

PM 32

10466-38

1/13/2000

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 13 2000

Olivia D. Laird, Agent
Thomson Research Associates
95 King Street East, Suite 100
Toronto, Ontario, Canada
M5C1G4

SUBJECT: October 27, 1999
Ultra-Fresh NM-100
EPA Registration 10466-38

Dear Ms. Laird:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing prior to releasing for shipment.

All references to laundry detergent must be removed from your label and all technical bulletins. We will require product performance data as well as additional generic data including ecological effects and environmental fate. This use is not supported by the label that you've cited when you came in as a me-too product.

To effect this change we are accepting your label with our edits on the label and the technical bulletin.

If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "R. Brennis".

Robert S. Brennis
Product Manager (32)
Regulatory Management Branch II
Antimicrobial Division (7510-C)

cc: Yvette Hopkins, AD
File Jacket: 10466-27

Ultra-Fresh* NM-100

BACTERIOSTAT

ACTIVE INGREDIENTS

5-chloro-2-(2,4-dichlorophenoxy)phenol 99.0 %

INERT INGREDIENTS 1.0 %

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENT:

Hazard to humans and domestic animals. Harmful if swallowed. Avoid contact with eyes, skin or clothing.

STATEMENT OF PRACTICAL TREATMENT:

In case of contact immediately flush eyes or skin with plenty of water for at least 15 minutes and call a physician.

Wash skin with soap and plenty of water. Remove and wash contaminated clothing before reuse. IF

SWALLOWED: Call a physician or Poison Control Center.

Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities

of water. Avoid alcohol. IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists. IF

ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: Probable mucosal damage may contra-indicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

Manufactured for: Thomson Research Associates
95 King Street East, Suite 400
Toronto, Ontario
M5C 1G4

Ultra-Fresh* is a registered trademark of Thomson Research Associates.

STORAGE AND DISPOSAL

Prohibitions: Do not store or transport in unlined metal containers. Do not contaminate with strong oxidizing or reducing agents. Do not contaminate water, food or feed by storage or disposal or cleaning of equipment.

Pesticide Disposal: Pesticides are acutely hazardous. Improper disposal of excess pesticide 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

Metal Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

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

General: Consult Federal, state, or local disposal authorities for approved alternative procedures.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JAN 13 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended by the pesticide,

Registration No. 10466-38

lbs

2/10/99

DIRECTIONS FOR USE

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

Ultra-Fresh* NM-100 is only to be used as an additive for compounding resin formulations. For Manufacturing Use Only.

Please consult the respective Product Information Sheet for application parameters.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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.

E.P.A. Reg. No. 10466-38
E.P.A. Est. 34310-RI-01



S. H.

PRODUCT INFORMATION SHEET

Laundry uses
NOT Allowed

Ultra-Fresh* NM-100

E.P.A. Reg No. 10466-38

~~LAUNDRY ADDITIVE - BACTERIOSTATIC~~

~~Ultra-Fresh* NM-100 is a unique bacteriostatic product that can be added directly to the laundry detergent. The Ultra-Fresh* NM-100 additive preserves the freshness of laundered fabrics and helps to prolong the life of the treated fabric.~~

← delete

~~Fabrics laundered in the presence of Ultra-Fresh* NM-100:~~

- ~~(1) inhibit growth of odor-causing bacteria to ensure lasting freshness~~
- ~~(2) resist deterioration, discoloration and degradation caused by bacteria~~
- ~~(3) provide built-in freshness by imparting a residual bacteriostatic finish~~
- ~~(4) provide built-in resistance to the growth of odor-causing bacteria~~
- ~~(5) remain active providing protection to resist odors until the next washing and during the entire shelf life of the laundered linens~~

← delete

~~Ultra-Fresh* NM-100 is residually active in dry, as well as moist environments.
Ultra-Fresh* NM-100 is non-toxic and non-irritating.~~

~~Usage Levels:~~

~~Ultra-Fresh* NM-100 should be added to the laundry detergent such that 0.1 ounces (3 grams) of Ultra-Fresh* NM-100 are used for each 220 pounds (100 kg) of laundry weight.~~

← delete

NOTICE

The information and data contained herein are based on information we believe reliable. You should thoroughly test any application, and independently conclude satisfactory performance before commercialization. Suggestions of uses should not be taken as inducements to infringe any particular patent.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JAN 13 2000

October 13, 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
registered under EPA Reg. No.
10466-38



Ultra-Fresh[®]

4 2 5

TECHNICAL DATA SHEET

Ultra-Fresh[®] NM-100

E.P.A. Registration No. 10466-38
For use in the United States of America

delete all references to laundry

PRODUCT DESCRIPTION

Ultra-Fresh[®] NM-100 is a finely divided crystalline white powder designed to confer durable bacteriostatic properties to polymeric systems, ~~laundry detergents~~, and synthetic foams by inhibiting the growth of bacteria. For manufacturing use only.

not for use in laundry detergents

Ultra-Fresh[®] NM-100 can be incorporated into polymeric systems at the pre-extrusion stage in the manufacturing process through the use of a resin pellet concentrate (5% - 10% Ultra-Fresh[®] NM-100). This product, when used according to recommendations, will last the lifetime of the product. Polymeric systems include but not limited to all grades of polyolefins (polyethylenes, polypropylenes and polyolefin copolymers such as ethylene vinyl acetate, TPO's and TPR's (thermoplastic rubber)) and all styrenic thermoplastics such as but not limited to polystyrene, ABS (acrylonitrile-butadiene styrene) and SAN (styrene acrylonitrile).

PHYSICAL PROPERTIES

Melting Point..... 56 - 58 C
Freezing Point..... Not applicable
Ionic Nature..... Non-ionic
Decomposition Temperature >280 C
Vapor Pressure..... 2.0×10^{-7} mm Hg

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JAN 13 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act and the pesticide registration provisions of the Federal Insecticide, Fungicide, and Rodenticide Act.

10466-38

TOXICITY

Acute Oral LD₅₀ (rats) >5,000 mg/kg
Skin Irritation (rabbits)..... Irritant
Eye Irritation (rabbits)..... Irritant

APPLICATION PROCEDURES

1. Polymeric Systems

Ultra-Fresh[®] NM-100 will inhibit the growth of micro-organisms in polymeric systems. These include synthetic fibres (Polypropylene, Nylon, Acetate, Polyester, Rayon, Polyethylene fibres and blends of these fibres with natural fibres) moulded plastics, and synthetic foams. An application of 0.05 to 0.3% based on weight of finished product is recommended. Ultra-Fresh[®] NM-100 should be applied by adding the resin pellet concentrate to the bulk resin pellets before extrusion.

5 7 5

Ultra-Fresb[®] NM-100 - TDS
Page 2 of 2

March 19, 1999

2. Coated Textiles

Textiles coated, laminated with or constructed of polyvinyl chloride (PVC) or polyurethane (PUR), for use as mattress tickings, pillow tickings, curtains, covers and related articles for use in bio-burdened environments can be treated with **Ultra-Fresb[®] NM-100** at levels of 0.05% to 0.3% based on the weight of finished goods.

3. For more details of application, please consult the Product Information Sheet on end-uses.

PRECAUTIONS

Ultra-Fresb[®] NM-100 should be handled with care and common sense that should be accorded to all biologically active chemicals. In case of contact, remove and launder contaminated clothing before reuse. Consult the Material Safety Data Sheet for more information.

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.

ACCEPTED
with COMMENTS
EPA Letter Dated:

JAN 13 2000

General Insecticide,
Insecticide Act as
Insecticide.
Reg. No.

10466-38