

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 5 2004

Milliken Chemical Company
920 Milliken Road, M-206
Spartanburg, SC 20304

AGENT: ChemReg International, LLC
1990 Old Bridge Road, Suite 201
Lake Ridge, VA 22192-2383

Attention: Elizabeth Anne Brown

Subject: Antimicrobial AlphaSan RC 5000
EPA Registration No. 11631-2
Your Notification Dated July 6, 2004

This will acknowledge receipt of your notification to add a new indoor, non food use site, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely



Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510C)

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Antimicrobial AlphaSan® RC 5000

An antimicrobial additive especially designed to withstand high temperatures in the manufacture of plastics, films, fibers, polymeric materials and ceramics.
For Use In Formulating, Manufacturing, and Fabricating of Treated Article Products Specified in the Use Directions

* * * * *

Active Ingredient:

Silver sodium hydrogen zirconium phosphate*	99.9%
Other ingredients	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. Harmful if absorbed through the skin. Avoid contact with skin, eyes, or 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	<ul style="list-style-type: none"> • 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.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. • 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)

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 used in materials that may be incorporated into manufactured products listed below. The final article (or finished coating, for all uses requiring coating type applications) may contain from 0.1% to 2.0% by weight, except as specifically noted

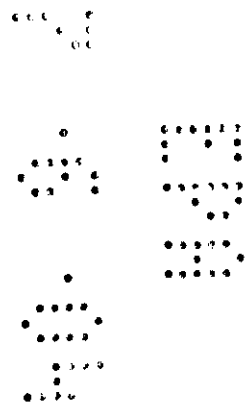
Food Contact Uses

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.

Fibers: 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.



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.

Plastics; Fibers; Coatings, films, and laminates; Adhesives and sealants: 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; writing instruments. 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.

Fibers: 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.

Adhesives and sealants: 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.

Heating, Ventilation and Air Conditioning (HVAC): equipment and related materials including air handlers, plenums, coils, fins, insulation, rigid or flexible ducts, drain pans, duct support mechanisms, diffusers, filters, heat exchangers, air purifiers, supplemental articles used in the assembly of HVAC systems such as gaskets, fixtures, sealants, adhesives, and HVAC reinforcing as well as parts and components thereof. These articles could be constructed of fibrous materials (textiles), non-woven, plastic, or coated metal material.

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.

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

Pesticide 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.

EPA Approved 06-29-2004
Notification: 07-06-2004

33

ChemReg

INTERNATIONAL, LLC

6/7

1990 OLD BRIDGE ROAD, SUITE 201
LAKE RIDGE, VIRGINIA 22192-2383

DIRECT: 703-492-7905
MAIN: 703-492-0445
Fax: 703-492-0668

E-MAIL: brown@chemreg.com
WEB SITES: www.chemreg.com
www.pesticide.net

ELIZABETH A. BROWN, PH.D.

July 6, 2004

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Attn: Mr. Marshall Swindell (PM 33)

Re: Antimicrobial AlphaSan® RC 5000 (EPA Reg. No. 11631-2)
Notification for Addition of Indoor, Non-food Site

Dear Marshall:

On behalf of our client, Milliken Chemical Company, enclosed please find a notification for the above product to add "writing instruments" as an additional indoor, non-food site. This notification is consistent with EPA PR Notice 98-10, Section II.C in all criteria specified.

Enclosed is EPA Form 8570-1, with the required certification, along with one copy of the label with the addition highlighted. Please let me know if you have any questions or need anything further.

Regards,

Elizabeth Anne Brown

Elizabeth Anne Brown

cc: Milliken Chemical Company

CONSULTANTS TO SUCCESSSM

Over One Hundred and Fifty Years of Combined Experience Assisting Chemical, Pesticide, Bio-Chemical and Life Science Companies on a Wide Range of Issues, Including Regulatory Strategies, Registration, Data Support and Compensation, Quality Assurance, Study Design and Scientific Matters.

7/7

Please read instructions on reverse before completing form

Form Approved, OMB No. 2070-0060, Approval expires 5-31-98



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 11631-2	2. EPA Product Manager M. Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Antimicrobial AlphaSan RC 5000	PM # 33	
5. Name and Address of Applicant (Include ZIP Code) Milliken Chemical Co. 920 Milliken Road, M-206 Spartanburg, SC 29304 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
Notification of Addition of Indoor, Nonfood Site for an Antimicrobial Product per PR Notice 98-10.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.45, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

1. Material This Product Will be Packaged in:				2. Type of Container	
<input type="checkbox"/> Child-Resistant Packaging Yes <input type="checkbox"/> No	<input type="checkbox"/> Unit Packaging Yes <input type="checkbox"/> No	<input type="checkbox"/> Water Soluble Packaging Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic	<input type="checkbox"/> Glass
*Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of label directions <input type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph	<input type="checkbox"/> Other _____	
			<input type="checkbox"/> Paper glued		
			<input type="checkbox"/> Stenciled		

Section IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Elizabeth Anne Brown		Title ChemReg International, LLC Authorized agent		Telephone No. (Include Area Code) 703-492-7905	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>Elizabeth Anne Brown</i>		3. Title ChemReg International, LLC Authorized Agent			
4. Typed Name Elizabeth Anne Brown		5. Date July 6, 2004			