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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JAN 21 2010

Ms. Colleen Snyder  
VERICHEM  
3499 Grand Avenue  
Pittsburgh, PA 15225

Subject: P1 Preservation Solution  
EPA Registration No.: 67869-24  
Notification Date: November 25, 2009  
EPA Receipt Date: December 22, 2009

Dear Ms. Snyder,

This letter acknowledges receipt of your notification submitted under the provision of FIFRA section 3(c)9 and PR Notice 98-10.


**Proposed Notification**

Response to Agency letter dated July 14, 2009

**General Comments**

Based on a review of the submitted materials, your notification to correct Container Disposal Statement per Agency letter dated July 14, 2009 is acceptable and a part of the records on file.

Should you have any questions or comments concerning this letter, please contact Stacy Grigsby at (703) 308-6440 or Jacqueline Campbell-McFarlane at 703-308-6416.

Sincerely,  
  
Jacqueline Campbell-McFarlane  
Acting Product Manager (PM-34)  
Regulatory Management Branch 2  
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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**VERICHEM**

3499 Grand Avenue • Pittsburgh, PA 15225  
Tel. (412) 331-7299 • Fax (412) 331-7884

November 25, 2009

Ms. Tracy Lantz  
Product Manager #34  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
US Environmental protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington VA 22202-4501

RE: Deficiency Response to Your Letter Dated July 14, 2009. Notification PR Notice 98-10 (II)(G) Labeling Notification; Storage and Disposal Statements for an Antimicrobial Product. P1 Preservative Solution (EPA Reg. # 67869-24)

Dear Ms. Lantz:

Enclosed you will find documentation to respond to your deficiency letter dated July 14, 2009 to correct the proper container disposal statement for Non-Refillable containers as per PR Notice 2007-4 and PR Notice 98-10 (II)(G) for an Antimicrobial Product, P1 Preservative Solution (EPA Reg. #67869-24). There have been no additional changes made to this label. Specifically enclosed for you consideration is:

- One (1) copy of EPA letter dated July 14, 2009
- One (1) copy of the proposed product label

My best,

Colleen M Snyder  
Manager of Regulatory Affairs  
enclosures

# 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, FLURRIES, PRINTING INKS, GRAPHITE, AND HARD SURFACE TREATMENT PRODUCTS (POLISHES, WAXES AND CERAMIC GLAZES).

**Active Ingredient:**  
Sodium Orthophenylphenate ..... 20.0%  
**Other Ingredients:** ..... 80.0%  
**Total** ..... 100.0%

KEEP OUT OF REACH OF CHILDREN  
**DANGER**

EPA Registration No. 67869-24  
EPA Est. No.: 67869-PA-01

## 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, 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.

### 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 drift. 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 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 Gels	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 poll 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® Preservative 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%
VinylAcrylic-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 acid 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%
Awning 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%
Upsttery	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 container 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 rinse 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

Non-refillable container: Do not reuse or refill this container.  
Triple rinse as follows: Empty container completely 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 roll back and forth several times. Turn container over onto its other end and tip it back and forth several times. Empty rinse into application equipment or mix tank or store rinse 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.

### NOTICE TO BUYER

Buyer assumes all risks of use and handling which are at variance in any way with the directions herein. There are no quantities, which extend beyond the description on this label.

**NONWARRANTY:** Seller (whether manufacturer, distributor or other) makes no warranty express or implied, including the implied warranty of merchantability, regarding this product except the composition as set forth in the ingredient statement herein, and shall not be liable for special or consequential damages, the exclusive remedy being replacement of the product. Buyer or user assumes all risk of possession, handling or use of this material when such use and/or handling is contrary to label instructions.

LOT NO.:

NET WEIGHT: \_\_\_\_\_ LBS / GALS.

Made in U.S.A.



**VERICHEM**

SOLD BY:

**VERICHEM INC.**  
3499 Grand Avenue  
Pittsburgh, PA 15225  
412-331-7299

Final Approval 7-11/09

**NOTIFICATION**  
Date Reviewed: 11/21/09  
Reviewed By: J. W. Malone  
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