UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



United States Environmental Protection Office of Pesticide Programs Agency

DEC 2 3 2008

Arch Chemical, Inc. 1955 Lake Park Drive, Suite 100 Smyrna, GA 30080

Attention: Garret B. Schifilliti

Senior Regulatory Manager

Subject: Vanguish SL10 Antimicrobial

EPA Registration No. 1258-1285

Your Amendment Dated December 2, 2008

This will acknowledge receipt of your notification of changes to the Storage and Disposal Statements for the "Container Rule", 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 December 2, 2008 is in compliance with PR Notice 98-10 and is acceptable. This Notification 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 Antimorobials Division (7510C)

2/6

Please read instructions on r	everse before comple	tin		Form A	pproved	1. Ok.	No. 20	70-0060	Approval expires 2-28-99	
United States Environmental Protection Age Washington, DC 20460					✓	_	strat endm er		OPP Identifier Number	
		Application	on for Pesti	cide - Se	ction	ı				
1. Company/Product Number 1258-1285	2. EPA Product Manager Marshall Swindell					3. Proposed Classification ✓ None Restricted				
4. Company/Product (Name) Vanquish SL10 Antimic	PM#	PM# 33								
5. Name and Address of Applicant (Include ZIP Code) Arch Chemicals, Inc. 1955 Lake Park Drive Smyrna, GA 30080 Check if this is a new address				6. Expedited Reveiw. 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	- 11	- 					
Amendment - Explain Resubmission in resp Notification - Explain Explanation: Use addition * Notification of changes to S * Submittal of Electronic Lab This notification is consistent labeling or the confidential sta	below. al page(s) if necessar Storage & Disposal Statels. with the provisions of Fatement of formula of the at if this notification is not	y. (For section terments for the PR Notice 98-1) his product. I under the consistent were the product of the consistent were the product of t	"Container Rule". 0 and EPA regula nderstand that it is ith the terms of Pl	tions at 40 CF s a violation of R Notice 98-10	Applica Applic	elow.	o other o	changes willfully r	nake any false statement to	
FIFRA and I may be subject			nder sections 12 a	and 14 of FIFR						
			Section -	· []]						
1. Material This Product Will	Be Packaged In:					т				
Thild-Resistant Packaging Yes No * Certification must be submitted Unit Packaging Yes No. per Unit Packaging wgt.			Water Soluble Packaging Yes No If "Yes" Package wgt No. per Package wgt No. per					f Container Metal Plastic Glass Paper Other (Specify)		
3. Location of Net Contents	tail Container	ntainer 5. Location of La				bel Directions				
6. Manner in Which Label is	graph Other									
			Section -	IV						
1. Contact Point (Complete	items directly below f	or identification	on of individual to	be contacted	d, if nec	essary,	to prod	ess this	application.)	
Name Garrett B. Schifilliti			Title Senior Regulatory Manager				- 1	Telephone No. (Include Area Code) (203) 271-4154		
l certify that the stater I acknowledge that an both under applicable (y knowlinglly false or		l all attachments				d com		6. Date Application Received (Scamped)	
2. Signature / Sant Shephite			3. Title Senior Regulatory Manager					((((((((((((((((((((((((((((((((((((((
4. Typed Name Garrett B. Schifilliti			5. Date 12/02/08							

Vanquish SL 10 Antimicrobial

ACTIVE INGREDIENT:

EPA Reg. No. 1258-1285 EPA Est. No. 1258-NY-3

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE FIRST AID & ADDITIONAL PRECAUTIONARY STATEMENTS ON SIDE PANEL

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

Made in the UK.

Vanquish® is a registered trademark of Arch UK Biocides, Ltd.

Net Weight 25 Lbs.

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.

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 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, and then give artificial respiration, preferably mouth-to mouth, if possible. Call a Poison Control Center or doctor for further treatment advice.

If Swallowed: Call a poison control center or doctor immediately for treatment advice. Have person bip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center of doctor. Do not give anything by mouth to an unconscious person.

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.

In case of emergency, for additional information call 1-800-654-6911.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, streams, 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.

STORAGE AND DISPOSAL: Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Protect from frost. If frozen, thaw and stir well before use.

PESTICIDE DISPOSAL: [For containers > 5 gallons] 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. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

PESTICIDE DISPOSAL: [For containers < 5 gallons] 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. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container promptly after emptying. 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.



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 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. This product is effective against the microbes which degrade plastic (and plastic additives) and can increase the useful life of plastic articles. This product 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).

This product 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: Polyvinylchlorides 0.5 to 8.0% (wt/wt.), Polyurethanes 0.5 to 8.0% (wt./wt.), Silicones 1.0 to 8.0% (wt./wt.), Polyolefins 1.0 to 8.0% (wt./wt.). 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 INTO POLYMERS:

Polyurethane: For addition to cross linked polyurethane this product 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.), this product 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 this product 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 this product 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, this product may be added to the silicone oil before processing, or to the manufacturing vessel before packing off.

For polyolefin, this product may be mixed with powdered polymer to yield the desired end use concentration then extruded, followed by fabrication to molding or film, etc. Alternatively, this product 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 this product.

(001258-01285.20082611.VanquishSL10LabelContainerRule)