6836-326

3/1/2011



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

> OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Lonza Inc. 90 Boroline Road Allendale, NJ 07401

MAR - 1 2011

Attention: Joanna Holcombe Sr. Commercial Regulatory Services Associate

Subject: REVISED- Isocil WT – Label Notification to add storage and disposal language EPA Reg. No. 6836-326 Notification Letter Dated January 6, 2011

This will acknowledge receipt of your notification for the aforementioned product label, submitted under the provisions of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 3° (9). Based on a review of the submitted material, the following apply:

o Acceptance of the Notification.

In an Agency letter dated January 27, 2011, the Agency rejected this notification on the grounds that, "the proposed language for Container Disposal of Plastic or Metal Containers is not clear, particularly the phrase 'fill the container about 10 percent full with water.'" The Company representative contacted the Agency on February 9 and made the Agency aware that the proposed language was pulled directly from PR Notice 2007-4. The Agency acknowledges the error and this letter should supersede the January 27, 2011 letter.

This information has been made a part of your file.

If you have any questions concerning this letter, please contact Abigail Downs at (703) 305-5259.

Sincerely,

Marshall Swindell Product Manager (33) Regulatory Management Branch I Antimicrobials Division (7510P)



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

JAN 27 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Lonza Inc. 90 Boroline Road Allendale, NJ 07401

Attention: Joanna Holcombe Sr. Commercial Regulatory Services Associate

Subject: Isocil WT – Label Notification to add storage and disposal language EPA Reg. No. 6836-326 Notification Letter Dated January 6, 2011

This will acknowledge receipt of your notification for the aforementioned product label, submitted under the provisions of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 3° (9). Based on a review of the submitted material, the following apply:

o Rejection of the Notification.

The Notification is rejected on the basis that the proposed language for Container Disposal of Plastic or Metal Containers is not clear, particularly the phrase "fill the container about 10 percent full with water." Note that the same pesticide disposal language as found on page five of the label under the heading Container Disposal for Plastic and Metal Containers for containers over 5 gallons may be used for the refillable container. This information has been made a part of your file.

If you have any questions concerning this letter, please contact Abigail Downs at (703) 305-5259.

Sincerely,

Marshall Swindell Product Manager (33) Regulatory Management Branch I Antimicrobials Division (7510P)

Wa	United States Intal Protection Agen shington, DC 20460	ncy	Regist Ameno Other		OPP Identifier Number
		on for Pes	ticide - Section	1	
1. Company/Product Number 6836-326		2. EPA Pro	duct Manager		3. Proposed Classification
. Company/Product (Name) Isocil WT		PM# 33		None Restricted	
 Name and Address of Applicant (Include ZII Lonza Inc. 90 Boroline Road Allendale, NJ 07401 Check if this is a new address 	P Code)		in composition and la g. No.		ction 3(c)(3)(b)(I), my product is simila
		Section	n – II		
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below. Explanation: Use additional page(s) if necessary.		_	Final printed labels in response to Agency letter dated "Me Too" Application Other - Explain below		
Label Notification to add	*No	t Subjec	t to PRIA*		
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1. Material This Product Will Be Packaged Child-Resistant Packaging Yes* No *Certification must be	Unit Packaging Yes No If "Yes"	Section No. per container		1-6-11	2. Type of Container Metal Plastic Glass Paper
1. Material This Product Will Be Packaged Child-Resistant Packaging Yes* No *Certification must be	Unit Packaging Yes No If "Yes"	No. per	- III Water Soluble Pa Yes No If "Yes"	1-6-11 ckaging No. per	Metal Plastic
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1. Material This Product Will Be Packaged Child-Resistant Packaging Yes* No *Certification must be submitted 3. Location of Net Contents Information Xabel Container 6. Manner in Which Label is Affixed to Prod 1. Contact Point (Complete items directly be Name	Unit Packaging Yes No If "Yes" Unit Packaging wgt. 4. Size(s) Retail 1 oz. to bulk duct Lithog Paper Stencil Certification of ind Certification his form and all attachment ment may be punishable by 3. T	No. per container Container raph glued led Section dividual to be Fr. Comme associate n s thereto are tr fine or impris itle	- III Water Soluble Pa Yes No If "Yes" Package wgt. Other - IV contacted, if necessat	No. per container 5. Location of On Labo On labo	Metal Plastic Glass Glass Paper Other (Specify) of Label Directions el ling accompanying product plication) Telephone No? (Include Area Code 201-316-9237 6. Date Application Received (Stamped)

Lonza

Via FedEx

5

Mr. Marshall Swindell, PM-33 Document Processing Desk (PRN) Office of Pesticide Programs (7504P) US Environmental Protection Agency Room S-4900, One Potomac Yard 2227 S. Crystal Drive Arlington, VA 22202 Lonza Inc Allendale 90 Boroline Road Allendale, NJ 07401, USA

Joanna Holcombe Lonza Life Science Ingredients Commercial Regulatory Services

Tel 201-316-9297 Fax 201-696-3470 joanna.holcombe@lonza.com

January 6, 2011

SUBJECT: Isocil WT, EPA Reg. No. 6836-326 Application for Label Notification

Dear Mr. Swindell:

I am submitting an application to add storage and disposal language for refillable containers per PR Notice 2007-4. I have also moved the statement "Store between 32 - 100°F" that was at the end of the nonrefillable container storage and disposal language into the "Pesticide Storage" section. Please find the enclosed documents in support of this notification:

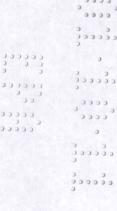
- Application for Notification;
- One copy of the proposed label with changes highlighted; and
- Two copies of the proposed label

If you have any questions or need any additional information, please feel free to contact me at 201-316-9297.

Sincerely, Lonza Inc.

Jonna Holcombe

Joanna Holcombe



ISOCIL WT

INDUSTRIAL MILDEWCIDE – FOR USE AS AN INDUSTRIAL MILDEWCIDE IN COATINGS PAINTS, BUILDING MATERIALS, WALLPAPER PASTES, ADHESIVES, AQUEOUS ADHESIVES AND TACKIFIERS.

FOR USE BY MANUFACTURERS ONLY FOR USE IN COATINGS, PAINTS, BUILDING MATERIALS, WALLPAPER PASTES AND ADHESIVES, AQUEOUS ADHESIVES AND TACKIFIERS, LEATHER, HIDES, METALWORKING CUTTING FLUIDS, FABRIC, VINYL, PLASTICS, EMULSIONS, HYDRAULIC FLUIDS, TEXTILES, LAUNDRY, AIR WASHER WATER, COOLING TOWER WATER, CAULKING COMPOUNDS, FABRIC SURFACES, POLYMERS AND POLYURETHANE.

KEEP OUT OF REACH OF CHILDREN

DANGER

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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes.

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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

Call a poison control center or doctor for treatment advice. 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. Measures against circulatory shock, respiratory depression and convulsions may be needed.

SEE SIDE PANEL FOR PRECAUTIONARY STATEMENTS.

EPA Reg. No. 6836-326 EPA Est. No. (<u>as indicated on container</u>) Net Contents: <u>(as indicated on container</u>) [Country of origin (insert country)] [Manufactured in (insert country)] [Barcode]

MANUFACTURED FOR:

Lonza Inc. 90 Boroline Road Allendale, NJ 07401

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Harmful if inhaled. Wear goggles or face shield, protective clothing and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse. Avoid breathing vapor.

ENVIRONMENTAL HAZARDS

This chemical is toxic to fish and wildlife. 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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Isocil WT is for use as an industrial mildewcide in coatings, paints, building materials, wallpaper pastes and adhesives, aqueous adhesives and tackifiers.

Do not use treated material for construction of honey bee hives.

COATINGS

For use as a mildewcide in coatings such as wood coatings, wood coating solutions, latex and solvent-based paints, semi-transparent stains and solid stains. Use 1.0 to 3.0 pounds of ISOCIL WT per 100 gallons of coating formulation. If necessary, a higher dosage up to 4.0 pounds of ISOCIL WT per 100 gallons may be used depending upon level of control required.

In latex coatings, ISOCIL WT should be added during the letdown phase of paint manufacture. To ensure uniform distribution throughout the coating, it is recommended that ISOCIL WT be premixed with propylene glycol and coalescent. The premix should be added slowly, with good agitation, just prior to the addition of the thickener. In solvent-based coatings, a coupling solvent such as butyl Cellosolve[®] may be used to assist in mixing ISOCIL WT.

CONCENTRATES

ISOCIL WT should be added to the polymer latex concentrate at a level to ensure that the final use-dilution will contain 1.0 to 3.0 pounds of ISOCIL WT per 100 gallons of coating formulation.

Dosage levels of ISOCIL WT will depend upon the type of formulation, the presence and level of zinc oxide in the system, and the climate in which the material will be exposed.

BUILDING MATERIALS

For use as a mildewcide in building materials such as elastomeric roof and wall coatings and sealants, caulks, sealants, joint cements, spackling, stucco and grouting. Use 1.0 to 3.0 pounds of Isocil WT per 100 gallons of formulation.

WALLPAPER PASTES AND ADHESIVES

For use as a mildewcidal preservative to protect materials such as polyvinyl acetate, starch and dextrin-based pastes from fungal attack after they are applied. Use 0.1 to 0.15 pounds of Isocil WT per 100 gallons of formulation.

ADHESIVE AND TACKIFIERS PRESERVATION

For use as a mildewcidal preservative in water soluble and water dispersed adhesives such as animal glues, vegetable glues, natural rubber latices, polyvinyl acetate, styrene-butadiene, polyurethane, epoxy, acrylic latices, and tackifiers derived from rosin and hydrocarbon resins. Use 0.10 to 0.20 pounds of Isocil WT per 100 pounds of formulation.

Isocil WT is also sold for use in the formulation of industrial mildewcides in the following uses. Formulators using this product are responsible for providing data for the EPA registration of their formulated products.

COATINGS

For use as a mildewcide in coatings such as latex and solvent-based paints, semi-transparent stains, and solid stains.

BUILDING MATERIALS

For use as a mildewcide in building materials such as elastomeric roof and wall coatings and mastics, caulks, sealants, joint cements, spackling, stucco, and grouting.

WALLPAPER PASTES AND ADHESIVES

For use as a mildewcidal preservative to protect materials such as polyvinyl acetate, starch and dextrin-based pastes from fungal attack after they are applied.

AQUEOUS ADHESIVE AND TACKIFIER PRESERVATION

For use as a mildewcidal preservative in water-soluble and water-dispersed adhesives such as animal glues, vegetable glues, natural rubber latices, polyvinyl acetate styrene-butadiene, polyurethane, epoxy, acrylic latices and tackifiers derived from rosin and hydrocarbon resins.

LEATHER AND HIDE

For use in the prevention of mold, bacteria and fungi in the storage and transport of wet leather stock such as pickled, chrome-tanned and vegetable-tanned leather and hides.

METALWORKING CUTTING FLUIDS

For use as a mildewcidal preservative in soluble and emulsifiable aqueous metalworking fluids.

HYDRAULIC FLUIDS

For use as a preservative in the manufacture and use of high water-based hydraulic fluids and invert emulsion hydraulic fluids typically prepared by emulsifying 40% by volume water in 60% by volume of mineral oil using an oil soluble emulsifying agent.

VINYL AND PLASTICS

For use as a mildewcidal preservative in plastics and vinyl materials.

TEXTILES, LAUNDRY, FABRIC, FABRIC SURFACES, FABRIC MILDEWCIDE

For use to prevent mildew in laundered fabric, treated fabric, treated fabric surfaces, and textiles.

AIR WASHER WATER

For use as a mildewcidal preservative to prevent fouling in industrial air washer systems.

COOLING TOWER WATER

For use as a mildewcidal preservative to prevent fouling in water cooling systems when added to the reservoir, recirculating line or some other point to insure uniform mixing.

EMULSIONS, POLYMERS, AND POLYURETHANE

For use as a mildewcidal preservative in the manufacture and storage of synthetic and natural rubber polymer latices including: acrylic; styrene/butadiene; carboxylated styrene/butadiene; ethylene/vinyl acetate; polyurethane; and biopolymers intended for industrial use such as xanthan gum, gum Arabic, guar gum, protein derived polymers, starches and casein derived polymers.

(Note to reviewer: For Nonrefillable Containers for commercial, industrial, and institutional uses. Chapter 13, Table 6 of the Label Review Manual states that for "All products in containers that could be burned," the registrant has the option to "Remain silent on burning;" therefore, no incineration language is provided for plastic containers.)

STORAGE AND DISPOSAL

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

Pesticide Storage:

This product is corrosive to mild steel. Do not store or transport in unlined metal containers. Do not contaminate with strong oxidizing or reducing agents. Store between 32 - 100°F. Open dumping is prohibited. Store in original container in areas inaccessible to children.

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.

(Note to reviewer: This Container Statement will be used only for containers 5 gallons or less:) Container Disposal:

Nonrefillable container. Do not reuse or refill this container.

(Plastic and Metal Containers:) Triple rinse as follows: Empty the 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. Then offer for recycling or reconditioning. If not available, puncture and dispose in sanitary landfill. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state, and federal regulations.

(For metal containers only: DO NOT cut or weld metal containers.)

(Note to reviewer: This Container Statement will be used for containers over 5 gallons:) Container Disposal:

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying.

(Plastic Containers:) Triple rinse as follows: Fill container ¼ full with water and reclose the container. Agitate vigorously, and dispose of rinsate consistent with pesticide disposal instructions. Repeat two more times. Then offer for recycling if available or puncture and dispose in sanitary landfill or by other procedures approved by state and local authorities. Follow pesticide disposal instructions for rinsate. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state, and federal regulations.

(Metal Containers:) Triple rinse as follows: Fill container ¼ full with water and reclose the container. Agitate vigorously, and dispose of rinsate consistent with pesticide disposal instructions. Repeat two more times. Then offer for recycling if available or puncture and dispose in sanitary landfill or by other procedures approved by state and local authorities. Follow pesticide disposal instructions for rinsate. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state, and federal regulations. DO NOT cut or weld metal containers.

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Pesticide Storage:

This product is corrosive to mild steel. Do not store or transport in unlined metal containers. Do not contaminate with strong oxidizing or reducing agents. Store between 32 - 100°F. Open dumping is prohibited. Store in original container in areas inaccessible to children.

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:

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before refilling is the responsibility of the refiller. Cleaning the container before final disposal is the responsibility of the person disposing of the container.

(Plastic or Metal Containers:) To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in sanitary landfill. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state, and federal regulations.

(For metal containers only: DO NOT cut or weld metal containers.)