

1258-1285

9/7/2005

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SEP 7 2005 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 August 11, 2005

This will acknowledge receipt of your notification to add some administrative statements and to delete the DOT shipping, 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 11, 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								



Please read instructions on reverse before completing form.



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 checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Vanquis 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: add the following to the label - Lbs. Net Minimum, Lot Number: See Attached Label, Rev. Date, Made in UK. , add Label Ref

### 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	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
<i>Certification must be submitted</i> If "Yes" Unit Packaging wgt.    No. per container		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 <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) 803-2520
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 Mark E. Burt	
4. Typed Name Mark E. Burt	5. Date August 11, 2005	

**Arch Chemicals, Inc.**  
1955 Lake Park Drive  
Suite 100  
Smyrna, GA 30080  
Tel: 770.801.6600

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Via UPS

August 11, 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 SL 10 Antimicrobial  
EPA Reg. No. 1258-1285  
- Notification


Dear Mr. Swindell:

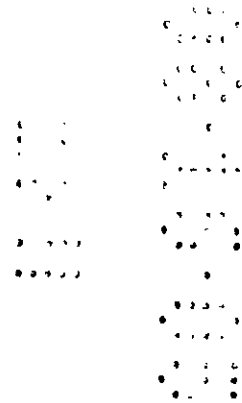
Arch Chemicals, Inc. would like to add some administrative statements the Vanquish SL 10 label and to delete the DOT shipping name. The administrative statements are: Lbs. Net Minimum, Lot Number: See Attached Label, Rev. Date, and Made in UK.

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

Sincerely,

  
Mark E. Burt, Ph.D.  
Regulatory Manager



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PR Notice 98-10 Certification Statement

Product: Vanquish SL 10 Antimicrobial

EPA Reg. No.: 1258-1285

Registrant: Arch Chemicals, Inc.

Notification to: add the following to the label – Lbs. Net Minimum, Lot Number: See Attached Label, Rev. Date, Made in UK. *add Label Ref*

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 11, 2005

Signature: *M.E. Burt*



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(Center Panel)

**Vanquish SL 10 Antimicrobial**

**An Anti-microbial / Anti-fungal Additive for Plastics**

Active Ingredients:	N-butyl-1,2-benzisothiazolin-3-one.....	4.75%
	Zinc 2-pyridienthiol-1-oxide.....	4.75%
Inert Ingredients:	.....	90.5%
Total Ingredients:	.....	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 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. 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

**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 label with you when calling a poison control center or doctor or going for treatment.

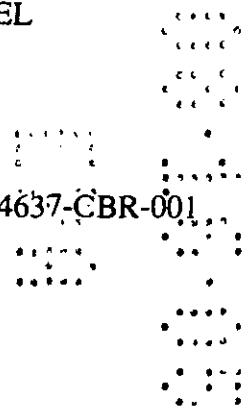
**NOTE TO PHYSICIAN:** Possible mucosal damage may contraindicate the use of gastric lavage following ingestion

**SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON SIDE PANEL**

Contents: Lbs Net Minimum ( kg)  
US Gallons

EPA Reg. No. 1258-1285

EPA Est. No. 74637-CBR-001



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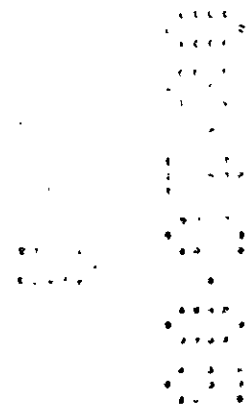
Manufactured for:  
Arch Chemicals, Inc.  
501 Merritt 7  
Norwalk, CT 06856

Rev Date: 9 Aug 05  
Lot Number: See attached label.

Made in: UK  
Product Code: 45350

**Vanquish is a Registered Trademark of Arch UK Biocides LTD**

LABEL REF EPASL10



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(Left Panel)

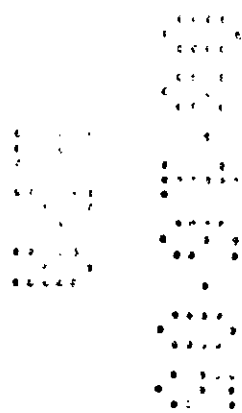
**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**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. 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 Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to the 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. **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 anti-microbial 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) and 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).



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:

<u>Application</u>	<b>% VANQUISH SL 10 Antimicrobial (based on total weight of final product)</b>
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.

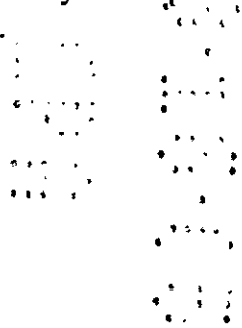
**INCORPORATION OF VANQUISH SL 10 ANTIMICROBIAL INTO POLYMERS**

**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, calendering, molding or other system.

**PVC Plastisols:** Incorporation is very flexible and VANQUISH SL 10 anti-microbial 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.



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**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.

The Arch Chemicals, Inc. can provide guidance on the proper use of Vanquish anti-microbial.

**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, 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

