NOV 6 2008

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



SEPA United States Environmental Protection Office of Pesticide Programs

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

AGENT: Steptoe and Johnson

1330 Connecticut Avenue, NW Washington, D. C. 20036-1795

Attention: Juli Mann

Paralegal Specialist

Subject: Antimicroial AlphaSan CW 12

EPA Registration No. 11631-5

Amendment Dated September 3, 2008

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, to add Indirect Food Contact Uses, is acceptable, provided that you:

- 1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3©(5) and sec. 4 when the Agency requires all registrants of similar products to submit such data.
- 2. Submit two (2) copies of final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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A stamped copy of the "accepted" product labeling is enclosed for your records.

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 Antimorobials Division (7510P)

Enclosure

(Front Panel Label) [optional language is shown in brackets]

Antimicrobial AlphaSan® CW 12 [Silver-Glass]

Antimicrobial AlphaSan® CW 12 is an antimicrobial powder for commercial and industrial use designed to be incorporated into various materials during varying stages of the manufacturing process to preserve the integrity of the manufactured materials.

A preservative for use in the manufacture of plastic films, interior paint, paper coatings, adhesives, and synthetic fibers

Active Ingredient

Silver* as elemental

1.8%

Other Ingredients

98.2%

Total

100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

EPA Reg. No. 11631-5 EPA Est. No. Lot Number:

Net weight:

Manufactured for: Milliken Chemical P.O. Box 1927 Spartanburg, SC 29303 EPA Letter Dated:

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

^{*} from silver-magnesium-calcium-phosphate-borate complex

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS

CAUTION: Harmful if swallowed. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your state water board or regional office of the EPA.

FIRST AID:	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
IF SWALLOWED	Immediately call a poison control center or doctor
	Do not induct vomiting unless told to do so by a poison control center or doctor
	Do not give any liquid to the person.
,	Do not give anything by mouth to an unconscious person
IF ON SKIN OR	Take off contaminated clothing
CLOTHING	• Rinse skin immediately with plenty of water for 15-20 minutes
	Call a poison control center or doctor for treatment advice
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

DIRECTIONS FOR USE

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

Blending and Formulating Instructions

Antimicrobial AlphaSan® CW 12 is [a silver glass] [an] antimicrobial powder designed to be incorporated into various materials at various stages of their manufacturing process to preserve the integrity of the manufactured materials by suppressing the growth of bacteria, algae, fungus, mildew and mold. The powder can be incorporated into the materials as an integral part of the finished products throughout their entire thickness, or as a film over the surfaces of the manufactured materials, depending on the particular method of manufacture of the finished FTED materials and needs of the manufacturer.

With COMMENTS

EPA Letter Dated:

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. **NOV.** 6 2006

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

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Finished products containing Antimicrobial AlphaSan® CW 12 may not make public health claims relating to antimicrobial activity without EPA pesticide registration. When incorporated into treated articles, this product does not protect users of any such treated article or others against foodborne or disease causing bacteria, viruses, germs or other disease causing organisms. ACCEPTED

With COMMENTS Antimicrobial AlphaSan® CW 12 may be incorporated into the following materials at the helicar Dated: specified Maximum Concentration on a dry weight basis of finished products, or on a weight by Under the Federal Insecticide, FOOD CONTACT USES: APPLICATIONS AND TYPES OF MATERIALS ed, for the pesticide Action of the pesticide, and repaired and rep Pingleide, and Rodenfielde Act as

11631-5 Antimicrobial AlphaSan® CW 12 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® CW 12 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 CW 12 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;

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grout and joint compound; sealants for pipes; adhesives, sealants and insulating materials for appliances; plumbing adhesives; adhesives for packaging

DRINKING WATER CONTACT USES

Do not exceed a maximum concentration of 1% w/w in the finished product.

Antimicrobial AlphaSan® CW 12 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.

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NON-FOOD CONTACT USES ONLY

registered under EPA Reg. No. Antimicrobial AlphaSan® CW 12 may be incorporated into manufactured products listed below for non-food contact uses. Antimicrobial AlphaSan® CW 12 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 and Films. Maximum Concentration: 1.5%. Examples of Polymers: polyester, polyamide, polypropylene, polyethylene, polisiloxane, polyethylene copolymer, polyvinyl alcohol, epoxy resin, phenol resin, polycarbonate, cellulose acetate, polystyrene, polyurethane, acrylic resin, methyl methyacrylate, acrylonitrile butadiene styrene copolymer, etc. Examples of finished products: gloves, shower curtains, cable wraps, protective covers, foam containers, brush handles, sponges, insulators, gaskets, tubings, containers, films, furniture, etc.

Paint. Maximum Concentration: 1.5%. Uses: Water base and solvent base for interior use only. Not for outdoor use.

Paper Coating: Maximum Concentration: 1.5%. Examples of paper types: cellulosic, synthetic, specialty, reinforced papers, etc. Examples of finished products: wallpaper, wiping towels, book covers, corrugated paper filters, etc.

Adhesive. Maximum Concentration: 2.0%. Uses: Adhesives for plywood manufacture, cement tile and sealants and similar uses. Not for adhesives for paper or containers that will come in contact with food products.

Fibers. Maximum Concentration: 2.0%. Examples of Polymers: polyester, polypropylene, nylon, polyethylene, acrylic, rayon, etc. Examples of products for home furnishings: mattress cover pads, sheets, blankets, quilt and pillow fiber fill, curtain and drapery, carpet and its

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underlay, upholstery, wiping cloth, towels, bags, wallcover fabrics, cushion pads, etc. Examples of products for apparel: interlinings, industrial uniforms, coats and aprons, sportswear, sleepwear, stockings, socks, helmets, caps, gloves, etc. Examples of industrial products: brush bristles, shoe linings, artificial leather, filter, book covers, sail cloth, ropes, etc.

Textile Finishing. Maximum Concentration: 0.75%. Examples of products: various surface resin coating textiles

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. This is a nonrefillable container.

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

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 a sanitary landfill or by incineration.

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.

ACCEPTED
with COMMENTS
EPA Letter Dated:

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