

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 10 2005

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

Attn: Mark Burt
Regulatory Manager

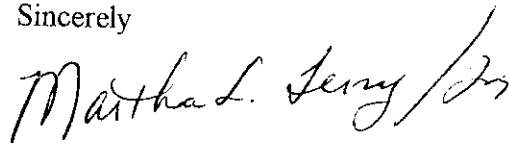
Subject: Vanquish SL 10 Antimicrobial
EPA File Symbol 1258-1285
Your Notification Dated January 31, 2005

This will acknowledge receipt of your notification to correct typographical errors on the container label, correct the signal word to read "WARNING" on center panel and to change the word in the "Environmental Hazards" statement to read "pollutant" and not "pollution", 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 January 31, 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								



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 1258-1285	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Vanquish SL 10 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: correct typographical errors on container label - correct signal word to read WARNING on center panel; to change word in Environmental Hazards statement to read 'pollutant' and not 'pollution'.

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		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
If "Yes" Package wgt. No. per container					
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 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 (Stamped)
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Mark E. Burt	5. Date January 31, 2005	

PR Notice 98-10 Certification Statement

Product: Vanquish SL 10

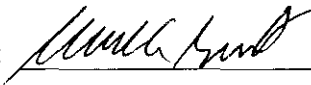
EPA Reg. No.: 1258-1285

Registrant: Arch Chemicals, Inc.

Notification to: correct typographical errors on container label – correct signal word to WARNING on center panel; to change word in Environmental Hazards statement to read ‘pollutant’ and not ‘pollution’.

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: January 31, 2005

Signature:  _____

Arch Chemicals, Inc.
Suite 250
1955 Lake Park Drive
Smyrna GA 30080
Tel: 770.801.6600

4 7 9



Via UPS

January 31, 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 Bell Street
Arlington, VA 22202

- Subject: Vanquish SL 10
 - EPA Reg. No. 1258-1285
 - Notification of Typographical Errors on EPA Stamped Accepted Label dated December 8, 2004

Dear Mr. Swindell:

It has come to our attention that the Vanquish SL 10 label that was submitted previously and EPA Stamped Accepted December 8, 2004, contained two typographical errors. The EPA Stamped Accepted label attached to the August 20, 2004 Notice of Registration had a WARNING signal word on the center panel. However, the label that was stamped accepted on December 8, 2004, erroneously indicated that the signal word on the center panel was DANGER. This notification corrects that typographical error so that the signal word in the center panel is WARNING.

Also, in the environmental hazards statement, the word 'pollution' should read 'pollutant' as per PR Notice 95-1. This notification corrects that typographical error.

We believe that these typographical changes to the Vanquish SL 10 container label can be made by notification as per PR Notice 98-10.

Enclosed is a completed notification form, a PR Notice 98-10 Certification Statement, and two copies of product labeling with the changes highlighted in yellow.

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Please reply to me at the above address.

Thank you for your cooperation. Please contact me at the above address, by phone at (302) 477-8129, by fax at (302) 477-8120, or by e-mail at MEBurt@archchemicals.com, if there are any questions.

Sincerely,



Mark E. Burt, Ph.D.
Regulatory Manger

VANQUISH® SL10 Antimicrobial

AN ANTIMICROBIAL / ANTIFUNGAL ADDITIVE FOR PLASTICS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING: CAUSES SKIN IRRITATION AND MODERATE EYE IRRITATION. HARMFUL IF SWALLOWED OR ABSORBED THROUGH THE SKIN. DO NOT GET IN EYES, ON SKIN OR ON CLOTHING. 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, USE A CHEMICAL RESISTANT APRON. WASH THOROUGHLY WITH SOAP AND WATER AFTER HANDLING AND BEFORE EATING, DRINKING, CHEWING GUM 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.

E.P.A. REG NO. 1258-1285

E.P.A. EST NO. 74637-GBR-001

MANUFACTURED BY: ARCH CHEMICALS, INC
501 MERRITT 7
NORWALK, CT 06856, USA



Rev Date: 25/01/05

Product Code: 45350

ACTIVE INGREDIENT:

N-BUTYL-1,2-BENZISOTHIAZOLIN-3-ONE.....4.75%
ZINC 2-PYRIDINETHIOL-1-OXIDE4.75%
INERT INGREDIENTS.....90.50%
TOTAL.....100.00%

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. DO NOT GIVE ANYTHING TO AN UNCONSCIOUS PERSON.

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.

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 FOR TREATMENT.

NOTE TO PHYSICIAN: POSSIBLE 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 INTO A MANNER INCONSISTENT WITH ITS LABELING. DO NOT USE FOR ANY APPLICATIONS INVOLVING DIRECT OR INDIRECT FOOD CONTACT AND/OR DRINKING WATER. SEE TECHNICAL INFORMATION BULLETIN FOR DIRECTIONS FOR USE.

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 FOR GUIDANCE

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.

FOR INFORMATION ON SPILLS.

CALL 1-800-654-6911

CONTENTS: 200Kg 440LBS. MINIMUM

(APPROX. 55 U.S. GALLONS)

Label Ref: EPAVSL10200

VANQUISH is a registered trademark of Arch UK Biocides Ltd.

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VANQUISH® SL 10 Antimicrobial

An Anti-microbial / Anti-fungal Additive for Plastics

SUMMARY

VANQUISH SL 10 antimicrobial, effective for control of fungi and bacteria, is based on the active ingredients N-butyl-1,2-benzisothiazolin-3-one and zinc 2-pyridinethiol-1-oxide. VANQUISH antimicrobial is used for the protection of plastic products made from polymers such as polyvinylchloride, polyurethane, and others.

VANQUISH SL 10 antimicrobial is registered with the Environmental Protection Agency and has EPA registration No. 1258-1285.

TYPICAL PROPERTIES OF VANQUISH SL 10 FORMULATION

<i>Composition</i>	A dispersion of N-butyl-1,2-benzisothiazolin-3-one and zinc 2-pyridine-thiol-1-oxide in di-isononylphthalate
<i>Active agents content, %</i>	4.75% w/w each
<i>Physical Form</i>	Liquid
<i>Viscosity cps (Brookfield LV spindle 3, 12 rpm @ 20oC),</i>	1500 to 3000
<i>Water Content, %</i>	<0.5%

GENERAL

VANQUISH SL 10 antimicrobial provides effective control of a wide range of bacterial and fungal organisms thereby preventing degradation of the product. It can protect the surface of substrates and can prevent objectionable odors and aesthetic problems such as staining, or growth on or in the substrate. VANQUISH SL 10 antimicrobial is easy to use due to its liquid form and excellent compatibility in most systems

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labelling. Do not use for any

applications involving direct or indirect food contact and/or drinking water contact.

Many plastics are considered to be resistant to microbial attack, but there are significant exceptions that merit preventative action by the use of antimicrobial additives. Plasticized PVC, polyurethanes and silicones are particularly susceptible. The biodeterioration of products based on these (and other) 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 SL 10 antimicrobial is effective against the microbes which degrade plastic (and plastic additives) can increase the useful life of plastic articles.

VANQUISH SL 10 antimicrobial additive is effective in most plastics compositions and can be used to preserve plastics such as PVC, polyurethanes, polyolefins and others to produce articles such as; shower curtains, coated fabric (e.g. ski wear, raincoats, tents, etc.), floor coverings, underlay & mats, vinyl wall coverings, tarpaulins and awnings, roofing membranes, synthetic leather (e.g. sneakers and training shoe uppers), swimming pool and ornamental pond liners, conveyor belts, appliance gaskets (e.g. washers, refrigerator, etc.), shoe soles and mid-soles, sealants, caulks, weather stripping, non-food contact adhesives, auto parts (e.g. landau tops, door seals, shock absorbers, etc.), foam (e.g. seat cushions, gaskets, insulation) electrical & pipe wrap, furniture (e.g. outdoor, leisure, water bed liners, cushions).

(continued on next page)

VANQUISH® SL 10 Antimicrobial

An Anti-microbial / Anti-fungal Additive for Plastics

VANQUISH SL 10 antimicrobial additive has been found to be an effective polymer preservative at concentrations of 0.5% to 8.0% based on the total weight of the substrate. Typical range of concentrations on which trials can be based, are:

Application	%VANQUISH SL 10 Antimicrobial (based on total weight of final product)
Polyvinylchlorides	0.5 to 8.0
Polyurethanes	0.5 to 8.0
Silicones	1.0 to 8.0
Polyolefins	1.0 to 8.0

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, and length of time for which protection is required.

INCORPORATION OF VANQUISH SL 10 ANTIMICROBIAL INTO POLYMERS

Polyurethane: For addition to cross linked polyurethane VANQUISH SL 10 should be added to the polyol mixture at a concentration that will yield the desired use level in the final product after curing with isocyanate. For thermoplastic polyurethane see 'Melt-Processed Polymers' below.

Melt Processed Polymers: For addition to melt processed polymers (PVC, thermo-plastic polyurethane, etc.), Vanquish SL10 may be metered into the melt at the injection point in an extrusion system to yield concentrated chips (masterbatch) or the desired end use concentration. Masterbatch chips can be blended with non-preserved chips in the users plant to yield the desired end use concentration upon subsequent melt processing.

For PVC VANQUISH SL 10 may also be added to the mixed liquid components which are added to a blend of

resin and other solid components, shear mixed until a dry blend is achieved and then processed through extrusion, calendaring, molding or other system.

PVC Plastics: Incorporation is very flexible and VANQUISH SL 10 antimicrobial liquid may be added to other liquid components during manufacture or blended into a ready-made plastisol. Use levels should be calculated based upon the total weight of the formulation.

For silicone sealants, the VANQUISH SL 10 may be added to the silicone oil before processing, or to the manufacturing vessel before packing off.

For polyolefin, VANQUISH SL 10 may be mixed with powdered polymer to yield the desired end use concentration then extruded, followed by fabrication to molding or film, etc. Alternatively, VANQUISH SL 10 may be made into a masterbatch by extrusion, diluted to end-use concentration with more polymer in the extruder, then fabricated as required.

Arch Chemicals, Inc. can provide guidance on the proper use of Vanquish antimicrobial.

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 do so by a poison control center or doctor. Do not give anything to an unconscious person.

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.

(continued on next page)

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.

For additional information in case of emergency call toll free 1-800-654-6911. Have the product container or labeling with you when calling a poison control center or doctor or going for treatment.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Causes skin irritation and moderate eye irritation. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin or clothing. Wear goggles or face shield and chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing 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 Pollution 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.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

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.

For information on spills, call 1-800-654-6911.

SAFE HANDLING INFORMATION

Refer to the Material Safety Data Sheet (MSDS) available from Arch Chemicals, Inc. for information on the safe use, handling and disposal of this product.

FOR YOUR PROTECTION

Arch Chemicals, Inc. ("Arch") warrants that this product conforms to the chemical description on the label and that it is reasonably fit for the purposes stated on the label when used in accordance with Arch's directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arch, and the buyer or user assumes the risk of any such use. ARCH DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY. Statements herein, therefore, should not be construed as representations or warranties.

Arch Biocides

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www.archbiocides.com