

1258-1251

09/13/2005

1/5

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 13 2005

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

Attn: Mark Burt  
Regulatory Manager

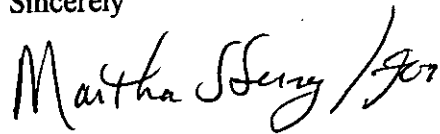
Subject: Vanquish DOP  
EPA File Symbol 1258-1251  
Your Notification Dated August 30, 2005

This will acknowledge receipt of your notification to correct a typographical errors: add the word "advice" to "if on skin or clothing" first aid statement; remove the apostrophe from the word polyurethanes in the directions for use section; change the phrase "Vanquish Phthalate" to read "Vanquish DOP", 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 August 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								

OFFICIAL FILE COPY

37

**Arch Chemicals, Inc.**

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

2/5



Via UPS

August 29, 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 DOP  
EPA Reg. No. 1258-1251  
- Notification

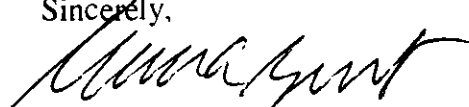
Dear Mr. Swindell:

Arch Chemicals, Inc. would like to correct the following label typographical errors: add the word "advice" to "if on skin or clothing" first aid statement; remove the apostrophe from the word polyurethanes in the directions for use section; change the phrase "Vanquish Phthalate" to read "Vanquish DOP".

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 corrected areas 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](mailto:meburt@archchemicals.com) if there are any questions.

Sincerely,

  
Mark E. Burt, Ph.D.  
Regulatory Manager



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

3/5

 <b>EPA</b>	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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### Application for Pesticide - Section I

1. Company/Product Number 1258-1251	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Vaquish DOP	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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification to: correct the following label typographical errors: add the word "advice" to "if on skin or clothing" first aid statement; remove the apostrophe from the word polyurethanes in the directions for use section; change the phrase "Vanquish Phthalate" to read "Vanquish DOP".

### Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt    No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
<b>Certification must be submitted</b>					
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	
<b>Certification</b> 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 (Stamped)
2. Signature 	3. Title Mark E. Burt		
4. Typed Name Mark E. Burt	5. Date August 29, 2005		

## PR Notice 98-10 Certification Statement

Product: Vanquish DOP

EPA Reg. No.: 1258-1251

Registrant: Arch Chemicals, Inc.

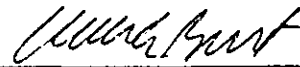
Notification to: to correct the following label typographical errors: add the word "advice" to "if on skin or clothing" first aid statement; remove the apostrophe from the word polyurethanes in the directions for use section; change the phrase "Vanquish Phthalate" to read "Vanquish DOP".

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: August 29, 2005

Signature: 

# VANQUISH® DOP Antimic. Jbial

AN ANTIMICROBIAL IN PLASTICIZER FOR USE  
IN THE PRESERVATION OF PLASTICS AND RUBBER PRODUCTS

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS  
AND DOMESTIC ANIMALS  
WARNING

ACTIVE INGREDIENT:  
N-BUTYL-1,2-BENZISOTHAZOLIN-3-ONE.....9.5%  
INERT INGREDIENTS.....90.5%  
TOTAL.....100.0%

KEEP OUT OF REACH OF CHILDREN.

## WARNING

### 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 FIVE MINUTES, THEN CONTINUE RINSING EYE. 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 DO SO 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 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.

Medical Emergency Information Center  
1-800-654-6911

HAVE THE PRODUCT CONTAINER OR LABEL WITH YOU WHEN CALLING A POISON CONTROL CENTER OR DOCTOR, OR GOING FOR TREATMENT.

NOTE TO PHYSICIAN: PROBABLE MUCOSAL DAMAGE MAY CONTRAINDICATE THE USE OF GASTRIC LAVAGE FOLLOWING INGESTION.

SEE ADDITIONAL PRECAUTIONARY  
STATEMENTS ON SIDE 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, polyurethanes and silicones are particularly susceptible. The biodegradation 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 DOP Antimicrobial is effective against the microbes which degrade plastic (and plastic additives) or natural rubber and can increase the useful life of plastic articles.

VANQUISH DOP Antimicrobial additive is effective in most plastics compositions and can be used to preserve such plastics as PVC, polyurethane, silicone, acrylics, and others to produce articles such as:

shower curtains - coated fabric (e.g. ski wear, raincoats, tents) - 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 and mid-soles sealants, caulks, weather stripping & non-food contact adhesives - pet toys and general household items (shower curtains, bath mats) - auto parts (e.g. tandem 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)

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

Vanquish DOP Antimicrobial additive has been found to be an effective polymer preservative at concentrations of 0.3% to 5.0% based on the total weight of the substrate. Typical range of concentrations on which trials can be based, are:

Application	%VANQUISH DOP Antimicrobial (based on total weight of final product)
Plasticized PVC	0.3 to 6.0
Polyurethanes	0.5 to 5.0
Silicones	0.3 to 5.0
Polyesters	0.5 to 10
Acrylics	0.5 to 10
Synthetic elastomers such as butadiene-styrene styrene-isoprene and acrylonitrile-butadiene-styrene	0.3 to 10
Natural latex rubber	0.3 to 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 microorganisms can gain access, the species involved, pH, temperature, and length of time for which protection is required.

### INCORPORATION OF VANQUISH DOP ANTIMICROBIAL INTO POLYMERS

PVC plastisols: For addition to PVC plastisols Vanquish DOP 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 Polyurethanes: For addition to cross linked polyurethane Vanquish DOP 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 DOP 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 DOP 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.

PVC: Vanquish DOP 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, calendaring, molding or other system.

Acrylics: In addition to the above, Vanquish DOP Antimicrobial liquid can be added to the liquid monomers before polymerization or in the case of thermoplastic acrylic the Vanquish DOP liquid can be added by direct injection into an extruder or other blender.

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

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

The Arch Technical Service Group can provide guidance on the proper use of Vanquish 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 RE-CYCLING OR RECONDITIONING, OR PUNCTURE AND DISPOSE OF IN A SANITARY LANDFILL, OR BY OTHER PROCEDURES APPROVED BY STATE AND LOCAL AUTHORITIES.

HARMFUL IF ABSORBED THROUGH THE SKIN. DO NOT GET IN EYES. CAUSES EYE IRRITATION. AVOID CONTACT WITH SKIN. DO NOT BREATHE VAPORS. USE ADEQUATE VENTILATION. IF NEEDED, USE NIOSH CERTIFIED RESPIRATOR FOR ORGANIC VAPORS, MISTS OR FUMES. WASH THOROUGHLY AFTER HANDLING AND BEFORE EATING, DRINKING OR USING TOBACCO. REMOVE AND WASH CONTAMINATED CLOTHING BEFORE RE-USE.

### 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.

EPA REG NO. 1258-1251

EPA EST NO. 74637-GBR-001

MADE IN UK - LOT NUMBER: SEE ATTACHED LABEL

CONTENTS: 55LBS. NET MINIMUM (25kg)

(APPROX. 7 U.S. GALLONS)

MANUFACTURED BY: ARCH CHEMICALS, INC

501 MERRITT 7

NORWALK, CT 06858, USA



Rev Date: 9 AUG 05 Product Code: 08240

Label Ref: EPADOP25

VANQUISH is a registered trademark of Arch UK Biocides Ltd.