UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

JUL 11 1986

MEMORANDUM

SUBJECT: Amended Registration - Technical Bulletin
EPA Registration No. 34292-3 (Dow Corning
Sylgard Antimicrobial Treatment 42% ai in
50% methanol) - Amended Statement of Use

Caswell No. 892B

FROM: Henry Spencer, Ph.D. 7/7/86
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Toxicology Branch
Hazard Evaluation Division (TS-769C)

TO: John Lee, PM 31
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THRU: Albin Kocialski, Ph.D., Supervisory Pharmacologist
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Background:

In the original registration of Sylgard, EPA Registration No. 34292-3, the product was used by application in water.

Comment:

In the present amendment, the registrant is claiming that Sylgard can be applied as represented in the following excerpt from the submission.

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How To Use:

SYLGARD® Antimicrobial Treatment can be applied to organic or inorganic substrates in an appropriate solvent such as water, alcohols, ketones, esters, hydrocarbons, and chlorinated hydrocarbons. These substrates can be treated by brushing, dipping, padding, soaking, spraying, fogging, or by using foam finishing techniques.

After applying the antimicrobial treatment, the surface should then be allowed to dry.

The Toxicology Branch (TB) has no objections as to how the registrant finds the product is able to be applied. However, TB does object to the statement that Sylgard may be applied in any of the solvents listed in the excerpt without at least the very minimum toxicity testing, as would be indicated by the use/use pattern/use dilution.

TB would suggest moving the "Users Please Read" statement to follow the "How to Use" statement.