

To: Jackson, Ryan[jackson.ryan@epa.gov]
From: Stratton Edwards
Sent: Sat 10/21/2017 12:28:11 AM
Subject: Re: Waiver letter
[attachment 1.pdf](#)
[ATT00001.htm](#)

This should be it. Let me know if you have any questions or if there is someone at the agency I should work with in this. Thanks for all your help.

On Oct 20, 2017, at 7:51 PM, Jackson, Ryan <jackson.ryan@epa.gov> wrote:

I didn't.

From: Stratton Edwards [<mailto:sedwards@capitolhillcg.com>]
Sent: Wednesday, October 11, 2017 9:38 AM
To: Jackson, Ryan <jackson.ryan@epa.gov>
Subject: Waiver letter

Ryan,

Did you get the letter I sent? I resent it right after we left your office last week? I want to make sure my communications are coming through.

Stratton



September 13, 2017

The Honorable Scott Pruitt
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Pruitt,

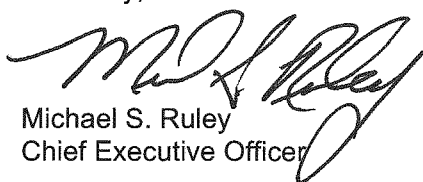
I write to request an Emergency Exemption that allows us to assist with post hurricane efforts while our application for registration is being reviewed. Allied Bioscience Inc. (ABS) is a research and development company that is currently working with a D.C. based EPA consulting firm to register potent antimicrobial surface coatings with residual antimicrobial efficacy. Our coating doesn't clean the contaminated area, but creates a new surface that continuously inhibits mold and other microbial contaminants from surviving on that surface. ABS's formulation contains an active ingredient already registered with the EPA at concentrations deemed to be safe. Toxicity studies conducted at a GLP facility and under GLP guidelines revealed that the coating belongs to category IV status, confirming that the product does not require first aid or precautionary statements on its EPA label.

Hurricanes Harvey and Irma have created ideal conditions for mold and mildew infestations in Texas and Florida. Mold spores travel through air, resist adverse environmental conditions, and are capable of surviving a long time. Application of an appropriate antimicrobial surface treatment to structures, vehicles, and other impacted sites to mitigate the growth of mold and mildew is needed to ensure long-term viability of cleanup efforts. According to FEMA and CDC, in the aftermath of major hurricanes or floods, buildings wet for more than 48 hours will generally support visible and extensive mold growth. Additionally, in Texas there has been extensive reporting on other contaminants in the flood water, particularly *E. coli*.

Mold can accumulate in homes, schools, hospitals and all public buildings alike. Buildings and homes that are not properly cleaned and protected from mold and other contaminants could cause health issues for the residents for years as we have learned from hurricane Katrina and monitoring the long-term effectiveness of rebuilding efforts. One-time contact cleaning alone will not provide a solution that will kill or protect against future growth of mold and provide long-term protection to the cleaning crews or returning residents.

This is an unprecedented public health crisis not just affecting homes, but all public buildings including hospitals, schools, libraries and all commercial buildings. Due to the widespread, extensive hurricane damage, an adequate supply of alternative treatment solutions may be unavailable to meet urgent demands. Our coating is safe and we are asking for an Emergency Exemption that allows us to assist with post hurricane efforts while our application for registration is being reviewed.

Sincerely,



Michael S. Ruley
Chief Executive Officer