

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 14 2007



United States
Environmental Protection
Agency

Office of Pesticide Programs

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

AGENT: Steptoe and Johnson
1330 Connecticut Avenue, NW
Washington, D. C. 20036-1795

Attention: Juli Mann
Paralegal Specialist

Subject: Antimicrobial AlphaSan RC 7000
EPA Registration No. 11631-4
Notification Dated November 15, 2007

This will acknowledge receipt of your notification for addition of an indoor, nonfood use site to the product label, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

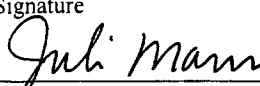
The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

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

Sincerely

A handwritten signature in cursive script, appearing to read "M. Swindell".

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

United States EPA 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 11631-4		2. EPA Product Manager Marshall Swindell	
4. Company/Product (Name) Antimicrobial AlphaSan RC 7000		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Milliken Chemical 920 Milliken Road, P.O. Box 1927 Spartanburg, SC 29304-1927 <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"/> Resubmission in response to Agency letter dated ____			
<input checked="" type="checkbox"/> Notification – Explain Below.			
<input type="checkbox"/> Final printed labels in response to Agency letter dated ____			
<input type="checkbox"/> "Me Too" Application			
<input type="checkbox"/> Other – Explain Below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Notification to add an indoor, non-food use site to the product label. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, 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 statements 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:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> 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 <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 Labeling accompanying product		6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper Glued <input type="checkbox"/> 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		Title Paralegal Specialist, Steptoe & Johnson Agent for Milliken Chemical Co.	
		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 Paralegal Specialist, Steptoe & Johnson, Agent for Milliken Chemical Co.	
4. Typed Name Juli Mann		5. Date November 15, 2007	

WRITER'S DIRECT DIAL
202.429.3095

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

November 15, 2007

Via HAND DELIVERY

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, AD Product Manager 33

Re: Notification of Addition of Indoor, Non-food Site per PR Notice 98-10

Products: Antimicrobial AlphaSan RC 2000 (EPA Reg. No. 11631-3)
Antimicrobial AlphaSan RC 7000 (EPA Reg. No. 11631-4) ✓

Dear Mr. Swindell:

On behalf of our client, Milliken Chemical Company, enclosed please find notifications for the above products to add "writing instruments," an indoor, non-food site, to the product labels. The new language is highlighted on the enclosed copy of each label. Included with this package is the Application Form (EPA Form 8570-1) as required by PR Notice 98-10.

As we discussed on the telephone yesterday, notifications to add this use site were originally approved by the Agency in 2004. However, when subsequent labels were approved by the Agency to extend certain time-limited uses on the product labels an earlier version of the label was approved resulting in the deletion of "writing instruments" from the label. The enclosed labels correct that problem. We therefore request expedited review of this notification.

We also request that these labels be added to EPA's Pesticide Product Label System (PPLS) in order to facilitate state registrations.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, 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 statements 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.

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Document Processing Desk

March 15, 2006

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

Sincerely,


Juli Mann
Paralegal Specialist

Antimicrobial AlphaSan® RC 7000

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*

31.0%

Other ingredients

69.0%

TOTAL:

100.0%

*Contains 3.1% 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: 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. 11631-4
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 7000 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 7000 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 7000 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 7000 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 7000 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 0.3% to 6.5% by weight.

FOOD CONTACT USES

Antimicrobial AlphaSan® RC 7000 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 7000 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 7000 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 7000 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 7000 may be incorporated into manufactured products listed below for non-food contact uses. Antimicrobial AlphaSan® RC 7000 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.

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)

Label Revision: 06-29-2004

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