Applying a product using a method that is not specified in the directions for use.

Disinfection directions for fogging, fumigation, wide-area or electrostatic spraying.

The EPA has recently issued guidance to follow on product application in its online publication Frequent Questions about Disinfectants and Coronavirus (COVID-19). Two Q&A’s address product application.

EPA Frequently Asked Question One

Can I apply a product using a method that is not specified in the directions for use?

Any time you use an EPA-registered disinfectant, you should read the product label and follow the directions, including the method of application. This is the best way to ensure the product will safely kill pathogens that cause human illness.

A disinfectant product’s safety and effectiveness may change based on how you use it. If a disinfectant product’s label doesn’t 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.

EPA’s regulatory process ensures that all registered disinfectant products legally sold in the United States include directions for use which, if followed, will allow a product to carry out its intended function without resulting in unreasonable adverse effects on the environment.

Before using a product, always read its label and follow its instructions, including the application method.

EPA Guidance on Product Application

EPA Frequently Asked Question Two

Can I use fumigation or wide-area spraying to help control COVID-19?

Unless the pesticide product label specifically includes disinfection directions for fogging, fumigation, or wide-area or electrostatic spraying, EPA does not recommend using these methods to apply disinfectants. EPA has not evaluated the product’s safety and efficacy for methods not addressed on the label.

A disinfectant product’s safety and effectiveness may change based on how you use it. If a pesticide product’s label does not include disinfection directions for use with fogging, fumigation, wide-area, or electrostatic spraying, EPA has not reviewed any data on whether the product is safe and effective when used by those methods.

The Centers for Disease Control and Prevention (CDC) recommends that you clean contaminated surfaces with liquid disinfectant products to prevent the spread of disease. Read CDC’s recommendations.

EPA Guidance on Fogging, Fumigation, Wide-area or Electrostatic Spraying

What does this mean for application of EPA COVID-19 approved disinfectants?

It is very clear, applying product with an application method that is NOT specifically stated on the label, is not recommended by the EPA. Additionally, EPA registered disinfectant labels state “It is a violation of Federal law to use this product in a manner inconsistent with its labeling.”

Can Hillyard disinfectants approved for COVID-19 be applied via spray application?

Yes. Hillyard has products that can be spray applied via low pressure coarse sprayers and hand pump trigger sprayers as well as other methods. Click here for the application method chart. Hillyard has also conducted a time study on application methods that can be helpful in developing application protocols. Click here for the study.  Read the product label instructions.

Can Hillyard disinfectants approved for COVID-19 be applied via Protexus Handheld & Backpack Sprayers?

Yes. Hillyard disinfectants QT®-3 and QT-TB®, approved for COVID-19, can be applied via Protexus sprayers when the switch on the sprayer is set to non-electrostatic mode. Click here for the application method chart.

Can Purtabs be applied via a Protexus sprayer set to electrostatic mode?

Based on the recent EPA ruling stated above, it is our interpretation that Purtabs does not have language on its label specifically stating that it can be applied via electrostatic sprayers in electrostatic mode. Therefore, according to the guidance from the EPA, our interpretation would be Purtabs cannot, within federal law (FIFRA) be applied through a Protexus sprayer in electrostatic mode.

Do electrostatic sprayers still have benefits if they are not used with the electrostatic function enabled?

Yes, electrostatic sprayers, like the Protexus sprayer, will still provide a very efficient method of applying disinfectants to surfaces.

What changes when an electrostatic sprayer is used with the electrostatic function turned off?

When the electrostatic function is turned off, the disinfectant wrap around effect does not happen. Therefore, it is important to spray surfaces from multiple angles to achieve coverage over all areas requiring disinfection. It is important to note, even in electrostatic mode, the “wrap around” effect may not provide enough coverage to ensure the proper contact time for efficacy, especially on non-metallic horizontal surfaces like desks.