



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 23, 2014

Marcia L. Croce
Regulatory Affairs Specialist
Material Protection Products, Regulatory Affairs
Lanxess Corporation
111 RIDC Park West Drive
Pittsburgh, PA 15275-1112

Subject: Label Amendment - Remove Notice to Buyer and Update Emergency Contact
Product Name: P-1 Preservative Solution
EPA Registration Number: 39967-104
Application Date: October 28, 2014
Decision Number: 496890

Dear Ms. Croce:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Tom Luminello by phone at (703) 308-8075, or via email at Luminello.Tom@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Chao". The signature is fluid and cursive, with the first name "Julie" being more prominent.

Julie Chao, Acting Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

P-1® PRESERVATIVE SOLUTION

FOR THE PRESERVATION OF GLUES AND ADHESIVES, POLYMER EMULSIONS, (COATING, 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*, AIR FILTER OILS*, STARCHES, CLAY SLURRIES, SLURRIES, PRINTING INKS, GRAPHITE, AND HARD SURFACE TREATMENT PRODUCTS (POLISHES, WAXES AND CERAMIC GLAZES).

Active Ingredient:

Sodium Orthophenylphenate	20.0%
Inert Ingredients:	80.0%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN
DANGER

EPA Registration No. 39967-104

EPA Est. No.:

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER CORROSIVE: Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

If Swallowed: Call a 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 in Eyes: Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 15 minutes, then continue rinsing eyes. Call a poison control center or doctor for treatment advice.

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

If on Skin or Clothing: Take off contaminated clothing. Rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

ENVIRONMENTAL HAZARDS

This product 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 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.

ACCEPTED

12/23/2014

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 39967-104

Personal Protective Equipment PPE:

Applicators and other handlers must wear: coveralls over long sleeved shirt and long pants; socks and chemical-resistant footwear; goggles or face shield; chemical resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, PV, or viton).

User Safety Recommendations

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

PHYSICAL OR CHEMICAL HAZARDS: Corrosive to skin and eyes.

DIRECTIONS FOR USE

General Precautions and Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through dirt. Only protected handlers may be in the area during application. It is a violation of federal law to use this product in a manner inconsistent with its labeling. The following guidance is given as an approximation for each use pattern, but field testing is recommended to achieve optimum effectiveness.

ADHESIVES AND GLUES

P-1® Preservative Solutions 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. P-1® Preservative Solution can be directly mixed until homogeneous into to dry glues before they are concentrated.

Recommended Dosages:

Albumin-Containing Glues	1.1 - 2.3%
Bone Glues	0.6 - 0.9%
Casein-Containing Adhesives	1.1 - 2.3%
Cellulose-Based Adhesives 0.6 - 1.7%	
Dextrin-Based Adhesives	0.6 - 1.7%
Fish Glues	0.2 - 2.3%
Gelatin-Based Glues	0.9 - 1.7%
Leather Glues	0.2 - 2.3%
Plant Glues	0.6 - 1.4%
Polymer Dispersion-Based Adhesives	0.6 - 1.7%
Skin Glues	0.9 - 2.3%
Starch-Based Glues (Liquid)	0.6 - 1.4%
Starch-Based Glues (Solid)	0.9 - 5.7%

HOUSEHOLD PRODUCTS & CONSTRUCTION PRODUCTS

Recommended Dosages:

Biopolymers (e.g. Xanthan)	0.3-1.1%
Caulking Materials	0.6 - 2.8%
Ceramic Glazes	0.6 - 2.8%
Chemical Cleaning Solutions.....	0.1 - 0.8%
Cleaning Solutions	0.3 - 2.3%
Concrete	0.6 - 2.8%
Concrete and Masonry Additive.....	0.6 - 1.7%
Fire Extinguishing Medium	0.6 - 1.7%
Photographic Gelsatins	0.3 - 1.4%
Plasters	0.6 - 2.8%
Polishes	0.3 - 1.1%
Rubber Systems	0.1 - 5.7%
Tints	0.3 - 1.1%
Wax Emulsions	0.3 - 2.3%

Paper

Paper Auxiliaries	0.28 - 1.7%
Paper Slurries	0.4 - 0.6%

LEATHER TANNING

P-1® Preservative Solution 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 P-1® Preservative Solution together with soda into the basifying solution. 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 1.13 - 2.26% solution of P-1® Preservative Solution.

Recommended Dosages:

Chrome leather (calculated on pelt weight)	0.6 - 1.4%
Leather pasting adhesives	0.3 - 0.6%
Leather pigment finishes	1.2 - 2.3%
Pickle solutions and pickled hides.....	0.9 - 1.4%

METAL WORKING FLUIDS, LUBRICOLANTS AND MINERAL OIL BASED PRODUCTS *

Recommended Dosages:

Mineral Oil-Based Products

Boring and Cutting Oils	0.3 - 1.1%
Cooling Fluids - Concentrate	5.7 - 28.3%
Ready for Use	0.3 - 1.4%
Fuel Oils	0.1 - 0.8%
Hydraulic Oils	0.3 - 1.4%
Non-Mineral Oil-Based Products	
Cooling Fluids	0.3 - 1.7%
Cutting Oils	0.3 - 1.7%

PAINTS, COATINGS & STAINS

P-1® Preservatives Solution 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:

Alkyd Resin-Based Systems	1.4 - 2.8%
Casein-Systems	1.1 - 2.3%
Latex-Based Systems	0.9 - 1.4%
Oil-Containing Systems	1.4 - 2.8%
Synthetic Resin Dispersions	0.6-1.4%

PIGMENTS, DYES AND FILLER SUSPENSIONS

P-1® Preservative Solution should be evenly mixed with dispersing agents for processes where the temperature does not exceed 100° C. For all other processes, P-1® Preservative Solution 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:

Calcium Carbonate Slurries.....	0.3 - 1.1%
Carbon Black Pigment Slurries	0.3 - 1.1%
Clay Slurries	0.3 - 1.1%
Iron Oxide Pigment Slurries.....	0.3 - 1.1%
Kaolin Slurries	0.3 - 1.1%
Organic Dyes and Pigment Slurries	0.3 - 1.1%
Other Filler Suspensions	0.3 - 1.7%
Starch Slurries	0.3 - 1.7%

POLYMER DISPERSIONS AND EMULSIONS

P-1® Preservative Solution 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.

Recommended Dosages (Polymer Dispersions and Emulsions):

Acrylic-Systems	0.3 - 1.7%
Other Polymer Dispersions	0.3 - 1.7%
Polyester-Based Systems	0.3 - 1.7%
Polyurethane-Based Systems	0.3 - 1.7%
Polyvinylacetate (PVA) Systems	0.3 - 1.7%
Styrene Butadiene Systems	0.3 - 1.7%
Vinyl/Acrylic-Based Systems	0.3 - 1.7%

TEXTILES *

P-1® Preservative Solution 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 alkali like acetic acid. For the preservation of auxiliaries, P-1® Preservative Solution is diluted in solvents added directly to textile. Print thickeners are preserved by adding P-1® Preservative Solution 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:

Auxiliaries (Sizing Agents, Finishing Agents, Spinning Preparations, Wetting Agents)	0.1 - 0.3%
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Awnings and Tarpaulines	2.8 - 28.3%
Carpets	2.8 - 11.3%
Cotton Production	2.8 - 8.5%
Felts	2.8 - 14.1%
Fire Hoses	2.8 - 17.0%
Geotextiles	2.8 - 28.3%
Jute, Sis	2.8 - 14.1%
Shower Curtains	2.8 - 11.3%
Upholstery	2.8 - 11.3%
Wool Production	2.8 - 8.5%

WOOD PRESERVATION *

For the temporary protection of freshly sawn lumber against staining and molding, P-1® Preservative Solutions are applied to the freshly sawn lumber by either dipping or spraying.

Recommended Dosages:

Construction Woods	5.7 - 22.6%
Fresh Cut Lumber	5.7 - 22.6%
Fruit and Vegetable Containers.....	5.7 - 17.0%
Pallets	5.7 - 17.0%

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. **PESTICIDE STORAGE:** Keep containers tightly closed and securely closed. Store below 122°F (50°C).

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 the 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

Nonrefillable container: Do not reuse or refill this container.

Triple rinse as follows: Empty remaining contents into application equipment or mix tank. Tip container on its side and roll back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip back and forth several times. Turn container over onto its other end and tip it back and forth several times. Empty rinsate into application equipment or mix tank or store rinsate into the application equipment or mix tank or store for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

IN CASE OF TRANSPORTATION EMERGENCY CALL:

CHEMTREC 1-800-424-9300.

**The LANXESS Pittsburgh Emergency Response
Telephone Number is: 1-800-410-3063**

*Not approved for this use in the State of California

LOT NO.: _____

NET WEIGHT: _____ LBS / GALS.

LANXESS

energizing Chemistry

LANXESS Corporation
111 RIDC Park West Drive
Pittsburgh, PA 15275-1112

Label Date: 10/28/14