mold, mildew and bacteria. • Controls mold [leaving a fresh clean scent] [leaving rooms clean and 	<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 • 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
---	--

Deleted: including

Deleted: including

Deleted: including

Deleted: including

Deleted: B

<p>fresh smelling].</p> <ul style="list-style-type: none"> • Eliminates musty odors [caused by mold on hard, non-porous surfaces]. • URTH disinfects in 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] [www.urthpro.com] [www.urthtech.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] [[harsh] acids] • Contains no [artificial – or - [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 	<p>including (list any surface(s) from list 2 or 3)</p> <ul style="list-style-type: none"> • [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- harmful chemicals • Degreaser [Degreases]
<p>DISINFECTANT/FUNGICIDE CLAIMS</p>	
<ul style="list-style-type: none"> • Antibacterial • Can help reduce the risk of cross- 	<ul style="list-style-type: none"> • [Kills] [eliminates] [destroys] [removes] [bacteria] [and/or] fungi on:

8/17

Deleted: B

<p>contamination</p> <ul style="list-style-type: none"> • 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] • [lightly] cleans and [kills] [eliminates] [destroys] [removes] [the most common] [kitchen] [bacteria] [and] [fungi] • Kills [fungi] [bacteria] in 5 minutes • Kills household germs [such as] [bacteria] [viruses] [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] [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] 	<p>(list any surface from list 2 or 3)</p> <ul style="list-style-type: none"> • [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]

Deleted: [including]

9/17

Deleted: B

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 • 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 • Sealed cement • Ceramic Tile 	<ul style="list-style-type: none"> • Sealed Hardwood • [floors] • Chrome • Corian • Floor surfaces • Formica • Glass 	<ul style="list-style-type: none"> • Sealed granite • Linoleum • Sealed Marble • Metal • Painted wallboard • 	<ul style="list-style-type: none"> • Glazed porcelain • Stainless Steel • Tile • Vinyl • Sealed Wood • Sealed 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, *Trichophyton mentagrophytes* (ATCC #9533).

Deleted: including

UrthPRO kills influenza A viruses within a 1-minute contact time.

Deleted: B

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, *Salmonella enterica*, *Staphylococcus aureus* and *Pseudomonas aeruginosa*, mold and fungi, *Trichophyton mentagrophytes*, in 5 minutes, and influenza A viruses in 1 minute.

Deleted: including

Deleted: including

URTHPRO destroys odor, stain causing or other damage causing organisms including mold and mildew on hard, non-porous surfaces including 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 must 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 PROUCT 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.

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 must survey their buildings at least monthly for any of the following conditions. When they are found, they must 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 must 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 must 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 wet

12/17

Deleted: B

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, *Salmonella enterica*, *Staphylococcus aureus* and *Pseudomonas aeruginosa*, mold and fungi, *Trichophyton mentagrophytes*, in 5 minutes, and influenza A viruses in 1 minute.

Deleted: including

Deleted: including

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 in 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

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 must 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 must 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.

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 must be placed in plastic bags that must then be sealed before being removed. Larger items that cannot be safely packaged must be treated before being moved through occupied spaces.

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.

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

16/17

Deleted: B

**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, 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.

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 common household germs such bacteria, mold, viruses 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> Organisms (List 3): All influenza A viruses [including Pandemic 2009 H1N1 influenza A virus].
{Optional} 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.

[Residential - Household label]

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. Nonrefillable container. Do not reuse or refill this container. If empty: 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.

[Commercial, institutional and industrial]

STORAGE and DISPOSAL

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

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

Pesticide Disposal: Triple rinse container (or equivalent) promptly after emptying. Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.