

NOV 2 2005

Arch Chemicals, Inc.
1955 Lake Park Drive
Smyrna, GA 30080

Attn: Mark Burt
Regulatory Manager

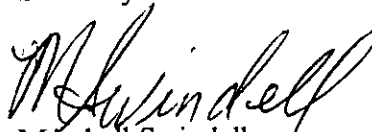
Subject: Vanquish 100 Antimicrobial
EPA File Symbol 1258-1249
Your Notification Dated September 30, 2005

This will acknowledge receipt of your notification to add the following indoor non-food use sites "sealers, coatings, sink drain mats, rubber or plastic coated wire shelving and dish drainer, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification dated September 30, 2005 is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely



Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

33
Arch Chemicals, Inc.

1955 Lake Park Drive
Suite 100
Smyrna, GA 30080
Tel: 770.801.6600

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Via UPS

September 30, 2005

Mr. Marshall Swindell
Product Manager 33
Office of Pesticide Programs (7504C)
C/O Document Processing Desk (NOTIF)
U.S. Environmental Protection Agency
Room 266 A
Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Subject: Vanquish 100 Antimicrobial
EPA Reg. No. 1258-1249
- Notification

Dear Mr. Swindell:



Arch Chemicals, Inc. would like to add certain indoor non-food use sites to the Vanquish 100 Antimicrobial label. These use sites are: sealers, coatings, sink drain mats, rubber or plastic coated wire shelving and dish drainers.

We believe that these changes can be accomplished by notification. In support of this notification, enclosed is a completed notification form (EPA Form 8570-1), two copies of the product labeling with the additions highlighted in yellow, and a PR Notice 98-10 Certification Statement. Thank you for your cooperation. Please contact me at the above address, by phone at 770-803-2526, or by e-mail at meburt@archchemicals.com if there are any questions.

Sincerely,

Mark E. Burt, Ph.D.
Regulatory Manager

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		United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I					
1. Company/Product Number 1258-1249		2. EPA Product Manager Marshall Swindell		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) Vanquish 100 Antimicrobial		PM# 33			
5. Name and Address of Applicant (Include ZIP Code) Arch Chemicals, Inc. 1955 Lake Park Drive Smyrna, GA 30080 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____			
Section - II					
<input type="checkbox"/> Amendment - Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____			
<input type="checkbox"/> Resubmission in response to Agency letter dated _____		<input type="checkbox"/> "Me Too" Application.			
<input checked="" type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Notification to: add the following indoor non-food use sites to the Vanquish 100 label - sealers, coatings, sink drain mats, rubber or plastic coated wire shelving and dish drainers.					
Section - III					
1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted					
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			
Section - IV					
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Mark E. Burt		Title Regulatory Manager		Telephone No. (Include Area Code) (770) 803-2526	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamp)
2. Signature 		3. Title Regulatory Manager			
4. Typed Name Mark E. Burt		5. Date September 30, 2005			

PR Notice 98-10 Certification Statement

Product: Vanquish 100 Antimicrobial

EPA Reg. No.: 1258-1249

Registrant: Arch Chemicals, Inc.

Notification to: add the following indoor non-food use sites to the Vanquish 100 label - sealers, coatings, sink drain mats, rubber or plastic coated wire shelving and dish drainers.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Company Agent: M.E. Burt

Title: Regulatory Manager

Date: September 30, 2005

Signature: 

(Center Panel)

VANQUISH 100

Antimicrobial

FOR DIRECT INCORPORATION INTO PLASTIC AND RUBBER FOR FURTHER PROCESSING

ACTIVE INGREDIENT:

N-BUTYL-1, 2-BENZISOTHIAZOLIN-3-ONE:..... 94.5%

INERT INGREDIENTS:.....5.5%

TOTAL INGREDIENTS:.....100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

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. CALL A POISON CONTROL CENTER OR DOCTOR FOR TREATMENT ADVICE.

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 BY A POISON CONTROL CENTER OR DOCTOR.

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.

IF INHALED: MOVE PERSON TO FRESH AIR. IF PERSON IS NOT BREATHING, CALL 911 OR AN AMBULANCE, AND THEN GIVE ARTIFICIAL RESPIRATION, PREFERABLY MOUTH-TO-MOUTH, IF POSSIBLE. CALL A POISON CONTROL CENTER OR DOCTOR FOR FURTHER TREATMENT ADVICE.

FOR ADDITIONAL INFORMATION IN CASE OF EMERGENCY CALL TOLL FREE 1-800-654-6911. HAVE THE PRODUCT CONTAINER OR LABEL WITH YOU WHEN CALLING A POISON CONTROL CENTER OR DOCTOR OR GOING TO TREATMENT.

NOTE TO PHYSICIAN

PROBABLE MUCOSAL DAMAGE MAY CONTRAINDICATE THE USE OF GASTRIC LAVAGE FOLLOWING INGESTION.

**SEE ADDITIONAL PRECAUTIONARY
STATEMENTS ON SIDE PANEL**

MANUFACTURED BY:

CONTENTS:

55 LBS. NET MINIMUM (25 kg)

**Arch Chemicals, Inc.
501 Merritt 7
Norwalk, CT 06856**

(APPROX 7 U.S. GALLONS)
MADE IN: UK

EPA REG. NO. 1258-1249
EPA EST. NO. 74637-GBR-001

LOT NUMBER: SEE ATTACHED LABEL
PRODUCT CODE 06239

Vanquish is a Registered Trademark of Arch UK Biocides LTD.

LABEL REF: EPAV10025



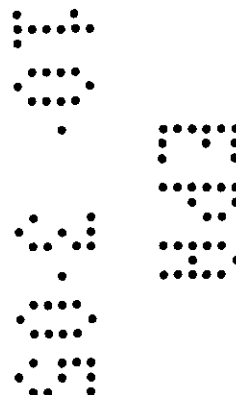
(Left Panel)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE AND SKIN BURNS. HARMFUL IF SWALLOWED OR ABSORBED THROUGH SKIN OR INHALED. DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING. DO NOT BREATHE SPRAY MIST. WEAR GOGGLES OR FACE SHIELD AND RUBBER GLOVES WHEN HANDLING. MAY BE FATAL IF INHALED. DO NOT BREATHE VAPORS. USE WITH ADEQUATE VENTILATION. IF NEEDED, USE NIOSH CERTIFIED RESPIRATOR FOR ORGANIC VAPORS, MISTS AND FUMES. WASH THOROUGHLY AFTER HANDLING AND BEFORE EATING, DRINKING OR USING TOBACCO. REMOVE CONTAMINATED CLOTHING AND WASH BEFORE REUSE.

ENVIRONMENTAL HAZARDS: THIS PRODUCT IS TOXIC TO FISH. DO NOT DISCHARGE EFFLUENT CONTAINING THIS PRODUCT INTO LAKES, STREAMS, PONDS, 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 OR REGIONAL OFFICE OF THE EPA. DO NOT CONTAMINATE WATER BY CLEANING OF EQUIPMENT OR DISPOSAL OF WASTES



(Right Panel)

DIRECTIONS FOR USE

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

Many plastics are considered to be resistant to microbial attack, but there are significant exceptions that merit preventative action by the use of antimicrobial additive. Plasticized PVC, polyurethane and silicones are particularly susceptible. The biodeterioration of products based on these types of plastics can be a serious problem for manufacturers. Failure to add the proper amount of antimicrobial additive can lead to premature product failure due to loss of mechanical strength, flexibility or adhesive strength. Also, adverse aesthetic problems such as musty odor, permanent staining or microbial surface growth can lead to customer complaints.

Vanquish 100 Antimicrobial is effective against the microbes which degrade plastics (and plastic additives) or natural rubber and can increase the useful life of articles made from these materials.

Vanquish 100 Antimicrobial additive is effective in most plastic compositions and can be used to preserve natural rubber and such plastics as PVC, polyurethane, silicone, acrylics, and others to produce articles such as;

- coated fabric (e.g. ski wear, raincoats, tents, seat covers)
- floor coverings, underlay & mats
- vinyl wall coverings
- tarpaulins and awnings
- roofing membranes
- synthetic leather (e.g. sneakers and training shoe uppers)
- swimming pool liners, ornamental pond liners
- appliance gaskets (e.g. washers, refrigerator)
- shoe soles, mid-soles & outers
- sealants, ~~sealers~~, ~~coatings~~, caulks, weather stripping & non-food contact adhesives
- pet toys & general household items
- (shower curtains, bath mats, sink drain mats, rubber or plastic coated wire shelving and dish drainers)
- auto parts (e.g. landau tops, door seals, shock absorbers)
- foam (e.g. seat cushions, gaskets, insulation)
- tubing (e.g., marine hose and sleeving)
- electrical & pipe wrap
- furniture (e.g. outdoor, leisure, water bed liners, cushions)

Do not use this product to treat food/feed or drinking water contact items or toys.

Vanquish 100 Antimicrobial additive has been found to be an effective polymer preservative at concentrations of 0.03% to 1.0% based on the total weight of the substrate. Typical range of concentrations on which trials can be based, are:

<u>Application</u>	% VANQUISH 100 Antimicrobial (based on total weight of final product)
Plasticized PVC	0.03 to 0.5
Polyurethane	0.05 to 0.5
Silicones	0.05 to 1.0
Polyesters	0.05 to 1.0
Polyolefins	0.05 to 1.0
Acrylics	0.05 to 1.0
Synthetic elastomers such as butadiene-styrene, styrene-isoprene and acrylonitrile-butadiene-styrene	0.03 to 1.0
Natural latex rubber	0.03 to 0.5

The concentration required to give protection depends on several factors. These include the susceptibility of the system to microbiological degradation, the extent to which micro-organisms can gain access, the species involved, pH, temperature, moisture and length of time for which protection is required.

INCORPORATION OF VANQUISH 100 ANTIMICROBIAL INTO POLYMERS

PVC plastisols: For addition to PVC plastisols Vanquish 100 Antimicrobial liquid may be added along with the other additives. Use levels should be calculated based upon the total weight of the formulation.

Cross Linked Polyurethane: For addition to cross linked polyurethane Vanquish 100 Antimicrobial liquid should be added to the polyol at a concentration that will yield the desired use level in the final product after reaction with the isocyanate component. Vanquish 100 Antimicrobial may also be incorporated at an injection port of a reaction injection molding (RIM) machine.

Melt Processed Polymers: For addition to melt processed polymers (PVC, thermoplastic polyurethane, synthetic elastomers and thermoplastic acrylics etc.) Vanquish 100 Antimicrobial liquid may be metered into the melt to yield the desired end use concentration. For example at the injection point in an extrusion system. Alternatively, Vanquish 100 Antimicrobial liquid may be made into a concentrated chip (as above at up to 20% Vanquish 100 Antimicrobial) and these chips blended with non preserved chips in the users plant to yield the desired end use concentration upon subsequent melt processing. For thermoplastic polyurethane, concentrated granules may also be produced by absorbing Vanquish 100 Antimicrobial liquid to granules through shear mixing (up to 20% Vanquish 100 Antimicrobial). These can be blended with non preserved polymer chips in the users plant to the desired use concentration and then further heat processed (i.e. via extrusion).

PVC: Vanquish 100 Antimicrobial liquid may be added to the mixed liquid components added to a blend of PVC resin and solids, shear mixed until a dry blend is achieved and then processed through extrusion, calendering, molding or other system.

Acrylics: In addition to the above, Vanquish 100 Antimicrobial liquid can be added to the liquid monomers before polymerization, at levels to yield the desired use level in the final product after polymerization.

Silicone: For silicone sealants, the Vanquish 100 Antimicrobial liquid may be added to the silicone oil before processing, or to the manufacturing vessel before packing off.

Natural Rubber: Vanquish 100 Antimicrobial can be added to the latex.

The Arch Technical Service Group can provide additional guidance on the proper use of Vanquish 100 Antimicrobial.

STORAGE AND DISPOSAL: DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL. OPEN DUMPING IS PROHIBITED.

PESTICIDE STORAGE: PROTECT FROM FROST. IF FROZEN, ALLOW TO THAW AND STIR WELL BEFORE USE.

PESTICIDE DISPOSAL: PESTICIDE WASTES ARE ACUTELY HAZARDOUS. IMPROPER DISPOSAL OF EXCESS PESTICIDE 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.

CONTAINER DISPOSAL: TRIPLE RINSE (OR EQUIVALENT). 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.

