PNL32 6836-119 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Lonza, Inc. 17-17 Route 208 Fair Lawn, NJ 07410

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Attn: Eliot Harrison, Authorized Agent for Lonza, Inc.

Subject: Dantogard EPA Registration No. 6836-119 Your Submissions of March 21 and November 7, 1994

The proposal to amend the subject registration by the addition of two new uses; a preservative/antimicrobial agent in clay slurries used in the manufacture of non-food contact paper products and in metalworking fluids, has been reviewed. The following comments are a result of the Agency's review.

1. The use of the subject product as a preservative in clay slurries used in pulp and paper manufacturing processes is acceptable. However, as indicated in previous and subsequent correspondences, the use of the subject product as a preservative in the manufacture of food contact paper products is not allowable without Food Additive approval from FDA.

2. The proposed new use for the subject product formulation as a preservative in metalworking fluids is acceptable.

3. The revised product labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy is enclosed for your records. Submit three copies of the final, printed product labeling incorporating these comments before releasing the product for shipment.

a. In the Precautionary Statements, add the following instructions "Wear chemical resistant gloves when using this product.".

b. In the use directions which concern metalworking fluids, add the following statements: "Workers should take precautions to minimize inhalation exposure to metalworking fluid mists. OSHA limits for oil mist: Time Weighted Average (TWA = $5mg/m^3$); Short Term Exposure Limit (STEL = $10mg/m^3$)."

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c. Place asterisks (*) in the Use Directions sentences pertaining to use of the subject product in the manufacture of paper products. (In the first paragraph: "Dantogard preserves ...*", and in the subordinate sentence: "Note: Dantogard may not be used ...*".)

d. Revise the Environmental Hazards statement to read in accordance with PR Notice 93-10.

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If you should have any questions concerning this letter, you may call Robert Travaglini on (703) 305-6909.

Sincerely,

Ruth G. Douglas Product Manager (32) Antimicrobial Program Branch Registration Division (7505C) CHYD

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

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.

STORAGE AND DISPOSAL

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

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay o(it of smoke.

Contents: LIQUID

Active Ingredients	
1,3-Bis(hydroxymethyl)-5,5-dimethylhydantoin	32.0%
Hydroxymethyl-4,4-dimethylhydantoin	. 7.5%
Inert Ingredients	60.5%

EPA Reg. #6836-119 EPA Est. # 6836-PA-1 NET WEIGHT (as marked on container)

KEEP OUT OF REACH OF CHILDREN CAUTION

STATEMENT OF PRACTICAL TREATMENT

EYES: Flush eyes with plenty of running water for several minutes. Seek medical attention if irritation develops of persists. SKIN: Wash affected areas with plenty of water, and soap if available, for several minutes. Remove and clean contaminated clothing and shoes. Seek medical attention if irritation develops or persists.

INHALATION: Remove from area to fresh air. If not breathing, clear airway and start mouth-to-mouth artificial respiration or use a bag-mask respirator. Get immediate medical attention. If victim is having trouble breathing, transport to medical care and, if available, give supplemental oxygen.

INGESTION: If swallowed, give 3-4 glasses of water. Induce vomiting by placing a finger on the back of the victim's tongue. Give fluids until vomitus is clear. DO NOT induce vomiting or give anything by mouth to an unconscious or convulsing person. Seek medical attention.

DIRECTIONS FOR

It is a violation of Federal Law to use t inconsistent with its labeling.

DANTOGARD[™] preserves and aids in the bacteria and lungi in water based coatine and water based emulsions), water adhesives, caulks, joint cements, resine processing chemicals (lubricants, sizing liquid detergents, soft soaps, room deod paints for industrial and household use. If added to the formulation to be preserved lbs. per 100 lbs. or 3,400 to 13,800 pf weight of the formulation to be protected

DANTOGARDT[™] may be used in metal fungal growth at concentrations of 0 DANTOGARD[™] should be checked peri oils are unstable upon standing.

DANTOGARD[™] preserves and controls aqueous dispersions of inorganic minera the manufacture of paper and paperboard levels of 1.0 to 6.0 lbs. per ton of aqueous ppm).

NOTE: DANTOGARD^{*} may not be a articles for use in packaging or holding f

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