



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 11, 2003

Deborah A. Vercek
Regulatory Affairs Specialist
Bayer Corporation
100 Bayer Road
Pittsburgh, PA 15205-9741

Subject: Preventol O Extra
EPA Registration No. 39967-11
Application Date: January 29, 2003
EPA Received Date: January 31, 2003

Dear Ms. Vercek:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

Proposed Amendment

- Update First Aid Statements per PR Notice 2001-1

Conditions

Revise the label as follows:

1. Revise the following phrase within the Environmental Hazards Statement "...without previously notifying the sewage treatment plant authority." to read "...without previously notifying the local sewage treatment plant authority."
2. Revise the following phrase within the Pesticide Disposal section "Improper disposal of excel pesticide..." to read "Improper disposal of excess pesticide..."

CONCURRENCES

SYMBOL	7510C							
SURNAME	Gray							
DATE	4-11-03							

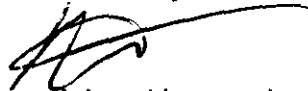
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General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three(3) copies your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)

Preventol O extra Preservative N-109

FOR THE PRESERVATION OF GLUES AND ADHESIVES, POLYMER EMULSIONS, (COATINGS, PVA SYSTEMS AND RUBBER), THICKENERS (STARCH, CELLULOSE, GUAR, ETC.) LEATHER, PAPER, TEXTILES, DYES, TEMPORARY SAPSTAIN CONTROL FOR FRESH CUT LUMBER, CONCRETE ADDITIVES/MASONRY, METALWORKING FLUIDS, INDUSTRIAL LUBRICANTS, AIR FILTER OILS, STARCHES, CLAY SLURRIES, SLURRIES, PRINTING INKS, GRAPHITE, AND HARD SURFACE TREATMENT PRODUCTS (POLISHES, WAXES AND CERAMIC GLAZES).

ACTIVE INGREDIENT: o-Phenylphenol _____ 99.9%
INERT INGREDIENTS _____ 0.1%
100%

KEEP OUT OF REACH OF CHILDREN

DANGER! HARMFUL DUST

EPA REGISTRATION NUMBER 39967-11

EPA ESTABLISHMENT NUMBER 464-MI-1 39967-DEU-01

FIRST AID:

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 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.

If swallowed: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a Poison Control center or doctor for further treatment advice.

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

Obtain and read this information before undertaking the use of this product in order to avoid process mistakes.

PERSONAL PROTECTIVE EQUIPMENT: Applicators and other handlers must wear: coveralls, over long-sleeved shirt and long pants, socks and chemical resistant footwear, goggles or face shields, chemical resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, vitron). For mixing/loading wear a chemical resistant apron.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, used detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS: Users must wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal

Pesticide Storage: Store below 122 °F (50 °C). Protect products from exposure to light and moisture.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate, is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Region Office for guidance.

Container Disposal: Completely empty bag into applications equipment. Then dispose of empty bag in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned stay out of smoke.

IN CASE OF EMERGENCY:

Bayer Corporation Pittsburgh Emergency Response Telephone Number: 412-923-1800

CHEMTREC: 800-424-9300

INTERNATIONAL: 703-527-3887

PRECAUTIONARY STATEMENT

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. DO NOT BREATHE DUST. AVOID CONTACT WITH EYES, SKIN AND CLOTHING OF EITHER DRY MATERIAL OR ITS SOLUTION. HARMFUL AND CAN BE FATAL IF SWALLOWED OR INHALED.

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 Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to the discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE. It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Detailed directions for use and on the chemical, physical and efficacy properties can be found in the accompanying technical brochure entitled "Preventol O Extra Preservative Directions for Use".

Net Contents 55 lbs. Net Wt. 1100 lbs

**BAYER CORPORATION
100 BAYER ROAD
PITTSBURGH, PA 15205-9741**

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

APR 11 2003

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 39967-11**

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Product Information

Industrial Chemicals
Division

Organic Chemicals

Preventol O extra Preservative

DIRECTIONS FOR USE

Bayer Product Code N-109
EPA Registration Number 39967-11
CAS No. 90-43-7

I. Directions for Use

Preventol O extra Preservative is effective against a wide variety of mold fungi and bacteria for the preservation of glues and adhesives, polymer emulsions (coatings, PVA systems and rubber), thickeners (starch, cellulose, guar, etc.), paper, textiles, dyes, temporary sapstain control for fresh cut lumber, concrete additives/masonry, metalworking fluids, air filter oils, starches, clay slurries, slurries, printing inks, graphite, and hard surface treatment products (polishes, waxes and ceramic glazes).

The following guidance is given as an approximation for each use pattern, but field testing is recommended to achieve optimum effectiveness.

Glues and Adhesives

Preventol O extra Preservative can be dissolved in suitable solvent systems such as ethanol or 1,2-propanediol, or an alkaline homogeneous concentrate can be prepared and added to the substrate for the effective preservation of glues and adhesives. Preventol O extra Preservative can be directly mixed until homogeneous into dry glues before they are concentrated.

Recommended Dosages:

Bone Glues	0.10 - 0.15%
Skin Glues	0.15 - 0.40%
Leather Glues	0.15 - 0.40%
Fish Glues	0.15 - 0.40%
Casein-Containing Adhesives	0.20 - 0.40%
Gelatin-Based Glues	0.15 - 0.30%
Albumin-Containing Glues	0.20 - 0.40%
Starch-Based Glues (Liquid)	0.10 - 0.25%
Starch-Based Glues (Solid)	0.15 - 1.00%
Polymer Dispersion-Based Adhesives	0.10 - 0.30%
Dextrin-Based Adhesives	0.10 - 0.30%
Cellulose-Based Adhesives	0.10 - 0.30%
Plant Glues	0.10 - 0.25%

Stains and Paints

Preventol O extra Preservative is generally incorporated directly into pigments and fillers, but it can also be first dissolved in a suitable solvent or added directly to the pre-heated binder systems. For best results, the preservative should be homogeneously incorporated into the stain or paint. Discoloration may occur, and should be evaluated.

Recommended Dosages:

Latex-Based Systems	0.15 - 0.25%
Casein-Systems	0.20 - 0.40%
Oil-Containing Systems	0.25 - 0.50%
Alkyd Resin-Based Systems	0.25 - 0.50%
Synthetic Resin Dispersions	0.10 - 0.25%

Leather

Pickle solutions and pickled hides	0.15 - 0.25%
Chrome leather (calculated on pelt weight)	0.10 - 0.25%
Leather pasting adhesives	0.05 - 0.10%
Leather pigment finishes	0.20 - 0.40%

Preventol O extra Preservative may be dissolved in five times the amount of alcohol and then stirred into pickle solutions. In the case of chrome leather, an effective protection against mold attack may be obtained without additional labor by stirring Preventol O extra Preservative together with soda into the basifying solution, since Preventol O extra Preservative dissolves freely in the alkaline solution.

The oil-soluble Preventol O extra Preservative can also be dissolved in the fat liquor and applied in the drum simultaneously. Finished vegetable-tanned leathers and chrome leathers may also be protected against mold attack by a treatment on both sides of the material with an 0.2 - 0.4% solution of Preventol O extra Preservative.

Textiles

Preventol O extra Preservative should be dissolved in suitable solvents such as ethanol, 1,2-propanediol, mineral spirits, or paraffins or can be converted to a water dilutable alkaline concentrate and applied directly to the textile normally by dipping or spraying. The preservative is affixed to the fiber with a suitable acid like acetic acid. For the preservation of auxiliaries. Preventol O extra Preservative is diluted in solvents as mentioned above or is homogeneously distributed with the aid of alkaline solutions or emulsion concentrates. Print thickeners are preserved by adding Preventol O extra Preservative directly to the emulsion or homogeneously metered directly into the dried product. Milling may be necessary in order to obtain consistent particulate sizes.

Recommended Dosages:

Awnings and Tarpaulins	0.50 - 5.0%
Geotextiles	0.50 - 5.0%
Shower Curtains	0.50 - 2.0%
Jute, Sisal	0.50 - 2.5%
Felts	0.50 - 2.5%
Carpets	0.50 - 2.0%
Upholstery	0.50 - 2.0%
Cotton Production	0.50 - 1.5%
Wool Production	0.50 - 1.5%
Fire Hoses	1.0 - 3.0%
Auxiliaries (Sizing Agents, Finishing Agents, Spinning Preparations, Wetting Agents) . . .	0.05 - 0.25%

Temporary Sapstain Control for Fresh Cut Lumber and Other Lumber

Preventol O extra Preservative is converted to alkaline liquid and water dilutable formulations by adding sodium hydroxide or other bases or by preparing emulsion concentrates of Preventol O extra Preservative. Auxiliaries may also be added. For the temporary protection of freshly sawn lumber against staining and molding, Preventol O extra Preservative solutions as prepared above are applied to the freshly sawn lumber by either dipping or spraying.

Recommended Dosages:

Fresh Cut Lumber	1.0 - 4.0%
Fruit and Vegetable Containers	1.0 - 3.0%
Pallets	1.0 - 3.0%
Construction Woods	1.0 - 4.0%

Dyes, Pigments and Filler Suspensions

Preventol O extra Preservative should be evenly mixed with dispersing agents for processes where the temperature does not exceed 100°C. For all other processes, Preventol O extra Preservative is metered directly into the material to be preserved during the cooling step after the temperature falls below 50°C and homogeneously distributed by stirring.

Recommended Dosages:

Clay Slurries	0.05 - 0.20%
Kaolin Slurries	0.05 - 0.20%
Calcium Carbonate Slurries	0.05 - 0.20%
Iron Oxide Pigment Slurries	0.05 - 0.20%
Carbon Black Pigment Slurries	0.05 - 0.20%
Titanium Dioxide Pigment Slurries	0.05 - 0.20%
Organic Dyes and Pigment Slurries	0.05 - 0.20%
Starch Slurries	0.05 - 0.30%
Other Filler Suspensions	0.05 - 0.30%

Polymer Dispersions and Emulsions

Preventol O extra Preservative is added immediately after the preparation of the polymer dispersion or emulsion during the cooling process. Losses of active ingredient caused by elevated temperatures should be avoided. For homogeneous distribution, Preventol O extra Preservative should be dissolved in suitable solvents such as ethanol, 1,2-propanediol, water dilutable alkaline solutions then added to emulsion concentrates or polymer dispersions.

Recommended Dosages (Polymer Dispersions and Emulsions:)

Acrylic-Systems	0.05 - 0.30%
Polyvinylacetate (PVA) Systems	0.05 - 0.30%
Vinyl/Acrylic-Based Systems	0.05 - 0.30%
Styrene Butadiene Systems	0.05 - 0.30%
Polyester-Based Systems	0.05 - 0.30%
Polyurethane-Based Systems	0.05 - 0.30%
Other Polymer Dispersions	0.05 - 0.30%

Lubricoolants and Mineral Oil Based Products

Preventol O extra Preservative is dissolved in the necessary amount of mineral oil, auxiliary (for example dispersing agent), solvents such as Ethanol, Glycols or water dilutable alkaline concentrates, and added to form a homogeneous mixture in the substrates (metalworking fluids, etc.,) by stirring.

Recommended Dosages:**Mineral Oil-Based Products**

Cooling Fluids - Concentrate	1.0 - 5.0%
Ready for Use	0.05 - 0.25%
Boring and Cutting Oils	0.05 - 0.20%
Fuel Oils	0.02 - 0.15%
Hydraulic Oils	0.05 - 0.25%

Non-Mineral Oil-Based Products

Cutting Oils	0.05 - 0.30%
Cooling Fluids	0.05 - 0.30%

Other Applications

Recommended Dosages:

Concrete and Masonry Additives	0.10 - 0.30%
Biopolymers (e.g. Xanthan)	0.05 - 0.20%
Fire Extinguishing Medium	0.10 - 0.30%
Photographic Gelatins	0.05 - 0.25%
Tints	0.05 - 0.20%
Cleaning Solutions	0.05 - 0.40%
Wax Emulsions	0.05 - 0.40%
Plasters	0.10 - 0.50%
Chemical Cleaning Solutions	0.02 - 0.15%
Concrete	0.10 - 0.50%
Caulking Materials	0.10 - 0.50%
Rubber Systems	0.20 - 1.00%
Ceramic Glazes	0.10 - 0.50%
Polishes	0.05 - 0.20%
Paper Auxiliaries	0.05 - 0.30%
Paper Slurries	0.07 - 0.10%

II. Pesticide Storage And Disposal

Pesticide Storage

Keep containers tightly and securely closed. Do not contaminate water, food or feed by storage and disposal. Store below 122°F (50°C). protect from exposure to light and moisture. The product has a shelf life of at least two years if protected from light and moisture. The flakes agglomerate if the storage temperature is too high. See Bayer Material Safety Data Sheet N-109 for additional instructions.

Pesticide Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Health and Safety Information

Appropriate literature has been assembled which provides information pertaining to health and safety concerns that must be observed when handling Bayer products, appropriate industrial hygiene and other safety precautions recommended by their manufacturer should be followed. Before working with any product mentioned in this publication, you must read and become familiar with available information concerning its hazards, proper use and handling. This cannot be overemphasized. Information is available in several forms, such as Material Safety Data Sheets and Product Labels. Consult your Bayer Representative or contact the Product Safety Manager for the Industrial Chemicals Division within Bayer's Product Safety and Regulatory Affairs Department.

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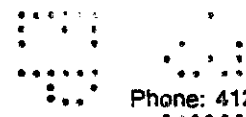
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