

07/17/2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C , 20460

JUL 17 2008

OFFICE OF
PREVENTION PESTICIDES AND
TOXIC SUBSTANCES

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

Mailed to Steptoe & Johnson
 1330 Connecticut Ave , NW
 Washington, DC 200036
Attention Elizabeth Brown, Agent

Subject Antimicrobial AlphaSan RC 5000 EPA Reg No 11631-2
 Antimicrobial AlphaSan RC 2000 EPA Reg No 11631-3 ✓
 Antimicrobial AlphaSan RC 7000 EPA Reg No 11631-4
 Agency Initiated Action-Notice of Satisfaction of Time Limited
 Conditions Imposed in EPA's 11/9/00, and 9/26/02 Approval Letters

On November 9, 2000 and September 26, 2002 the products above were approved on a conditional time-limited basis for all the indirect food, drinking water, and HVAC components uses listed on the last stamped labels. The approvals allowed use of the subject products as antimicrobial additives when 1) incorporated into the specific food contact polymers listed in 21 CFR Parts 174 through 186 inclusive, or in FDA's "Food Contact Substance Notification System, 2) into certain human and animal drinking water contact treated articles, and 3) applied to HVAC components during original manufacture.

The approvals required the submission of the studies listed below to support the food, drinking water contact, uses and HVAC components during original manufacture use on the stamped labels.

- A Sub-chronic, non-rodent feeding study (830 3150)
- B Two-generation reproductive study (870 3800)

The required data were submitted, reviewed and found to be acceptable. The Agency additionally determined that the conditionally accepted uses did not pose unacceptable adverse effects to humans or the environment. Based upon these findings the Agency has determined the company has satisfied the time-limited conditions initially imposed upon the above registrations for the indirect food, drinking water, and HVAC components uses and is therefore issuing this notice to specify that the time-limited conditions initially imposed upon these approvals are no longer in effect.

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Re EPA Reg No 11631-2, EPA Reg No 11631-3, EPA Reg No 11631-4

Stamped copies of your accepted labels are enclosed for your records

If you have any questions about the comments in this letter, please feel free to contact Demson Fuller at 703-308-8062, or myself at 703-308-6341

Sincerely,

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

Antimicrobial AlphaSan® RC 2000

US Patent 5,296,238

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

Other ingredients

TOTAL

99.9%

0.1%

100.0%

Contains 10.0% 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 for reference and use in case of emergency. Call your doctor or go for treatment.

IF IN EYES Hold eye open and rinse slowly and gently with water for 15 to 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 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

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 Reg No. 11631-3

EPA Est. 11631-SC 001

Milliken Chemical

P.O. Box 1927

Spartanburg, S.C. 29304

Net Weight 10.0 Kg (22.0 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 2000 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 2000 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 a claim may be made for the manufactured product. Manufactured products incorporating Antimicrobial AlphaSan® RC 2000 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 2000 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 2000 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.

FOOD CONTACT USES

Antimicrobial AlphaSan® RC 2000 may be used as an antimicrobial additive in the polymers manufactured products listed below that are used for manufacturing, 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 2000 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 2000 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 laceries and food processing utensils and supplies liners mats nops 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 nops 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 2000 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 2000 may be incorporated into manufactured products listed below for non food contact uses. Antimicrobial AlphaSan® RC 2000 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 toilet sinks countertops indoor and outdoor furniture industrial equipment insulation for wire and cable insulators kitchen and bathroom hardware liners mats nops n 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 sliding suits sponges sports equipment tape tiles tools tubing vacuum cleaner bags wallboard walls waste containers writing instruments.

Fibers Including mattress cover pads and filling pillow covers sheets blankets floorpill for quilts and pillows curtains draperies carpet and carpet underlay rugs upholstery table cloths napkins wiping cloths nops 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.

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