United States
ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

Notice of Inspection
Office of Enforcement and Compliance Assurance

Facility Name	Facility Address
Verataur, LLC	602 Vortex Drive, New Iberia, LA 70560
Name of Facility Official: Gene Garber	Title: Manager

By my signature, I represent that I am an owner, operator or agent in charge of the facility being inspected, and attest that the EPA, Designated State or Political Subdivision Employee or Officer identified on this form presented his or her credentials prior to issuing this Notice of Inspection.

Facility Official's Signature: X

Authority for Inspection

For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled and released for shipment, and samples of any containers or labeling for such pesticides or devices, in places where pesticides or devices are held for distribution or sale [FIFRA § 9(a) (7 U.S.C. §136g)]; and for the purpose of inspecting and obtaining copies of those records specified in FIFRA §8 (7 U.S.C. §136f) and 40 C.F.R. Part 169.

Reasons for Inspections (Check applicable boxes)

- ☐ Routine Inspection
- ☒ For Cause Inspection — Violation Suspected: Section 12 (a)(1)(A)

Additional Information:

Name of Inspector	Macy Vizier		
Signature of Inspector		Date	June 16, 2021
Title	AES Inspector III	Time	
Address	EPA Region 6, 1201 Elm Street, Dallas, TX 75270-2162		

Note: The absence of a Facility Official's signature on this form does not invalidate this Notice of Inspection, or establish that consent to the inspection was not provided or that the proper procedures were not followed.

veratur
PRODUCTS & SOLUTIONS

April 10, 2021

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270
Lee McMillan
Lawrence Pittman
Margaret Osbourne, Chief
Waste Enforcement Branch

RE: Verataur, LLC's response to the April 1st 2021 Notice of Potential Violation and Opportunity to Confer Federal Insecticide, Fungicide, and Rodenticide Act

Dear Lee McMillan, Lawrence Pittman, and Margaret Osbourne.

Verataur, LLC is in receipt of your April 1st 2021 notice and offer the following but not limited responses.

1) The notice states "On February 5, 2021, the EPA, Region 6 conducted an investigation of Verataur, LLC's facility located in New Iberia, Louisiana.
RESPONSE: Verataur is unaware of any such inspection of our facility as mentioned in said notice.

2) The notice states "Unregistered Product – Distribution or sale of the pesticide product BioErase Wipes, which is not registered with the EPA pursuant to Section 3 of FIFRA, 7 U.S.C. § 136a, in potential
violation of Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A)"
RESPONSE: Verataur agrees that our product BioErase Wipes is not registered with the United States Environmental Protection Agency (EPA).

602 Vortex Drive
New Iberia, LA 70560

PHONE 888-964-3544
EMAIL Info@verataur.com

3) Based on the style and content of this notice, EPA Region 6 may not have considered the fact that our product was offered as a FIFRA 25 (b) Exempt product.

Our label clearly states the following: **EPA EXEMPTED PRODUCT**
This product is exempt from EPA
Registration under minimal risks
pesticides exemption FIFRA Section 25b.

Further evidence that the EPA Region 6 may not have taken FIFRA 25 (b) Exemption into consideration is that the "Enclosure/Attachment: Additional Sources of Information" which was tendered by the EPA Region 6 in this notice as 100% of the additional sources of information all pertain to the regulations set forth for FIFRA Registered products or of those that must be considered under FIFRA Registration.

The Active ingredient in BioErase has been carefully chosen from the EPA's own website that discloses FIFRA 25 (B) EXEMPT Active Ingredients that are acceptable under stated exemption. Further, the Inert ingredients in BioErase have also been carefully chosen from the EPA's own website that discloses FIFRA 25 (B) EXEMPT Inert Ingredients that are acceptable under stated exemption.

In addition, the FIFRA 25 (b) Exemption directives were carefully reviewed and followed when creating our label for BioErase.

Regards,

Gene Garber
Verataur, LLC

602 Vortex Drive
New Iberia, LA 70560

PHONE 888-964-3544
EMAIL Info@verataur.com

United States
ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

Receipt for Samples
Office of Enforcement and Compliance Assurance

Facility Name Veratour, LLC	Facility Address 602 Vortex Drive New Iberia, LA 70560
Name of Facility Official Gene Garber	Title Manager

Samples Collected (Assign sample number and describe fully (e.g., product name, size, quantity, registration, establishment, lot, batch, model and/or serial numbers, etc.)) The following samples were collected by or on behalf of the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. §136g).

Letter of response between EPA and Veratour. Pictures were obtained from facility of products.

☐ Duplicate samples requested and provided	☐ Duplicate samples not requested	Amount paid	☐ Cash ☐ Credit Card ☐ No Charge

Acknowledgement of Samples Collected: The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled and released for shipment.

Facility Official Signature X G Garber	Date 6-16-21
Name of Inspector Mary Vizier	Title AES Inspector III
Signature of Inspector Mary Vizier	Date 6-16-21
Address EPA Region 6, 1201 Elm Street, Dallas, TX 75270-2102	