

84602-1

1-18-2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Date of Issuance:
Number: 84602-1
JAN 18 2008

Term of Issuance:
Conditional

Name of Pesticide Product:
Moldbuster

NOTICE OF PESTICIDE:

x Registration
Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Brinton Products, Ltd.
P.O. Box 46871
London SW11 6XY

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(a) provided that you:

- 1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
2. Make the labeling change listed below before you release the product for shipment:

Revise the EPA Registration Number to read, "EPA Reg. No. 84602-1"

Signature of Approving Official:

Velma Noble
Product Manager Team-31
Regulatory Management Branch I
Antimicrobials Division (7510P)

Date:

JAN 18 2008

EPA Form 8570-6

CONCURRENCES

Table with columns for SYMBOL, SURNAME, DATE and several empty columns for signatures.

3. You have requested waivers for the toxicity data requirements of primary eye irritation and primary skin irritation. These waivers have been granted and toxicity category I has been assigned for each. Since you have used the cite all method of support to meet the requirement for additional product specific toxicity data, revise your labeling to be in agreement with these other products as follows:

“DANGER Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed, *absorbed through the skin or inhaled*. Do not get in eyes, on skin or on clothing. *Avoid breathing vapor or spray mist*. Wear protective eyewear (goggles, safety glasses...”

Add the following to the “First Aid” statement:

“*IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible.*”

4. Based on the proposed uses bring this label into agreement with the ADBAC Reregistration Eligibility Document RED (completed August 2006) by limiting this product to residential use only. Add the following statement to the beginning of the text on page two: “**Residential Use Only.**”

5. Revise the bulleted statements at the top of page two as follows:

- a. Delete the phrase: “Makes [insert number] gallons [5x the container size]”. The Agency has revised your use rate (see item #7).
- b. Delete the following use sites as your label does not include adequate directions for these uses. Delete “yards” and “all outdoor hard surfaces.” All outdoor surfaces is too broad since specific directions are required for many sites including application to siding and roofs.
- c. Delete the unnecessary statement: “Children and pets need not be excluded from treated areas once dry.”

6. PR Notice 2000-5 addresses mandatory language in the directions for use section of the label. Based on this Notice revise the first section in the left column of page two to begin: “Moldbuster kills and removes mold, mildew and algae on outdoor...” In addition, delete the statement: “Moldbuster prevents early re-growth.” This statement is contradictory and misleading since the product claims to kill mold there should not be any occurrences of regrowth.

7. The ADBAC RED limits the use of this chemical when applied to the types of outdoor surfaces listed on your label. Based on this RED and the applicable use sites on your label, reduce your rate to be in agreement with the RED at a rate no greater than 2036 ppm active ingredient. This rate is based on the Occupational & Residential Exposure Assessment. Thus delete “Mix 1 part Moldbuster to 4 parts water.” Revise to read: “*Mix 3.45 ounces of Moldbuster per gallon of water (2021 ppm).*”

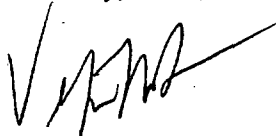
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- 8. The decking use is restricted due to ecological concerns. Add the following statement: *"At the maximum rate of 2021 ppm do not exceed an application rate of 25 gallons per 1000 square feet of treated area."*
- 9. Add the following statement to directions for use section of the label: *"Treatment limited to 6 times per year."* This statement is also based on concerns raised in the ADBAD RED.
- 10. Revise the section beginning REACTION TIME. Delete the phrase: "and helps to clean the treated surfaces in the weeks and months to come." This is a residual cleaning claim which the Agency does not allow since it implies residual pesticidal kill which is misleading. In addition, the non-pesticidal claims must be in agreement with the pesticidal claims. This product is not killing for weeks, neither is it cleaning for weeks.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Submit one (1) copy of your final printed labeling prior to release of this product for shipment. If you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble  
 Product Manager 31  
 Regulatory Branch I  
 Antimicrobials Division (7510P)

Enclosure: (Stamped Label)

7510P:T. Lantz:1/14/08:84602-1

CONCURRENCES

SYMBOL	SURNAME	DATE					

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**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER.** Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles, safety glasses or face shield), protective clothing and protective gloves (rubber or chemical resistant). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

*(If container size is 5 gallons or more, add the following Environmental Hazards statement:)*

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 authority 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.

**ACCEPTED**  
with **COMMENTS**  
in EPA Letter Dated:  
**JAN 18 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. **84602-1**

**MOLDBUSTER**

**Active Ingredients:**

Alkyl (C<sub>14</sub> 50%, C<sub>12</sub> 40%, C<sub>16</sub> 10%)

dimethyl benzyl ammonium chloride ..... 7.5%

Other Ingredients:..... 92.5%

Total: ..... 100.0%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

See [right] [left] [side] [back] panel for additional  
Precautionary Statements [and First Aid]

**FIRST AID**

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes. Call a poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No.

EPA Est. No.

Net Contents: [1 quart] [½ gallon] [1 gallon] [1½ gallon] [2 gallons] [2½ gallons] [3 gallons] [5 gallons]

Brinton Products Ltd.

P. O. Box 46871

London SW11 6XY

www.brintonproducts.co.uk

*(Note to reviewer: Language in [ ] is optional or interchangeable)*

For Residential Use Only

- Kills Mold, Mildew & Algae
- No Bleach/Acids
- No scrubbing or pressure-washing
- ~~\_\_\_\_\_~~
- Surfaces: Patios, fencing, decking, driveways, sheds, ~~\_\_\_\_\_~~ garden furniture ~~\_\_\_\_\_~~
- ~~\_\_\_\_\_~~

~~\_\_\_\_\_~~ MOLDBUSTER kills and removes mold, mildew and algae on outdoor hard surfaces such as patios, fencing and driveways. ~~\_\_\_\_\_~~

**DIRECTIONS FOR USE**

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

**TO KILL AND CONTROL MOLD, ALGAE AND MILDEW:**

Apply to dry surfaces. ~~\_\_\_\_\_~~  
Apply use solution to infested areas with a low-pressure garden sprayer or watering can until surface is thoroughly saturated. Allow to air dry.

3.45 ounces/gallon

Best applied in late afternoon or early evening to avoid rapid evaporation. Rinse out sprayer or watering can after use. Do not apply if rain is expected in the next 5 - 6 hours.

**REACTION TIME:** Kills mold, algae and mildew within 2 - 4 days and ~~\_\_\_\_\_~~

~~\_\_\_\_\_~~. Some concrete and hard surfaces may turn rusty brown in patches, this is a normal reaction and discoloration will soon dissipate.

Unprotected persons and animal should be kept away from treated areas until surfaces are dry.

Avoid contact with plant life. In the event of contact, flush with clean water.

(If container size is one gallon or less, the following Storage and Disposal directions will be used.)

**STORAGE AND DISPOSAL**

Store in original container in areas inaccessible to children. Do not reuse empty container. (Wrap and) Discard in trash or recycle.

(If container size is greater than one gallon, the following Storage and Disposal directions will be used.)

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE**

Store in original container in areas inaccessible to children. Keep securely closed. Do not reuse empty container.

**PESTICIDE DISPOSAL**

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instruction, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL**

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.

(Note to reviewer: Language in [ ] is optional or interchangeable)