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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

FEB 0 1 2000

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

DuPont Specialty Chemicals Jackson Laboratory, Chambers Works Deepwater, NJ 08023

- Mailed To: Attention: Rick Tinsworth, Jellinek, Schwartz & Connolly, Inc. Agent For DuPont Specialty Chemicals
- RE: MICROFREE BRAND B 507, EPA Reg. No. 69897-1 MICROFREE BRAND B 240, EPA Reg. No. 69897-2 MICROFREE BRAND B 558, EPA Reg. No. 69897-3 MICROFREE BRAND Z 200, EPA Reg. No. 69897-4 Your Re-Submission Dated 12/2/99

The four similar and related re-submissions referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to reinsert the "Environmental Hazards", and drinking water restriction statements, and to delete the "Manufacturing Intermediates" section, is acceptable with the following comment.

At your next regularly scheduled label printing, the **boldfaced** word "**Prohibitions**" in the "Storage and Disposal" section must be changed to "Storage".

A stamped copy ("Accepted With Comments") of each of the four labels referenced above is attached.

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely

Marshall Swindell, Product Manager Team 33, Regulatory Management Branch I Antimicrobials Division (7510C)

CONCURRENCES									
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Microfree[®] Brand B 240

A DuPont Antimicrobial Powder Formulation

A Microbiocide for Use in the Manufacture and Preservation of Commodity Products

Active Ingredients: Silver 0 Cupric Oxide 0

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0.19% 0.37%

Inert Ingredients: <u>99.4</u> TOTAL: 100.0

<u>99.44%</u> 100.00% ACCEPTED with COMMENTS in EPA Letter Dated:

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Under the Federal Insecticide, Fingicide, and Rodenticide Act as shended, for the pesticide, registered under EPA Reg. No.

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KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists. IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention. IF SWALLOWED: If swallowed, drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician or poison control center. Do not induce vomiting or give anything by mouth to an unconscious person. IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No. 69897-2 EPA Establishment No. 6342-OH-02

Net Contents: 1 gallon

Precautionary Statements FEB 0 1 2000 Hazards to Humans and Domestic Animals Under the Federal Insectcide, Burdelide

FEB 0 1 2000 Under the Federal Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 6 9 8 97 - 1

CAUTION

CAUTION: Harmful if swallowed, inhaled, or absorbed through the skin. (Wash thoroughly with soap and water after handling.) Avoid contact with eyes or skin. Avoid contamination of cooking utensils and food preparation surfaces. Avoid breathing dust. Remove contaminated clothing and wash before reuse.*

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Keep out of any natural body of water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product inconsistent with its labeling.

CLAIMS: Microfree[®] Brand B 240 is an antimicrobial powder for commercial use. It is designed to be incorporated into the materials listed below as part of the manufacturing process to impart antimicrobial activity to the manufactured materials. Microfree[®] Brand B 240 antimicrobial powder suppresses the growth of bacteria, mold, and fungi, including those responsible for unpleasant odors, and discoloration of the finished product.

Products containing Microfree[®] Brand B 240 may not make claims of antimicrobial activity other than protection of the article itself against growth of bacteria, mold, and fungi in the treated article. If growth of bacteria, mold, and fungi in the treated article would lead to unpleasant odors and discoloration of the treated article, then such a claim may be made.

This product may not be used for any applications involving food contact, food packaging, or human drinking water.

Finished Materials

Microfree[®] Brand B 240 may be incorporated into the following materials at the specified Maximum Inhibitory Concentrations (MIC) on a weight basis of finished products.

APPLICATION	MIC	
Plastics (see separate description of resins and applications)	15.0%	, , , , , , , , , , , , , , , , , , ,
Fibers (see separate description of resins and applications)	13.0 %	· · · · · · · · · · · · · · · · · · ·
Coatings (see separate description of resins and applications)	10.0%	، بار الم بار بار بار بار بار
Adhesives and Sealants (see sepaçate description of resins and applications)	10.0%	· · ·

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TYPES OF MATERIALS:

Plastics including films, sheets, slabs, and molded plastic parts: 1)

Resins: Including polyester (PET, PBT, and PEN), polyamide (Nylon), polyimide, polygropylene (PP), polyethylene (PE), polybutylene, polymethylpentene (PMP), polysiloxane, polyvinyl alcohol (PVOH), polyvinylacetate (PVA), ethylenevinylacetate (EVA), polyethylene copolymer, polyvinyl chloride (PVC), epoxy, phenolic, polycarbonate, cellulosics, cellulose acetate, polystyrene, polyurethane, acrylic, polymethyl methacrylate, acrylonitrile-butadiene-styrene copolymer (ABS). acrylonitrile-stylrene-acrylic copolymers (ASA), acetals, polyketones, polyphenylene ether, polyphenylene sulfide, polyphenylene oxide, polysulfones, liquid crystal polymers and fluoropolymers, amino resins, thermo plastic elastomers, rubbers (including styrene butadiene rubber, acrylonitrile butadiene rubber, CR), polyacetal (polyoxymethylene), and blends and copolymers thereof.

Applications: This product may not be used for any applications involving food contact, food packaging, or human drinking water. Applications including automobile parts, shower curtains, mats, protective covers, tape, packaging, gaskets, waste containers, general purpose containers, brush handles, sponges, mops, vacuum cleaner bags, insulators, plastic film, indoor and outdoor furniture, tubing, insulation for wire and cable, plumbing supplies and fixtures, siding for housing, liners, non-woven fabrics, kitchen and bathroom hardware, appliances and equipment, countertops not including kitchen countertops or any other food-contact countertops*, sinks, flooring, floor covering, tiles, dishes, conveyer belts, footwear including boots, tools, communication equipment, personal grooming equipment, personal cards, sports and exercise equipment, and wheels.

*Note: Allowable countertop use includes, for example, countertops in bathrooms, dressing areas or garage work-bench areas in private residences, and customer-service countertops in non-food commercial establishments, but does not include countertops in fast-food restaurants or countertops in food processing areas of food manufacturing facilities.

2) Fibers

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Resins: Including acetate, polyester ("Dacron," PET, and PTT), polyelefins, polyethylene, polypropylene, polyamides including "Nylon," acrylics, viscose, polyurethane, and "Rayon," polyvinyl alcohol, polyvinyl chloride, polyvinylidene chloride, polysaccharide, and copolymers and blends thereof.

Applications: This product may not be used for any applications involving food contact, food packaging, or human drinking water. Applications including:

Home furnishings: Mattress cover pads and filling, pillow covers, sheets, blankets, fiberfill for quilts and pillows, curtains and draperies, carpet and carpet underlay, rugs, upholstery, table cloths, napkins, wiping cloths, towels, bags, wallcovering fabrics, cushion pads, sleeping bags, and brush bristles.

Transportation: Automotive and truck upholstery, carpeting, rear decks, trunk liners, convertible tops and interior liners.

Apparel: Umbrellas, outerwear, trim for outerwear, innerliners for jackets, coats, uniforms, shoes, gloves, helmets, caps, aprons, sportswear, sleepwear, stockings, socks, hosiery, and undergarments.

Industrial and household items: Brush bristles, artificial leather, filters, book covers, mops, cloth for sails, ropes, tents and other outdoor equipment, tarps, and awnings.

ACCEPTED with COMMENTS in EPA Letter Dated:	- / I I J J I I I I	,
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3) <u>Coatings</u>

Resins: Including alkyds, amino resins (melamine formaldehyde and urea formaldehyde) polyester (unsaturated polyester, PET, PBT, and PEN), polyamide (Nylon), polyimide, polypropylene (PP), polyethylene (PE), polybutylene, polymethylpentene (PMP), polysiloxane, polyvinyl alcohol (PVOH), polyvinylacetate (PVA), ethylene-vinylacetate (EVA), polyethylene copolymer, polyvinyl chloride (PVC, including plastisol), polyvinylidene chloride (PBDC), epoxy, phenolic, polycarbonate, cellulosics, cellulose acetate, polystyrene, polyurethane, acrylic, polymethyl methacrylate, acrylonitrile-butadiene-styrene copolymer (ABS), acrylonitrile-stylrene-acrylic copolymer (ASA), acetals, polyketones, polyphenylene ether, polyphenylene sulfide, polyphenylene oxide, polysulfones, liquid crystal polymers and fluoropolymers, thermo plastic elastomers, rubbers (including styrene butadiene rubber, acrylonitrile butadiene rubber, CR), polyacetal (polyoxymethylene), and blends and copolymers thereof.

Types of coatings: water-borne, solvent-borne, 100% solids, radiation cure, and liquid and powder coatings.

Applications: This product may not be used for any applications involving food contact, food packaging, or human drinking water. Applications including walls, wallboard, floors, concrete, siding, roofing shingles, industrial equipment, natural and synthetic fibers and fabrics, furniture, automotive and vehicular parts, packaging, paper products (wall coverings, towels, book covers), barrier fabrics, glazing for cement tile and for vitreous china used in plumbing fixtures such as toilets, sinks, and countertops not including kitchen countertops or any other food-contact countertops*, communication equipment, personal grooming equipment, personal cards, sports and exercise equipment, and wheels.

*Note: Allowable countertop use includes, for example, countertops in bathrooms, dressing areas or garage work-bench areas in private residences, and customer-service countertops in non-food commercial establishments, but does not include countertops in fast-food restaurants or countertops in food processing areas of food manufacturing facilities.

4) Adhesives and sealants

Resins: Including alkyds, amino resins (melamine formaldehyde and urea formaldehyde) polyester (unsaturated polyester, PET, PBT, and PEN), polyamide (Nylon), polyimide, polypropylene (PP), polyethylene (PE), polybutylene, polymethylpentene (PMP), polysiloxane, polyvinyl alcohol (PVOH), polyvinylacetate (PVA), ethylene-vinylacetate (EVA), polyethylene copolymer, polyvinyl chloride (PVC, including plastisol), polyvinylidene chloride (PBDC), epoxy, phenolic, polycarbonate, cellulosics, cellulose acetate, polystyrene, polyurethane, acrylics, cyanoacrylates, polymethyl methacrylate, acrylonitrile-butadiene-styrene copolymer (ABS), acrylonitrile-stylrene-acrylic copolymer (ASA), acetals, polyketones, polyphenylene ether, polyphenylene sulfide, polyphenylene oxide, polysulfones, liquid crystal polymers and fluoropolymers, thermo plastic elastomers, rubbers (including styrene butadiene rubber, acrylonitrile butadiene rubber, CR), polyacetal (polyoxymethylene), and blends and copolymers thereof.

Methods of application: hot-melt, aqueous, solvent borne, 100% solids, radiation cure.

Applications: This product may not be used for any applications involving food contact, food packaging, or human drinking water. Applications including adhesives used in the manufacture of wood and plastic composites, adhesives for ceramic tile, wood, paper, cardboard, rubber and plastic, glazing for windows, grout, and sealants for pipes, adhesives, sealants and insulating materials for appliances, bathrooms, showers, kitchens, and construction.

5) <u>Miscellaneous applications</u>

Materials: Clay, china, ceramics, concrete, sand, and grout.

Applications: This product may not be used for any applications involving food contact, food packaging, or human drinking water. Applications including toilets, sinks, tile, flooring, stucco, plaster, cat litter, drainage and sewerage pipe.

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STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PROHIBITIONS: Do not store in areas accessible to children. Do not store in places where food or feed may come in contact with the product. Keep away from direct sunlight.

DISPOSAL: Unused material should be disposed of on site or an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration, if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

E. I. du Pont de Nemours & Company, Inc. DuPont Specialty Chemicals Chambers Works, JL 4210 Deep Water, NJ 08023

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