

5383-117

11/3/2012

1044



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460**

**OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION**

January 3, 2012

Mr. Adrian Krygsman, Director
Troy Chemical Corp. c/o
Troy Corporation
8 Vreeland Road
Florham Park, N.J. 07932

Subject: Polyphase 612
EPA Registration Number: 5383-117
Letter Date: October 3, 2011
EPA Receipt Date: November 1, 2011

Dear Mr. Krygsman:

The label amendment, submitted in connection with registration under section of the federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following comments listed below:

Proposed Amendment:

- Add uses to master label for in-can preservative for home cleaning and laundry additive products.

Labeling Comments:

For the purpose of clarity and consistency with other labels, the following label revisions must be made:

1. Separate the following statement from the directions for use and place it under the following sub-heading to read:

General Precautions and Restrictions

Do not apply this product in a way that will contact workers or other persons. This product is not to be used in paper, paper coatings or adhesives that will come in contact with food and food surfaces. This product is not cleared by the Federal

Food, Drug and Cosmetic Act for use on food-contact paper and adhesives. If articles have been treated with Polyphase 612, do not use them as components in materials used in food packaging and food-holding. Do not use on wood composites that will come in contact with food, etc.....

2. The directions need to be updated to indicate how and where/when to apply the product to various applications. Refer to EPA Reg. Number 1529-41 as an example.
3. According to the IPBC Reregistration Eligibility Document, end-use product for industrial use must add the following Personal Protective Equipment and User Safety Instructions sections:

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- long-sleeve shirt and long pants;
- goggles, face-shield, or safety glasses;
- chemical resistant gloves (such as Barrier laminate, Butyl Rubber, Neoprene Rubber, or Nitrile Rubber);
- shoes plus socks

User Safety Instructions

Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users must remove personnel protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly.

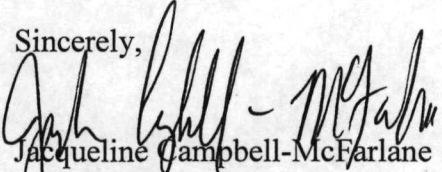
4. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.
5. As per the results of your acute toxicity data, the Statement of Practical Treatment In accordance with the label manual and for labeling consistency, the "In case of emergency number" and its instructions should be placed in the same block, below the "Have the product container, etc...." statement.

-3-

Within six (60) days from the date of this letter, submit three (3) copies of the final printed label bearing the revisions as stated above. Should you have any questions or comments concerning this letter, please contact Adam Heyward via email at heyward.adam@epa.gov or by telephone at (703) 347-0274 during the hours of 6:00 am to 2:30 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

A stamped copy of the label is enclosed for your record.

Sincerely,


Jacqueline Campbell-McFarlane
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: Stamped Labeling

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco.

POLYPHASE® 612

A Fungicide for Use in

Wood Composite Products, Plastics, and Paints *Home Care Cleaning Products including Floor Cleaners, Waxes, Polishes, and Surface Cleaners, Laundry Additives including Liquid Laundry Detergents, Fabric Softeners, and Stain Removers*

EPA Reg. No. 5383-117
EPA Est. No. 5383-NJ-1

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to any body of water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. 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 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.

FIRST AID

IF IN EYES:	<ul style="list-style-type: none">Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing.
	<ul style="list-style-type: none">Call a poison control center or doctor for treatment advice.
IF ON SKIN:	<ul style="list-style-type: none">Take off clothing.Rinse skin immediately with plenty of water for 15-20 minutes.Call a poison control center or doctor for treatment advice.
	<ul style="list-style-type: none">Call a poison control center or doctor immediately for treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none">Have person sip a glass of water if able to swallow.Do not induce vomiting unless told to do by a poison control center or 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.

ACTIVE INGREDIENT:

3-Iodo-2-Propynyl Butyl Carbamate..... 12.0%

INERT INGREDIENTS..... 88.0%
TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SOLD FOR INDUSTRIAL USE ONLY
SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

ACCEPTED
with COMMENTS
EPA Letter Dated:

JAN - 3 2012

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the Pesticide, registered under EPA Reg. No.

5383-117

IN CASE OF EMERGENCY CALL 1-800-424-9300

TROY CHEMICAL CORPORATION

ONE AVENUE L

NEWARK, N.J. 07105

Net Weight:

©TROYSAN AND POLYPHASE ARE REGISTERED TRADEMARKS

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons. Polyphase®612 is sold for industrial use only. This product is not to be used in paper, paper coatings or adhesives that will come into contact with food and food surfaces. [This product is not cleared by the Federal Food, Drug and Cosmetic Act for use on food-contact paper and adhesives. If articles have been treated with Polyphase®612 do not use them as components in materials used in food packaging and food-holding.] Suggested application levels are based on laboratory and field evaluations and are typical for the use areas indicated. Suggested use levels are reported as percentage weight/weight in the final use product.

Wood Composites 0.67-5%
Plastics 0.67-5%
Paints 0.67-5%
Home Cleaning Products/Laundry Additives 0.67-5%

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Polyphase®612 should not be stored at temperatures below 0°C (32°F). **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticides, 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: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the 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. Then offer for recycling or reconditioning if available, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

This product is covered under the following patent: US 5,906,981

4064