Sanitizer, Disinfectant, and Antimicrobial Q&A for Businesses and Facilities

Helpful information for businesses and facilities using sanitizers, disinfectants, and antimicrobials against SARS-CoV-2, the novel coronavirus that causes COVID-19.

The Michigan Department of Agriculture and Rural Development (MDARD) is providing the following guidance to aid your business or facility in complying with state and federal pesticide use laws. If you have questions, please contact MDARD at 1-800-292-3939 or visit us online at Michigan.gov/MDARDPest.

General Questions

1. **Why do pesticide rules pertain to sanitizers and disinfectants?**
   Pesticides are defined in state and federal laws as substances that prevent, destroy, repel, or mitigate pests. Because sanitizers and disinfectants claim they kill viruses, bacteria, fungi, and other microorganisms, they are pesticides by law.

2. **What is the difference between cleaners, sanitizers, disinfectants, and antimicrobials?**
   In this guidance, "pests" are bacteria, viruses, fungi, germs, or microbes. Cleaners do not kill pests, and cleaners cannot legally claim they will kill pests. Disinfectants are used on non-living objects to kill or inactivate pests. Sanitizers reduce, but don't necessarily eliminate, pests from non-living objects to levels considered safe by public health codes or regulations. Both sanitizers and disinfectants are also called antimicrobials - and all three are pesticides. Find more information at https://www.epa.gov/pesticide-registration/what-are-antimicrobial-pesticides.

3. **Is "hand sanitizer" the same as "sanitizer"?**
   No. Hand sanitizers, antiseptic washes and antibacterial soaps are not regulated as pesticides, because they are used to kill microbes in or on a person. The Food and Drug Administration (FDA) regulates these products. Sanitizers used on inanimate objects such as countertops and floors are regulated as pesticides.

Business Licensing

4. **Does my company need a Pesticide Application Business License to apply sanitizers and disinfectants?**
   If your business **does not** offer sanitization or disinfection services for hire, your firm is not required to obtain a Pesticide Application Business License (PABL) from MDARD. Some examples include, but aren't limited to, schools, municipalities, and store employees treating their own store.

   If your business **does** offer sanitation or disinfection services for hire, you may need a PABL:
   a) A PABL is required when applying "General Use" sanitizers and disinfectants outdoors, to cooling towers, or when there is potential for movement to surface or groundwater. Some examples include spraying sidewalks or playground equipment with a disinfectant.

b) A PABL is required when applying “Restricted Use” pesticides regardless of where the pesticide is applied.
c) A PABL is not required when applying “General Use” sanitizers and disinfectants indoors, if there is no potential for movement to affect surface or groundwater. See question #6 for additional information.

Applicator Certification

5. **Do my employees need to be MDARD certified pesticide applicators to apply sanitizers and disinfectants?**
   Maybe. For businesses not applying pesticides for hire, the answer depends on if the product you want to use is general use or restricted use; if the product is a ready-to-use pesticide; or, if applications could result in movement to surface or groundwater:
   a) Application of a general ready-to-use pesticide (does not say “Restricted Use Pesticide” on the label and can be applied from its original container without any mixing or loading, such as an aerosol can): no certification is required.
   b) Application of a “Restricted Use” pesticide: certification is always required.
   c) Application of a general use, non-ready-to-use pesticide: Indoors, with no potential for movement to affect surface or groundwater: no certification is required. Potential for movement to affect surface or groundwater (typically outdoors, to cooling towers, or in ventilation system with discharge piping to exteriors): certification is required. For businesses applying pesticides for hire: If your business needs a PABL License (see question #4), then your employees need to be certified commercial applicators.

6. **If I apply a disinfectant indoors which drains to a sanitary sewer or a septic system, is it considered movement that can affect surface or groundwater?**
   No. For example, an indoor disinfecting treatment traveling through bathroom plumbing or approved floor drains connecting to sanitary sewers would not require a certified applicator or a PABL.

7. **What categories should applicators be certified in to apply sanitizers and disinfectants?**
   Government employees must be certified in Commercial Core and category 8, Public Health Pest Management, or category 5B, Microbial Pest Management. Non-government employees need category 5B. The exam for 5B combines the category and the Commercial Core exam in one test.

Sanitizers, Disinfectants, and Your Business or Facility

8. **Is bleach a pesticide?**
   Because bleach can be used for cleaning, whitening, and sanitizing or disinfecting, bleach is a pesticide only when its label or advertising makes pesticidal claims, including but not limited to, “Kills 99.9% of bacteria and viruses!” An easy way to tell if bleach is a pesticide is to look for an EPA Registration Number on the label. If there’s an EPA Reg. Number, it’s a pesticide.

9. **What sanitizers and disinfectants can my employees use to combat SARS-CoV-2?**
   The United States Environmental Protection Agency (EPA) has compiled a list of products to use against SARS-CoV-2, the novel coronavirus that causes COVID-19.

10. **Can I provide free, bottled disinfectant to customers for use on countertops, playground equipment, and other surfaces?**
    You can only provide disinfectant already packaged in the manufacturer's unbroken, labeled container. You **cannot** open packaged sanitizers and disinfectants, dilute the solution, reformulate, add soap or other ingredients or scents, repackage, fill into customers' containers, or otherwise make your own disinfectant. Such activities constitute pesticide manufacturing and require production in an EPA-registered pesticide-producing establishment.

11. **Can I provide bottled hand sanitizer to customers?**
    Probably. When hand sanitizer is used to kill microbes in or on a person, it is not considered a pesticide. Prior to manufacturing or distributing hand sanitizer, it is advised you check with FDA to ensure you comply compliance with their laws.

12. **Can my company provide outdoor sanitization/disinfection services to sidewalks, vehicle exteriors, and playground equipment?** Your company will need a Pesticide Application Business License in Category 5B, Microbial Pest Management. In addition, there are many laws governing the use of pesticides, such as requirements for applicator certification, vehicle signage, customer receipt requirements, pesticide application recordkeeping, safe transportation/storage/disposal, and personal protective equipment. Call 1-800-292-3939 to discuss licensing, certification, and pesticide use laws with an Inspector.

13. **Can my power washing company provide outdoor sanitization/disinfection services?** Power washers must be aware of the application process and wind conditions that could cause drift and exposure to people or pets and damage to plants or property. Using pesticides in a manner resulting in drift is a violation of state pesticide use laws. See question #12 for additional information.

14. **Can I spray antimicrobial coatings for hire to protect surfaces from SARS-CoV-2?**
    You cannot make claims about how long a surface is protected that go above and beyond claims present on the product label. See question #4 for additional information.

15. **Can I claim the disinfectant I use kills COVID-19?**
    No. COVID-19 is the name of the disease caused by the novel coronavirus SARS-CoV-2. No disinfectant can kill or treat a disease.

    Regarding SARS-CoV-2, businesses typically violate state and federal laws if they make pesticidal claims not present on the product's label. When pesticides are registered with the EPA, label claims are reviewed with supporting data to verify claims are legitimate. With SARS-CoV-2 as a new viral pathogen, labels do not yet specify the ability to kill SARS-CoV-2. If the product is found on EPA's List N, it can be used for disinfection against SARS-CoV-2. Updated labels or manufacturer websites might have one of the following claims for List N disinfectants, which firms can also utilize:

    a) *[Product name] has demonstrated effectiveness against viruses similar to SARS-CoV-2 on hard, [porous and/or non-porous surfaces]. Therefore, [product name] can be used against SARS-CoV-2 when used in accordance with the directions for use against [name of supporting virus(es)] on [hard, porous/non-porous*

surfaces]. Refer to the [CDC or OIE] website at [pathogen-specific website address] for additional information.

b) *COVID-19 is caused by SARS-CoV-2. [Product name] kills similar viruses and therefore can be used against SARS-CoV-2 when used in accordance with the directions for use against [name of supporting virus(es)] on [hard, porous/non-porous surfaces]. Refer to the [CDC or OIE] website at [website address] for additional information.*

For additional information, visit the EPA website.

16. Can I claim the disinfectant I use is safer than other chemicals?

No. It is against the law to make comparative statements about pesticide safety that are not on the pesticide label and have not been approved by US EPA.

17. What responsibilities do I have when applying a sanitizer or disinfectant?

Everyone is required by state and federal law to follow directions on the pesticide label. The label is the law. Read the label carefully. If the product is being used for SARS-CoV-2, look at EPA's List N to find out which directions on the label (for which microbe) you should follow. Ensure the product label allows for use at your intended application site (ex. hospital) and surface (ex. non-porous countertops). Follow requirements for dilution rates; for personal protective equipment; and for time the product must remain wet on the surface. If your business requires a PABL, there are many more pesticide use laws to follows contact your inspector with questions.

18. How do I select a disinfectant correctly for SARS-CoV-2?

a. Locate products suitable for use against SARS-CoV-2 on EPA's List N. See question #15 for additional information.
b. Ensure your application site and surface you want to treat are listed on the product label. For example, if you treat a bathroom fixture at a daycare, ensure both the daycare and directions for disinfecting hard, non-porous surfaces are listed on the label.
c. Ensure you use the correct set of instructions on the product label. Because labels may not yet specify the product can be used for COVID-19 disinfection, refer to List N again and look for the column titled "Follow the disinfection directions and preparation for the following virus". For example, if "norovirus" is listed in that column, go back to the product label and locate general directions **and** any specific directions for norovirus disinfection.
d. Ensure the product remains visibly wet on the treated surface for the required amount of time as listed on the label. You may have to reapply if it dries before the time is up.
e. Ensure you wear required personal protective equipment (PPE) according to the product label and state minimum requirements (long sleeves, long pants, protective footwear, and impervious gloves). Talk with an inspector for more details.
f. If fogging, make sure fogging directions on the label are specific for hard surface disinfecting. In addition, a higher level of PPE with specific respirators and cartridge requirements may also be required.

For more information, view the webinar from the National Pest Management Association at https://www.pestcontrolcoronavirus.com/.