

11631-3

09/10/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Steptoe & Johnson LLP
c/o for Milliken Chemical Company
1330 Connecticut Avenue, NW
Washington, DC 20036-1795

SEP 10 2012

Attention Juli Mann
Regulatory Manager

Subject Antimicrobial AlphaSan RC 2000
EPA Reg No 11631-3
Notification Letter Date August 30, 2012

This will acknowledge receipt of your notification for the aforementioned product labels, submitted under the provisions of FIFRA Section 3(c) (9) Based on a review of the submitted material, the following apply

- Revising labeling to update the container disposal statements per PR Notice 2007-4

The Notification is in compliance with PR Notice 98-10 and is acceptable This information has been made a part of your file

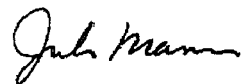
If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062

Sincerely,

A handwritten signature in black ink, which appears to read "Marshall Swindell", is written over a pre-printed line.

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

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United States EPA Environmental Protection Agency Washington DC 20460		☐ Registration ☐ Amendment ☒ Other	OPP Identifier Number
Application for Pesticide – Section I			
1 Company/Product Number 11631 3		2 EPA Product Manager Marshall Swindell	
4 Company/Product (Name) Antimicrobial AlphaSan RC 2000		3 Proposed Classification ☒ None ☐ Restricted	
5 Name and Address of Applicant (Include ZIP Code) Milliken Chemical P O Box 1927 Spartanburg S C 29304 ☒ 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			
☐ Amendment – Explain below ☐ Resubmission in response to Agency letter dated _____ ☒ Notification – Explain Below		☐ Final printed labels in response to Agency letter dated _____ ☐ Me Too Application ☐ Other – Explain Below	
Explanation Use additional page(s) if necessary (For Section I and Section II) Notification of label changes to incorporate revised container disposal statements per PR Notice 2007-4 This notification is consistent with the guidance in PR Notice 2007 4 and the requirements of EPA's regulations at 40 CFR §§ 156 10 156 140 156 144 156 146 and 156 156 No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR §§ 156 10 156 140 156 144 156 146 and 156 156 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 FORWARD CORRESPONDENCE for this action to Juh Mann, Steptoe & Johnson LLP, 1330 Connecticut Ave , NW, Washington, D C 20036			
Section - III			
1 Material This Product Will Be Packaged In			
Child Resistant Packaging ☐ Yes ☒ No	Unit Packaging ☐ Yes ☒ No	Water Soluble Packaging ☐ Yes ☒ No	2 Type of Container ☐ Metal ☒ Plastic ☐ Glass ☒ Paper ☐ Other (Specify) _____
* Certification must be submitted If Yes Unit Packaging wgt No per Container If Yes Packaging wgt No per Container			
3 Location of Net Contents Information ☒ Label ☐ Container		4 Size(s) Retail Container 10 kg bag within cardboard box	
		5 Location of Label Directions ☒ On Label ☐ On Labeling accompanying product	
6 Manner in Which Label is Affixed to Product ☐ Lithograph ☐ Other _____ ☒ Paper Glued ☐ Stenciled			
Section - IV			
1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)			
Name Juli Mann Paralegal Specialist		Title Steptoe & Johnson LLP U S Agent for Petro Canada Telephone No (Include Area Code) 202 429 3095	
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 		3 Title Regulatory Analyst Steptoe & Johnson LLP U S Agent for Petro Canada	
4 Typed Name Juli Mann		5 Date Aug 30 2012	

WRITER S DIRECT DIAL
202 429 3095

1330 Connecticut Avenue NW
Washington DC 20036 1795
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STEP TOE & JOHNSON LLP

August 30, 2012

Document Processing Desk (NOTIF)
Office of Pesticide Programs
U S Environmental Protection Agency
Room S 4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202 4501

Attention Marshall Swindell (PM Team 33)
Demson Fuller (Team 33)

Re Notification of to update container disposal statements per PR Notice 2007-4

Products Antimicrobial AlphaSan RC 5000 (EPA Reg No 11631-2)
Antimicrobial AlphaSan RC 2000 (EPA Reg No 11631-3)

Dear Marshall and Demson

On behalf of our client, Milliken Chemical Company, enclosed please find notifications for the above products to update the container disposal statements per PR Notice 2007 4 The product batch/lot number may appear on the container This is noted on the label as a bracketed statement that will not appear on the final printed label

This notification is consistent with the guidance in PR Notice 2007-4 Enclosed is EPA Form 8570 1, with the required certification statement, along with one copy of the proposed label with changes highlighted

If you have any questions, please contact me at 202-429-3095

Sincerely,



Juli Mann
Regulatory Analyst

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 99.9%
Other ingredients 0.1%
TOTAL 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 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

IF ON SKIN OR CLOTHING 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

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 Nonrefillable container Do not reuse for refilling container Completely empty bags into processing equipment where the pesticide is used Then offer for recycling if available or 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 002
Milliken Chemical
P O Box 1927
Spartanburg SC 29304

Net Weight 10.0 kg (22 lbs)

[Note to EPA Batch/Lot number may appear on container]

DIRECTIONS FOR USE

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 such 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 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 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 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 absorb materials containers) conveyor belts clothing apparel (including uniforms outerwear gloves aprons coats) kitchen commercial and industrial wipes and fabrics for packaging (containers and bags)

ADHESIVES AND SEALANTS

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) 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 may also 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 british 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 nonwoven fabrics packaging paper products (wipes and tissues towels bookcovers) 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

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 deck truck 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)

Label Revision 08 30 2012