

MAY 22 2003

Garrett Schifilliti
Arch Chemicals, Inc.
501 Merritt 7
Norwalk, CT 06856

Subject: Zinc Omadine 48% Dispersion Industrial Microbiostat
EPA Reg. No. 1258-841
Your Re-Submission Dated 3/3/03 (Original Amendment Dated 11/14/02)

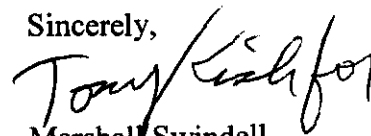
The re-submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and which responds to the EPA letter dated 2/12/03, and which makes the following changes,

- ◆ Revise the "First Aid" statements as per PR Notice 2001-1, and the "Storage & Disposal" section,
- ◆ Add an "overview" section identical with the section approved for EPA Reg. No. 1258-840,
- ◆ Correct various dosages to be in harmony with Arch's companion zinc omadine products,
- ◆ Add a new label use for indirect food contact packaging adhesives, is acceptable.

The dosages between this product and the companion products appear to be in harmony and the product formula component have been shown to be cleared in 21 CFR only for indirect food packaging adhesives. A copy of the label stamped "Accepted" is attached for your files.

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

SYMBOL								
SURNAME								
DATE								

**PRECAUTIONARY STATEMENTS:
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS. DANGER**

Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Wear goggles and face shield and rubber gloves when handling. Do not breathe spray mists. Wash thoroughly after handling with soap and water, and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

If Swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If Inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IN CASE OF EMERGENCY CALL

1-800-854-6911

**ZINC OMADINE® 48%
DISPERSION INDUSTRIAL
MICROBIOSTAT**

Active Ingredient:	
Zinc, 2-pyridinethiol-1-oxide	48%
Inert Ingredients:	52%
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See Side Panel For First Aid And Precautions

Net Wt 25 Lbs.

ARCH CHEMICALS, INC.
501 MERRITT SEVEN
NORWALK, CT 06856

EPA Reg. No. 1258-841
EPA Est. No. 1258-NY-3

Omadine® is a registered trademark of Arch Chemicals, Inc.

CHEMICAL HAZARDS

Do not store or mix with strong oxidizing agents or strong (concentrated) acids. In case of contamination do not reseal container. If possible, isolate container in open or well-ventilated area. Fumes caused by contamination may be hazardous.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 22 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
1258-841

ENVIRONMENTAL HAZARD

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans or public waters unless in accordance with the requirements of a 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 our State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not freeze. Store above 50°F. Keep container tightly closed when not in use. Do not store with strong oxidizing agents or strong (concentrated) acids.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticides, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Do not reuse empty container.

CONTAINER DISPOSAL:

Metal Containers: Triple rinse. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. **Plastic Containers:** Triple rinse. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

2
2
4

DIRECTIONS FOR USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling. We recommend that users contact Arch Chemicals Technical Service for formulation assistance.

Overview: A minimum cost effective use level recommendation can only be established through testing of a specific formulation intended for use in a specific application. Formulations differ in their composition and as a result, of their susceptibility to microbial attack. Conditions of use and the performance expectations differ from product to product. A warranted high performance preserved product, for example, that is under consideration for use in severe tropical environments, is likely to need a high dose of biocide. Testing at biocide use levels would be recommended at 3000, 4000 and 5000 ppm. As the product adds cost to the formulation and as performance requirements need to be met, laboratory and field tests are conducted to establish the antimicrobial performance of this product. An unwarranted preserved product that is not intended for use in severe environments would likely need a lower dose. Again, a recommendation would be made for testing at lower concentrations based on formulation, performance and cost considerations.

DRY FILM PRESERVATION: THIS PRODUCT PROTECTS THE APPLIED DRY FILM ITSELF AND DOES NOT PROTECT THE UNDERLYING SURFACE FROM ATTACK BY ALGAE, FUNGI, MILDEW OR BACTERIA.

For the Dry Film Preservation of Flooring Adhesives, Caulks, Sealants, Grouts and Patching Compounds:

Flooring Adhesives: For fungal control add 1500 ppm of this product and for bacterial control add 4800 ppm. (Add 1.5 lbs. of this product to 1000 lbs. of adhesive to control fungus and add 4.8 lbs. per 1000 lbs. of adhesive to control bacteria.)

Caulks/Sealants: For fungal control add 4100 ppm of this product and for bacterial control add 10000 ppm of this product. (Add 4.1 lbs. of this product per 1000 lbs. of caulk/sealant to control fungus, add 10 lbs. of this product to control bacteria.)

Grouts/Patching Compounds: For fungal control add 2000 ppm of this product and for bacterial control add 8000 ppm of this product. (Add 2 lb. of this product to 1000 lbs. of grouts/patching compounds to control fungus and 8 lbs. of this product to control bacteria.)

For the Dry Film Preservation of Aqueous Latex and Other Types of Architectural and Industrial Non-Marine Paints and Coatings: Addition of up to 10000 ppm of this product can inhibit the growth of algae, bacterial slime, mildew, and other fungi. It can be added at any time during the formulation procedure. For example, the dry film of a house paint having a density of 10 lbs. per gallon can be protected against the growth of algae, bacterial slime, mildew and other fungi by the addition of 10000 ppm of this product. (Add 10 lbs. of this product to 100 gallons of wet paint.)

For the Dry Film Preservation of Residential Latex Paints Against Fungus or Algae: Use a minimum of 5000 ppm of this product. For maximum protection against the growth of fungus or algae, use 10,000 ppm of this product. For control of bacterial growth on the dry paint film surface, use 5000 ppm of this product. (Add a minimum of 5 lbs. of this product to 100 gallons of wet paint, with a density of 10 lbs per gallon, to control fungus or algae. Add a maximum of 10.0 lbs. of this product to 100 gallons.)

For the Dry Film Preservation of Joint Compounds, Glazing Compounds and Wood Fillers: Addition of up to 10000 ppm (10.0 lbs. of this product per 1000 lbs. of formulation) of this product will inhibit microbial growth (bacteria and fungi) in the dry film of these products. This product can be added at any time during the formulation procedure.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 22 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
1252-841

3
2
4

For the Control of Mildew and Bacteria In Styrene Butadiene Rubber and Thermoplastic Resins Used In the Manufacture of the Following Products: Carpet Fibers; Carpet Backings; Rubber or Rubber Backed Bath Mats; Foam Underlay For Carpets; Synthetic, Non-Leather Materials; Foam Stuffing for Cushions and Mattresses; Wire and Cable Insulation; Vinyl, Linoleum and Synthetic Floor Coverings; Wall Coverings; Plastic Furniture; Athletic Flooring and Mats; Mattress Liners, Covers or Ticking; Molding; Mats; Gaskets; Weather Stripping; Coated Fabrics For Furniture Cushions, Boat Covers, Tents; Tarpaulins; Awnings; Non-Surgical Rubber Gloves; Garbage Bags, Refuse Containers; Bathtub Appliques; Garden Hose; Non-Potable Water Pipe; Ductwork for industrial, hospital, residential, and commercial heating and cooling; Shower Curtains; Sponge or Fiber Mops; Household Use Sponges; Toilet Brush Receptacles, Toothbrush Receptacles (Non Bristle Contact); Non-Medical Scrub Brushes; Sink Mats and Drain Boards; Storage Containers; Soap Dish Holders; Towel Bars and Components of Footwear.

Addition of up to 8000 ppm (8 lbs./1000 lbs. of formulation) of this product can inhibit the growth of mildew & bacteria in styrene butadiene rubber & thermoplastic resins such as vinyl chloride-vinyl acetate copolymers, polyurethanes, polyamides, polyolefins, polystyrene, polyesters and acrylonitrile copolymers. It can be added at a time during the formulation procedure that will insure uniform distribution throughout the polymer system. Add by pouring or by use of metering equipment. For example, to inhibit mildew growth in polyurethane footwear components, add 4000 ppm (4 lbs./1000 lbs. of formulation) of this product to the polyurethane formulation.

For the In Can Preservation of Latex Emulsions, Clay, Mineral, Pigment and Guar Gum Slurries Used In the Manufacture of Adhesives, Caulks, Patching Compounds, Sealants and Grouts: A dosage of up to 10,000 ppm is recommended to control bacteria and fungi. This dosage is equivalent to 10 lbs. of this product per 1000 lbs. of slurry. It may be added at any time during the formulation procedure.

To Inhibit the Growth of Bacteria and Fungi In Dry Wall and Gypsum, Pearlite, Plaster-Like or Mineral Based Building Materials Used In the Manufacture of Ceilings, Ceiling Tile, Walls and Partitions: Addition of up to 8000 ppm of this product (8 lbs. of product per 1000 lbs. of the formulation, i.e., wet slurry) will inhibit the growth of bacterial and fungi. It can be added at any time during the formulation procedure. Alternatively the product may be added to latex or other types of coating systems routinely applied to the surfaces of walls, ceiling tiles, partitions, etc. at the same dosage as above.

To Inhibit Bacterial and Fungal Growth On Laundered Fabrics: Fabrics to be treated include nylon, polypropylene, polyethylene, polyesters, cellulose and blends of these polymers. At a sour density of 8.3 pounds per gallon, add 6-18 ounces of this product per 1000 lbs dry weight of fabric to reach a use level of 38-112 ppm. Apply to the sour operation and run for a minimum of five minutes. Product is to be used in industrial applications. Product is not intended for use in residential, commercial or institutional settings.

INDIRECT FOOD CONTACT USES:

To Control Growth of Bacteria and Fungi In Adhesives Used For Food Packaging:

For food packaging adhesives, at use temperatures up to 120°F, and subject to Good Manufacturing Practices, including the conditions specified in 21 CFR 175.105 (a) and (b), add a dosage of 1500 ppm to a maximum of 2000 ppm of this product (1.5 to 2.0 lb. of this product per 1000 lbs. of food packaging adhesive) at a point where thorough mixing will take place.

(zpt 48 label proposed to epa 3 3 2003.doc)

2011

44

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 22 2003

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

1258-841

4243