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RE: EPA Updates Electrostatic Sprayer Guidelines

Dear Midlab Customer:

EPA has published important new guidelines for the use of electrostatic sprayers on its List N FAQ pages. The notification also addresses fumigation and wide-area spraying.

Most significantly, EPA no longer recommends against using fumigation or wide-area spraying. Fogging, fumigation, and wide-area or electrostatic spraying are no longer excluded as appropriate methods of disinfection against Covid-19.

The EPA has also pulled back from earlier language that fogging or electrostatic spraying, unless specifically listed on the product label, is a violation of FIFRA regulation. It is less clear here what they now intend. There is no longer explicit language forbidding alternative spraying methods not listed on the label, but EPA also does not support them:

A disinfectant product's safety and effectiveness may change based on how you use it. If a disinfectant product's label does not include disinfection directions for a certain method of application, EPA has not reviewed any data on whether the product is safe and effective when used in this way.

Until EPA clears up this uncertainty, we think it is best to give our customers the relevant information and let them decide how best to proceed. If it is decided to use electrostatic or other wide-area spray methods, we recommend the following.

For efficacy, always follow label instructions, especially noting contact times. For safety, always following the manufacturer's instructions and wear appropriate PPE. OSHA 1910.134 provides the applicable standard for respiratory protection.

To address the use of newer technologies, Midlab is currently testing the efficacy of our products using electrostatic spraying. We hope to have the new claim on our Facility+ label in the near future and will keep you up to date on our progress.

Links

<https://www.epa.gov/coronavirus/can-i-apply-product-using-method-not-specified-directions-use>
<https://www.epa.gov/coronavirus/can-i-use-fumigation-or-wide-area-spraying-help-control-covid-19>
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

Please let me know if I can answer any question.

Thank you.

Sincerely,

Matt Schenk
President
Midlab, Inc.