

57978-4

01/15/2009

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



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

JAN 15 2009

ISP Chemicals LLC  
Route 95 Industrial Area  
P. O. Box 37  
Calvert City, KY 42029

Attention: Sangeeta V. Khattar

Subject: Suttocide A 50% Solution  
EPA Registration No. 57978-4  
Notification Dated December 31, 2008

This will acknowledge receipt of your notification to incorporate non-pesticidal marketing language to the 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 the file.

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

Sincerely

A handwritten signature in black ink, appearing to read "M. Swindell".

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

**EPA**

United States  
Environmental Protection Agency  
Washington, DC 20460

- ☐ Registration  
☐ Amendment  
☒ Other: Notification

OPP Identifier Number  
265394

**Application for Pesticide - Section I**

1. Company/Product Number 57978-4	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Suttocide A 50% Solution	PM# Team 33	
5. Name and Address of Applicant (Include ZIP Code) ISP Chemicals LLC Route 95 Industrial Area P. O. Box 37 Calvert City, KY 42029 <b><u>PLEASE DIRECT ALL CORRESPONDENCE TO</u></b> <b><u>"CONTACT POINT" LISTED BELOW</u></b> <input type="checkbox"/> Check if this is a new address		6. <b>Expedited Review.</b> 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. ☐ Final printed labels in response to Agency letter dated \_\_\_\_\_  
☐ Resubmission in response to Agency letter dated \_\_\_\_\_ ☐ "Me Too" Application  
☒ Notification - Explain below. ☐ Other - Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)**Notification to Incorporate Non-Pesticidal Language in Accordance With PR Notice 98-10**

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 statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: Sangeeta V. Khattar /ark Date: 12/31/08

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
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	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)		
* <b>Certification must be submitted</b> If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package 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"/> Other _____ <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: Sangeeta V. Khattar	Title: FIFRA Regulatory Supervisor	Telephone No. (Include Area Code): (373) 628-4109
<b>Certification</b> 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.		5. Date Application Received (Stamped)
2. Signature <u>Sangeeta V. Khattar /ark</u>	3. Title: FIFRA Regulatory Supervisor	
4. Typed Name Sangeeta V. Khattar	5. Date 12/31/2008	

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**INTERNATIONAL SPECIALTY PRODUCTS**

1361 Alps Road Wayne NJ 07470

(973) 628 4000



December 31, 2008

Document Processing Desk [NOTIF]  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

**ATTENTION: Marshall Swindell**  
**Product Manager, Team 33**

**SUBJECT: International Specialty Products (ISP)**  
**Suttocide A 50% Solution (EPA Reg. No. 57978-4)**  
**Notification per PR Notice 98-10**

Dear Mr. Swindell:

On behalf of ISP Chemicals LLC, I am submitting an application for pesticide notification to incorporate non-pesticidal marketing language to the label for **Suttocide A 50% Solution (EPA Reg. No. 57978-4)**.

In support of this notification, I am submitting the following documents for your review:

1. Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
2. One (1) copy of the proposed product label with the changes highlighted; and,
3. One (1) clean copy of the proposed 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 for 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.

Thank you in advance for your assistance with this notification. If you have any questions, please call me at (973) 628-4109 or e-mail me at SKhattar@ispcorp.com.

Sincerely,

A handwritten signature in cursive script, reading 'Sangeeta V. Khattar' followed by a stylized 'SK' monogram.  
Sangeeta V. Khattar  
FIFRA Regulatory Supervisor

Enclosures

**Suttocide A 50% Solution (EPA Reg. No. 57978-4)**  
**Notification per PR Notice 98-10**

# SUTTOCID A 50% SOLUTION

## PRECAUTIONARY STATEMENTS

### HAZARD TO HUMANS AND DOMESTIC ANIMALS

**WARNING:** Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Wear goggles and gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco products. Remove contaminated clothing and wash before reuse.

## ENVIRONMENTAL HAZARDS

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.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. This product is not cleared for use in paper or adhesives which may come into contact with food. INTEGRA 44 should not be used in products where prolonged human dermal contact is expected or which may come in direct contact with food.

Products containing INTEGRA 44 may not make claims of antimicrobial activity other than protection of the article itself against growth of bacteria and mold in the treated article. If growth of bacteria and fungi in the treated article would lead to unpleasant odors and discoloration of the treated article, then such a claim may be made.

INTEGRA 44 is a biocidal agent used to inhibit the growth of bacteria and fungi. It is for indoor commercial and industrial use and is generally effective at concentrations of 0.1% to 0.5% (2 to 10 gallons of INTEGRA 44 per 1,000 gallons of the product being treated. This will yield 1,000 to 5,000 ppm of active ingredient). The concentration of INTEGRA 44 necessary for adequate preservation will depend on a variety of factors including the use of other raw materials which may provide nutrients for bacterial growth. To determine more precise application rates, all products should be subject to microbial challenge testing.

\*These use application are not approved for use in California.

## A Broad Spectrum Preservative and Biocide

### ACTIVE INGREDIENT-

Sodium Hydroxymethylglycinate..... 50.0%

INERT INGREDIENTS..... 50.0%

TOTAL: 100.0%

## WARNING

### KEEP OUT OF REACH OF CHILDREN

#### FIRST AID

IF IN EYES:	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes, then continue rinsing eye. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF SWALLOWED:	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

EPA Reg. No.57978-4 EPA Est. No. 57978-NJ-01

SUTTOCID A 50% SOLUTION IS AN INDUSTRIAL MICROBIOCID FOR USE IN AQUEOUS COMPOSITIONS, SUCH AS LIQUID SOAPS\*, FABRIC CLEANING & CARE PRODUCTS\*, WATER-BASED CLEANING PRODUCTS, WATERBORNE COATINGS, WATER-BASED ADHESIVES, PRINTING SUPPLIES, POLISHES\* AND TEXTILE EMULSIONS.

## STORAGE AND DISPOSAL

**STORAGE:** Store in a secure area at temperatures between 45°F and 85°F.

**PESTICIDE DISPOSAL:** Do not contaminate water, food, or feed by storage and disposal. Wastes resulting from the use of this product may be disposed of on site or at an appropriate waste disposal facility.

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

Manufactured by:  
**ISP CHEMICALS LLC**  
Route 95 Industrial Area  
P.O. Box 37  
Calvert City, KY 42029