



Dear Bill,

Thank you for sharing your questions with us. After internal review with our subject matter experts, ICP is comfortable and confident you have the right product for your bus & van disinfecting operations. Below, we have outlined key points that we believe address your concerns.

The EPA-registered disinfectant product label is the authoritative source of information on how and how not to use the product. In EPA's own [words](#):

*"Unlike most other types of product **labels**, pesticide **labels** are legally enforceable, and all of them carry the statement: "It is a violation of Federal **law** to use this product in a manner inconsistent with its **labeling**." In other words, the **label is the law**."*

Obviously, no label can be infinitely comprehensive, and there is inevitable interpretation, but we must always start with and defer to the EPA label, and any version of that label registered in the US state where the product is to be used.

The [8316 ShockWave RTU](#) Label mentions insofar as "children", that the product should be safely stored and to keep out of reach of children. This does not mean that the product cannot be used on surfaces or to disinfect surfaces that children may interface with afterwards. Please ensure that all your products are clearly labeled and stored appropriately. We are always willing to provide you at no cost official Secondary Use Labels for you trigger spray bottles, electric sprayer reservoirs, and similar containers used in application.

Returning to the 8316 ShockWave RTU label regarding steps after application and contact time: Rinsing or wiping down with water after application is not necessary. The label does mention this should be done on food contact surfaces such as cutting boards. However, this does not have to be done in a van or bus because they are not considered a food contact surface.

Concerning any equipment for the application process, the key objectives are a consistent wet surface during the contact time, and then people may use the disinfected surfaces when tangibly dry (to touch). Based on your application process, both objectives will be met using the approved disinfecting foggers, as well as the trigger bottles for targeted application to high touch areas. Air drying is acceptable. Albeit fluctuation for humidity and temperature, the disinfectant will dry quickly because your methods are assuring contact time while avoiding saturation and over-application. Again: Dry to the touch is the criteria to resume use of disinfected surfaces.

We are confident that [8316 ShockWave RTU](#), used as described, fulfills the Centers for Disease Control (CDC) requirements for daily disinfection. We can also assure that 8316 ShockWave RTU is included on [EPA's List N of disinfectants](#) effective against SARS-CoV-2 (COVID-19). The ShockWave RTU is a



antimicrobial cleaner and disinfectant that is practical for everyday use around students, yet sufficiently robust to kill pathogenic viruses, bacteria and mold.

Please do not hesitate to reach out to us if you have any other questions.

Best Regards,

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