UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 0 6 2001

Regina Harper Milliken Chemical, M-400 920 Milliken Road, P.O. Box 1927, Spartanburg, SC 29304-1927

Elizabeth A. Brown, Ph.D., Agent for Milliken Mailed To:

> ChemReg International, LLC 2239-H Tacketts Mill Drive Lake Ridge, VA 22192-3026

RE:

"Antimicrobial AlphaSan RC 5000"

EPA Reg. No. 11631-2

Your Amendment Dated 5/9/2001 and Re-Submission Dated 6/20/2001

Containing Revised Labels

The amendment and related re-submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to provide a revised label which updates the "First Aid" section, and adds the use site "for coatings used on the inside of fire system sprinkler pipes", and increases the maximum use rate for this use from 2% to 5%, is acceptable, with the following two comments.

- 1. This fire system sprinkler pipe use is restricted to product incorporation during manufacture. Post manufacture application is not being approved herein.
- 2. We note that the inhalation "First Aid" statement was deleted from the revised label. This is acceptable because the acute toxicity category is IV for inhalation. The inhalation statement was placed on prior accepted labels voluntarily.

A stamped copy of the accepted label is attached for your records.

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,

Marshall Swindell.

Product Manager Team 33,

Regulatory Management Branch I

	CONCURRENCES	Antimicrobials Division (75100	_)
SYMBOL			
SURNAME)			
DATE			
EDA Form 1220 14 (100)	Princed on Property CP	OFFIC	IAL FILE COPY

EPA Form 1320-1A (1/90)

Printed on Recycled Paper

Antimicrobial AlphaSan® RC 5000

An antimicrobial additive especially designed to withstand high temperatures in the manufacture of plastics, films, fibers, polymeric materials and ceramics.

Active Ingredient:

Silver sodium hydrogen zirconium phosphate* Other ingredients

99.9% 0.1%

TOTAL:

100.0%

*Contains 3.8% silver, weight/weight

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans

Causes moderate eye irritation. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling. Do not breathe dust.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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.
- Call a poison control center or doctor for treatment advice.

EPA Reg. No. 11631-2 EPA Est. 070231-JPN-002 Milliken Chemical P.O. Box 1927 Spartanburg, S.C. 29304

Net Weight 10 Kg (22 Lbs)

ACCEPTED with COMMENTS in EPA Letter Dated:

AUG 0 6 2001

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





DIRECTIONS FOR USE:

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

Antimicrobial AlphaSan® RC 5000 is an antimicrobial powder for commercial use. It is designed to be incorporated into materials during the manufacturing process to impart antimicrobial activity to manufactured products. Antimicrobial AlphaSan® RC 5000 suppresses the growth of bacteria, algae, fungus, mold and mildew. If microbial activity in the manufactured product could lead to unpleasant odors, discoloration or deterioration of the product, then such a claim may be made for the manufactured product. Manufactured products incorporating Antimicrobial AlphaSan® RC 5000 may not make any public health claims relating to antimicrobial activity without first obtaining an EPA registration for the manufactured product which permits such claims. When incorporated into manufactured products, Antimicrobial AlphaSan® RC 5000 does not protect users of any such manufactured product or others against food borne or disease causing bacteria, viruses, germs or other disease causing organisms.

Antimicrobial AlphaSan® RC 5000 may be incorporated into manufactured products listed below from 0.1% to 2.0% by weight, except as specifically noted

Food Contact Uses

Antimicrobial AlphaSan® RC 5000 may be used as an antimicrobial additive in the polymeric manufactured products listed below that are used for manufacturing, packing, packaging, transporting, handling and/or holding food if such use is not intended to have any microbial effect in the food itself. Do not incorporate Antimicrobial AlphaSan® RC 5000 into any food contact polymer unless that food contact polymer and use conditions are approved and listed in 21 CFR 174-186 (inclusive), or in the United States Food and Drug Administration's "Food Contact Substance Notification System." Any incorporation of Antimicrobial AlphaSan® RC 5000 into any food contact substance other than an approved and listed food contact polymer is prohibited.

Plastics, coatings, films and laminates: Including appliances and equipment; barrier fabrics; beverage dispensing equipment; beverage processing equipment; bottles; brush bristles; building materials and components; collection and storage equipment (including piping systems, silos, tanks and processing vessels); conveyor belts; cookware; countertops, including kitchen countertops and other countertops; cups; cutting boards; dishes; filters; food and drink containers; food handling equipment; food packaging; food processing equipment; food storage containers and bags; food trays and covers; food wrap (including coated deli paper, coated meat interleavers and plastic wrap); gaskets; general purpose containers; glazing for cement tile and for vitreous china used in plumbing fixtures such as sinks; industrial equipment; insulators; kitchen and bathroom hardware; kitchen and food processing utensils and supplies; liners; mats; mops; natural and synthetic fibers and fabrics; non-woven fabrics; packaging; paper products (wipes and tissues, towels); plastic film; plumbing supplies and fixtures; protective covers; sinks; sponges; tape; tiles; tubing; waste containers.

<u>Fibers</u>: Including table cloths; napkins; wiping cloths; mops; towels; bags; brush bristles; filters; sponges; packaging (including bags, sacks, wraps, cushion and absorbent materials, containers); conveyor belts; clothing apparel (including uniforms, outerwear, gloves, aprons, coats); kitchen, commercial and industrial wipes and fabrics; food packaging (containers and bags).

Adhesives and sealants: Including adhesives used in the manufacture of wood and plastic composites; adhesives for ceramic tile, wood, paper, cardboard, rubber and plastic; grout and joint compound; sealants for pipes; adhesives, sealants and insulating materials for appliances; plumbing adhesives; adhesives for packaging.

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

Drinking Water Contact Uses

Antimicrobial AlphaSan® RC 5000 may be used for the human drinking water contact uses listed below. The additive may be incorporated into food bowls and water bowls, dishes, and other containers used by domestic animals. Do not use for any food or drinking water applications involving non-domestic animals.

<u>Plastics: Fibers: Coatings, films, and laminates: Adhesives and sealants:</u> Including ice making equipment (water pans, piping, tubing, guards, ice storage bins, ice scoops, buckets, valves, and gaskets); drinking water contact materials (water bottles, cups, gaskets, plumbing fixtures, storage tanks, water piping, tubing, valves, spigots, coolers, water dispensing components, housing units, and water filter components).

Non-Food Contact Uses

Antimicrobial AlphaSan® RC 5000 may be incorporated into manufactured products listed below for non-food contact uses. Antimicrobial AlphaSan® RC 5000 also may be used for non-food contact uses in any manufactured product listed above for Food Contact Uses or Drinking Water Contact Uses.

Plastics, coatings, films and laminates: Including appliances and equipment; automotive and vehicular parts; barrier fabrics; brush handles; building materials and components; collection and storage equipment (including piping systems, silos, tanks and processing vessels); concrete; conveyor belts; countertops; floor covering; flooring; footwear including boots; furniture; gaskets; general purpose containers; glazing for cement tile and for vitreous china used in plumbing fixtures such as toilets, sinks, countertops; indoor and outdoor furniture; industrial equipment; insulation for wire and cable; insulators; kitchen and bathroom hardware; liners; mats; mops; natural and synthetic fibers and fabrics; non-woven fabrics; packaging; paper products (wipes and tissues, wall coverings, towels, book covers); plastic film; plumbing supplies and fixtures; protective covers; roofing shingles; shower curtains; siding; sinks; sponges; sports equipment; tape; tiles; tools; tubing; vacuum cleaner bags; wallboard; walls; waste containers. For coatings used on the inside of fire system sprinkler pipes, Antimicrobial AlphaSan RC 5000 may be incorporated at levels up to 5% by weight.

<u>Fibers</u>: Including Mattress cover pads and filling; pillow covers; sheets; blankets; fiberfill for quilts and pillows; curtains; draperies; carpet and carpet underlay; rugs; upholstery; table cloths; napkins; wiping cloths; mops: towels; bags; wall covering fabrics; cushion pads; sleeping bags; brush bristles; filters; sponges; packaging; conveyor belts; automotive and truck upholstery; carpeting; rear decks; trunk liners; convertible tops and interior liners; umbrellas; outerwear; uniforms; coats; aprons; sportswear; sleepwear; stockings; socks; hosiery; caps; undergarments; inner liners for jackets; shoes; gloves and helmets; artificial leather; book covers; cloth for sails; ropes; tents and other outdoor equipment; tarps; awnings.

<u>Adhesives and sealants</u>: Including adhesives used in the manufacture of wood and plastic composites; adhesives for ceramic tile, wood, paper, cardboard, rubber and plastic; glazing for windows; grout; sealants for pipes; adhesives; sealants and insulating materials for appliances, bathrooms, showers, kitchens, and construction; plumbing adhesives; adhesives for packaging.

Miscellaneous Manufactured Products: Toilets; sinks; tile; flooring; stucco; plaster; cat litter; drainage and sewerage pipe.

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

Questions: 1-800-345-0372 (8:00 a.m. to 5:00 p.m., Eastern time)

STORAGE AND DISPOSAL

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

Storage: Do not store in areas accessible to children. Keep containers covered during storage and away from water and excessive moisture or humidity.

Disposal: Wastes from the use of this product may be disposed of on site or at an approved waste disposal facility. Container Disposal: Completely empty bags into processing equipment where the pesticide is used. Then dispose of empty bag and box in sanitary landfill or by incineration, if allowed by state and local authorities.

WARRANTY STATEMENT

MILLIKEN CHEMICAL warrants that this product conforms to the chemical description on the label. MILLIKEN CHEMICAL makes no warranties of merchantability or fitness for a particular purpose or any other expressed or implied warranty except as stated above.

Proposed Label Revision: 05-09-2001, First Aid Statement 06-15-2001

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