

DEC 08 2004

Garrett Schifilliti  
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Norwalk, CT 06856

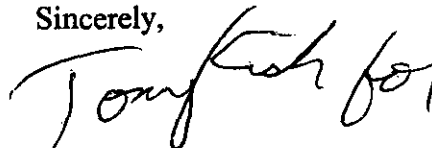
**Subject: Zinc Pyrithione RED Required Label Amendments, All Dated 11/24/04**  
**Zinc Omadine Powder Industrial Microbiostat; EPA Reg. No. 1258-840**  
**Zinc Omadine 48% Dispersion Industrial Microbiostat; EPA Reg. No. 1258-841**  
**Zinc Omadine PVC Industrial Fungicide; EPA Reg. No.1258-1183**  
**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. May be fatal if swallowed. Harmful if absorbed through skin or inhaled. Do not get in eyes, on skin, or on clothing. Avoid breathing vapor or spray mist. 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® ZOE  
DISPERSION MILDEWCIDE**

Active Ingredient: • • • • •  
Zinc, 2-pyridinethiol-1-oxide 37.6%  
Inert Ingredients: 62.4%  
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. 1258-1235  
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.

**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:** Store above 50°F. Do not allow freezing. 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.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

(RED ZOE 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.

1258-1235

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**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.

Do not use for any application involving direct or indirect contact with food or drinking water.

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 1900 ppm of this product and for bacterial control add 6100 ppm of this product. (Add 1.9 lbs. of this product to 1000 lbs. of adhesive to control fungus and add 6.1 lbs. per 1000 lbs. of adhesive to control bacteria.)

Caulks/Sealants: For fungal control add 5300 ppm of this product and for bacterial control add 12760 ppm of this product. (Add 5.3 lbs. of this product per 1000 lbs. of caulk/sealant to control fungus, add 12.76 lbs. of this product to control bacteria.)

Grouts/Patching Compounds: For fungal control add 2550 ppm of this product and for bacterial control add 10100 ppm of this product. (Add 2.55 lb. of this product to 1000 lbs. of grouts/patching compounds to control fungus and 10.1 lbs./1000 lb. 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 12760 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 12760 ppm of this product. (Add 12.76 lbs. of this product to 100 gallons of wet paint.)

**For the Dry Film Preservation of Residential Latex & Other Paints Against Fungus or Algae:** Use a minimum of 6400 ppm of this product. For maximum protection against the growth of fungus or algae, use 12760 ppm of this product. For control of bacterial growth on the dry paint film surface, use 6400 ppm of this product. (Add a minimum of 6.4 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 12.76 lbs. of this product to 100 gallons.)

**(For Unit-Dose Packages of 10.4 ml & 49.4 ml unit-dose packets)**

**For the Dry Film Preservation of Residential Latex & Other Paints Against Fungus or Algae in interior/low humidity conditions:** For each gallon of paint with a density of about 10#/gal., use one 10.4 ml packet (0.35 fl oz, 13 grams) which provides a dosage of 3000 ppm of this product. For more severe conditions of exposure to weather or humidity, use 2 packets (which provides a dosage of 6000 ppm of this product).

For each 5 gallons of paint, use one 49.4 ml packet (1.66 fl oz, 62 grams) which provides 2800 ppm of this product. For more severe conditions of exposure to weather or humidity, use 2 packets (which provides a dosage of 5600 ppm of this product).

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**For the Dry Film Preservation of Joint Compounds, Glazing Compounds and Wood Fillers:** Addition of up to 12760 ppm (12.76 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

**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, air filtration components and air filtration media for industrial, hospital, residential, and commercial heating and cooling; Conveyor belts; Shower Curtains; Sponge or Fiber Mops; Toilet Brush Receptacles (Non Bristle Contact); Non-Medical Scrub Brushes; Sink Mats and Drain Boards; Storage Containers; Soap Dish Holders; Towel Bars and Components of Uppers In Footwear.

Addition of up to 10100 ppm (10.1 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 5100 ppm (5.1 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 12760 ppm of this product is recommended to control bacteria and fungi. This dosage is equivalent to 12.76 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 10100 ppm of this product (10.1 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.

**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 8 – 23 ounces of this product per 1000 lbs. dry weight of fabric to reach a use level of 48 to 142 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.

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