

DEC 08 2004

Garrett Schifilliti  
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Norwalk, CT 06856

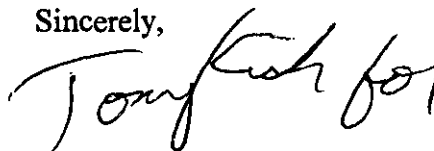
**Subject:**     **Zinc Pyrithione RED Required Label Amendments, All Dated 11/24/04**  
                 **Zinc Omadine Powder Industrial Microbiostat; EPA Reg. No. 1258-840**  
                 **Zinc Omadine 48% Dispersion Industrial Microbiostat; EPA Reg. No. 1258-841**  
                 **Zinc Omadine PVC Industrial Fungicide; EPA Reg. No. 1258-1183**  
                 **Zinc Omadine Powder AF; EPA Reg. No. 1258-1223**  
                 **Zinc Omadine 48% Aqueous Dispersion AF; EPA Reg. No. 1258-1224 ✓**  
                 **Zinc Omadine ZOE Dispersion Mildewcide; EPA Reg. No. 1258-1235**  
                 **Vanquish SL 10 Antimicrobial; EPA Reg. No. 1258-1285**

The seven amendments referred to above, submitted in connection with re-registration under the Federal Insecticide, Fungicide, and Rodenticide Act), as amended, which provide revised labels with interim label changes as required by the Zinc Pyrithione Red decision memo dated 9/30/04, and further specified in the EPA letter dated 11/4/04 to each registrant with zinc pyrithione products, are acceptable. The products listed above must have the accepted label changes on them the earlier of the next product production cycle, or the next boat painting season in 2005. EPA Reg. No. 1258-1257 (Proxel BZ Preservative) does not require the specified inhalation statement because the inhalation MOE's are acceptable.

Copies of labels stamped "Accepted" are enclosed for your records.

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)

**PRECAUTIONARY STATEMENTS:**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS. DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Do not breathe spray mists. Users must wear protective eyewear (goggles, safety glasses, or face shield), long sleeved shirt and long pants, socks, chemical resistant gloves and chemical resistant footwear. Users must wear a fit tested, NIOSH approved full face respirator equipped with a combination organic vapor/P-100 prefilter. When mixing and loading, or cleaning equipment, wear a chemical resistant apron. 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**  
1-800-654-6911

**ZINC OMADINE® 48%  
AQUEOUS DISPERSION  
AF**

**Active Ingredient:**

**Zinc 2-pyridinethiol-1-oxide 48%**

**Inert Ingredients 52%**

**Total 100%**

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**SEE SIDE LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS**

**Net Wt 25 Lbs**

**Arch Chemicals Inc.  
501 MERRITT 7  
NORWALK, CT 06856**

**EPA Reg. No. 1258-1224  
EPA Est. No. 1258-NY-3**

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

**ENVIRONMENTAL HAZARD:** This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans or other 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 your State Water Board Regional Office of the EPA.

**CHEMICAL HAZARDS.** Do not store 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.

**STORAGE AND DISPOSAL:** Do not freeze.

Store above 50 degrees F. Keep container tightly closed when not in use. Do not store with strong oxidizing agents. 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.

**Container Disposal:** Do not reuse empty container.

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.

Before discarding, securely wrap container in several layers of newspaper and discard in trash.

**DIRECTIONS FOR USE:** It is a violation of federal law to use this product in a manner inconsistent with its labeling.

For use only for formulation of antifoulant paints.

Do not use for formulating antifoulant end use paints intended for application by residential (non-commercial) users involving; airless spray, applications of more than one coat within 24 hours, applications in closed or partially closed environments such as garages and tarped enclosures, etc., and containing more than 4.8% zinc pyrrithione by weight. Formulators using this product are responsible for obtaining EPA registration of their formulated product.

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated:**

(RED ZPT 48 AF label 1104.doc)

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Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No.  
1258-1224