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10466-37

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 20 1999

Olivia D. Laird
Thomson Research Associates
95 King Street East, Suite 100
Toronto, ON M5C 1G4, Canada

Dear Ms. Laird:

Subject: Added use
Ultra-Fresh® 15
EPA Registration No. 10466-37
Your resubmission of June 23, 1999

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

The statement "No adverse effects were noted." included in the Technical Data Sheet under the heading "PHYSICAL PROPERTIES" must be deleted.

Revise the statement "Ultra-Fresh® 15 can be used to prevent bacterial, mildew, and algal growth in the following product:" to read "Ultra-Fresh® can be used to protect the following products from bacteria, mildew, and algal growth."

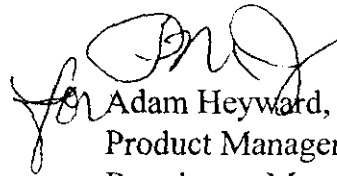
The statement "The low toxicity of Ultra-Fresh® 15" included in the Product Information Sheet for thermosetting resins must be deleted.

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

If you have questions concerning this letter, please contact Portia Jenkins at 703-308-6230.

Sincerely yours,

A handwritten signature in black ink, appearing to read "for Adam Heyward". The signature is written in a cursive style with a large, stylized "A" and "H".

Adam Heyward,
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure

ANTIMICROBIAL AGENT

Ultra-Fresh® 15

ACTIVE INGREDIENTS:

Diiodomethyl p-tolyl sulfone 15 %

INERT INGREDIENTS 85 %

TOTAL 100 %

KEEP OUT OF REACH OF CHILDREN DANGER!

**CORROSIVE: CAUSES IRREVERSIBLE
EYE DAMAGE**

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Can be fatal if swallowed, inhaled or absorbed through skin.

Causes eye and skin irritation.

Do not get in eyes, on skin or on clothing.

Harmful if swallowed.

Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Wear goggles, face shield or safety glasses.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyes open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Drink a large quantity of milk, egg white, gelatin mixture, or, if these are not available, a large quantity of water. Avoid alcohol.

NOTE TO PHYSICIAN: Probable mucosal damage may preclude the use of gastric lavage.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with 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.

Thomson Research Associates assumes no responsibility when this product is not used in accordance with the instructions and information contained on this label.

Net Contents:

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food, or feed by storage or disposal. Store in a dry area. Keep container closed when not in use.

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

CONTAINER DISPOSAL: Completely empty liner by shaking and tapping sides and bottom to remove remaining product. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

DIRECTIONS FOR USE

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

USE IN PAINTS

Ultra-Fresh® 15 is an effective mildewcide and algicide for exterior and interior latex and solvent based paints. Use levels in paint will vary depending on the formulation and expected severity of field conditions. *Ultra-Fresh® 15* can be added at any stage of the manufacturing process. **General use:** In paint systems use 10.7-26.7 lb *Ultra-Fresh® 15* per 100 gallons of paint.

USE IN PIGMENT DISPERSIONS, INKS, EMULSIONS AND EXTENDER SLURRIES

To inhibit the growth of spoilage fungi during storage of water based suspensions and dispersions. *Ultra-Fresh® 15* will impart protection when dosed at 0.13- 1.0% (w/w). Add *Ultra-Fresh® 15* at a point in the production process where sufficient mixing will assure good suspension of the material as other ingredients are added.

USE IN ADHESIVES, CAULKS, AND SEALANTS

Ultra-Fresh® 15 is recommended for use in adhesives and binders, e.g., joint compounds, tile mastics, wall paper paste, carpet backing, air filter and foil scrim Kraft laminate; and sealants and caulks where mildew growth on the applied or stored product may be a problem. For control of mildew growth add 0.067-1.5% *Ultra-Fresh® 15* at a point in the production process where sufficient mixing will assure good suspension of the material as other ingredients are added. This Product is not cleared for use in adhesives, caulks or sealants that come in contact with food.

USE IN LEATHER TANNING

Ultra-Fresh® 15 is used in protecting chrome or vegetable tanned leather from mold and mildew during refinery wet processing and for protecting wet-bize during long storage and long transportation times. For normal protection of chrome-tanned cattle hide (based on white weight of hides) use 0.053-0.80%, for sheep hides (based on drained pickle weight) 0.21-0.3% and for goat and small skins use levels should be calculated on the dry basis of the skin weight, assuming limed weight to be 20% dry basis and pickled weight to be 33% dry basis. When long hold or export protection is required, use 0.08-0.16% for cattle, 0.29-0.5% for sheep, and on goat and small skins follow recommendations for normal protection. Use level

recommendations during retan/colour/fatiquor protection of chrome-tanned hides for all hide types are 0.4-1.2% (% on wet blue weight). In all applications, add the *Ultra-Fresh® 15* through the drum door. This should be done just prior to chrome addition or together with formate. In the case of retan/colour/fatiquor, add *Ultra-Fresh® 15* prior to the prime fatiquor feed.

USE IN WOOD PRESERVATION (For Above Ground Use Only)

Ultra-Fresh® 15 can be used for control of mildew sapstain, and wood rotting organisms at wood treatment facilities or incorporated into other registered wood preservatives. For typical end uses such as building lumber, furniture, frames, decking, fences shingles, and siding logs and poles, add *Ultra-Fresh® 15* to the water-based treatment solution with constant agitation for optimum results. Concentrations of 0.1-1.0 % (w/w active ingredient) are recommended. For dip treatments, submerge for a minimum of one minute. Spray application should use at least 0.5 % (w/w active ingredient) concentration of *Ultra-Fresh® 15*. Spray to run-off if intermittent spraying. For pressure treatment, retention levels of 0.13-2.7 lb pcf are recommended. *Ultra-Fresh® 15* can be used with other wood preservatives such as chromated copper arsenate (CCA), quaternary ammonium compounds, borates, tributyltin compounds, and zinc and copper salts at levels of 67-13000 ppm. In cases where *Ultra-Fresh® 15* is incorporated into a formulated wood preservative, follow label directions for the finished product. Do not use treated wood where there is direct contact with food, feed, potable water, livestock, or dairy animals or for surfaces likely to have repeated or prolonged skin contact. Uses where there will be direct contact with plants are not recommended. Formulators are responsible for obtaining EPA registration of formulated products.

USE IN METALWORKING FLUIDS

Ultra-Fresh® 15 is recommended for use in metalworking fluids and lubricants to prevent fungal growth. The level of *Ultra-Fresh® 15* to be incorporated into metalworking fluid concentrate will vary depending on the dilution factor recommended by the manufacturer. For efficient fungistatic activity a concentration of 600-19000 ppm of *Ultra-Fresh® 15* in the diluted fluid is suggested.

USE IN TEXTILES AND NON-WOVENS (NON-CLOTHING)

To prevent mildew growth on products such as canvas, carpet, cordage, drapes, filters, and shower curtains. Use levels depend upon the expected severity of exposure or end-use conditions. In general 3.3-33.4 lb of *Ultra-Fresh® 15* per 1000 lb of dry fabric (0.33-3.3 %) is needed. *Ultra-Fresh® 15* is best added together with the water-repellant emulsion or dye to ensure durability.

USE IN PAPER PRODUCTION

This product aids in the control of objectionable fungi on pulp, paper mills and the additive system and for the preservation of pulp, pigment dispersions, alum emulsions, adhesives, defoamers, polymers, and paper products. This product is used to inhibit fungal growth that causes discoloration, odor and degradation in paper and paperboard. This product is not cleared by the Federal Food, Drug and Cosmetic Act for use in paper, paperboard products, paper coatings and adhesives intended for use in packaging, transporting or holding food.

Additions can be made on a continuous or intermittent basis, depending upon the severity of the contamination. Badly fouled systems must be cleaned before treatment is begun. Applied at a point in the system where the product will be uniformly mixed. Intermittent or Slug Method- **Initial Dose:** When the system is

noticeably fouled add this product of pulp, or paper produced. Addition made directly at a rate of 0.026-2% until control is achieved.

Subsequent Dose: When microbial product at the rate of 0.0051-2.56 produced. Treat the system as new this product to the additive system 1000 gallons.

Continuous Feed Method - Initial noticeably fouled add this product pulp or paper produced. Addition made directly at a rate of 0.026-1% until control is achieved.

Subsequent Dose: Maintain by continuous rate of 0.0051-2.7 lb per ton of pulp

MOLD INHIBITION IN PAPER

This product is used to inhibit fungal discoloration, odor, and degradation product may be applied to the white 21.8 lb per ton of dry fibre produced pulp, this product should be applied via applicator rolls or shower at 0. produced. Application can also be box. Application is made at the rate in a solution applied to the paper surface

PRESERVATION IN PAPER

This product should be added directly prior to manufacturing into the finished broke, polymers, defoamers, emulsion coating, pigment and slurries. The material to be preserved and the storage should be 0.2 ppm active for storage and up to 250 ppm active for less conditions of spoilage the dosage 400 ppm active. The above recommendation maximum storage time of two weeks

USE IN THERMOSETTING RESINS

To protect melamine formaldehyde to manufacture high pressure conditions growth of bacteria and fungi. For *Ultra-Fresh® 15* is added at a weight of the resin. Care should be taken at temperatures higher than 200°C might occur.

EPA Reg. No. 10466-37

EPA Est No. 64776-OK-1

Ultra-Fresh® is a registered trademark

Manufactured by
Thomson Research
95 King Street
Toronto
MSC

Ultra-Fresh*

4076

PRODUCT INFORMATION SHEET

Ultra-Fresh[®] 15

Bacteriostatic-Fungistatic Liquid for Commercial Applications

E.P.A. Registration No. 10466-37

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ANTIMICROBIAL ACTIVITY FOR THERMOSETTING RESINS

Ultra-Fresh[®] 15 is an established mildewstatic and bacteriostatic agent for use in protecting melamine formaldehyde thermosetting resins used to manufacture high pressure decorative laminates against the growth of bacteria and fungi.

The low toxicity of *Ultra-Fresh*[®] 15 provides for ease of handling of both the *Ultra-Fresh*[®] 15 and the treated resins. In addition, *Ultra-Fresh*[®] 15 has a minimal effect on effluent quality. Waste disposal information on *Ultra-Fresh*[®] 15 is available on request.

Ultra-Fresh[®] 15 is added at a rate of 0.5 – 0.8% on the weight of the resin. Care should be taken not to exceed temperatures higher than 200C / 392F as some yellowing might occur.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JUL 20 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
10466-37

NOTICE

The technical information and suggestions for use made herein are based on TRA's research and experience and are believed to be reliable, but such information and suggestions do not constitute a warranty, and no patent liability can be assumed. Since TRA has no control over the conditions under which this product is transported, stored, handled, used or applied, it is TRA's intent that its liability on any basis be limited to the price of the product used.

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Ultra-Fresh*

TECHNICAL DATA SHEET

Ultra-Fresh® 15

Bacteriostatic-Fungistatic Liquid for Commercial Applications
E.P.A. Registration No. 10466-37

PRODUCT DESCRIPTION

Ultra-Fresh® 15 is a light brown, finely divided, water-based suspension, which imparts bacterial, mildew and algicidal protection to fabrics, polymeric systems, wood and leather.

PHYSICAL PROPERTIES

Ultra-Fresh® 15 is stable through a pH range of 3.0 to 10.5. In a laboratory evaluation, Ultra-Fresh® 15 was heated in water buffered to pH 9.2 at 50C / 122F for 8 days. No adverse effects were noted. Thus, the high pH values of materials such as acrylic paints present no stability problems.

- Appearance: Light brown finely divided suspension
- Boiling Point: 100C / 212F
- Freezing Point: -24C / 11F
- pH: 7.1
- Viscosity: 1612 cs at 25C / 77F
- Specific Gravity: 1.11
- Water Solubility: Solution forms a suspension in water

APPLICATION PROCEDURES

Ultra-Fresh® 15 can be used to prevent bacterial, mildew, and algal growth in the following products:

1. Latex caulks and sealants
2. Pigment dispersions
3. Chrome-tanned cattle hides
4. Wood
5. Latex paints
6. Adhesives
7. Fabrics
8. Carpets
9. Filters and Air-filters
10. Melamine formaldehyde thermosetting resins used for high pressure decorative laminates

Please refer to the appropriate "Product Information Sheet" for more details.

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HYDROLYSIS

Ultra-Fresh® 15 hydrolyses into Iodine and Toly Sulphonic acid derivatives.

pH	t _{1/2}
9.0	44 days
5.0	166 days

FIRST AID

- If Ultra-Fresh® 15 gets on the skin, wash area immediately with soap and water.
- If Ultra-Fresh® 15 gets in the eye, flush immediately with copious amounts of water and call a physician.
- In case Ultra-Fresh® 15 is ingested, drink large amounts of water and induce vomiting. Never give anything to drink or induce vomiting in an unconscious or convulsing victim. Call a physician.
- For details, see the Material Safety Data Sheet.

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