

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 23 1997

Sangi Group America, Inc.
22554 Ventura Blvd., #127
Woodland Hills, CA 91364

ATTN: Tomoki Saito, Director

SUBJECT: APACIDER - AW
EPA Reg. No. 68317-2
APACIDER - A25
Amendments of April 24, 1996

Dear Mr. Saito:

The Confidential Statements of Formula for each product are acceptable. They are in compliance with PR Notice 91-2 and agree with the labels.

Please note that certified limits for the active ingredients are somewhat excessive and they should be narrowed.

The labels referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, are acceptable subject to the comments listed below. A stamped copy of the labeling is enclosed for your records.

- Under the "Container Disposal" heading: Change the word "ring" to "rinse" on both sets of labels.

If you have any further questions, please contact Ms. Barbara Pringle at (703) 308-6236.

Sincerely,

Marshall Swindell
Acting Product Manager 31
Regulatory Branch I
Antimicrobial Division (7505W)

CONCURRENCES

SYMBOL	7505W						
SURNAME	Pringle						
DATE	4-31						

2084

(Front Panel Label)

APACIDER - A25

APACIDER-A25 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 preservatives for use in the manufacture of plastic films, paint (interior), paper coating, adhesive, synthetic fibers and pigments. For more details of the various materials refer to the supplemental labeling for uses of Apacider - A25.

ACTIVE INGREDIENT:

Silver as elemental 2.03%

INERT INGREDIENTS: 97.97%

Zinc Calcium Phosphate and Silica

ACCEPTED
with COMMENTS
to EPA Letter #1084

APR 23 1997

KEEP OUT OF REACH OF CHILDREN
CAUTION

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, the pesticide registered under FIFRA, 40 CFR 155.55

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

68317-3

CAUTION: May be harmful if swallowed. Avoid contact with skin, eyes, or clothing. Avoid contamination of cooking utensils and food preparation surfaces. Causes eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT: If swallowed, drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician or poison control center. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin, remove contaminated clothing and wash affected area with soap and water. If irritation persists, contact a physician. If in eyes, flush eyes for at least 15 minutes with water. If irritation persists contact a physician.

ENVIRONMENTAL HAZARDS: This pesticide may be toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically indentified and addressed in NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment authority. For guidance contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL, Pesticide Disposal: Pesticide wastes are toxic. 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 (Paper / Bags): Completely empty bag into application 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.

Container Disposal (Plastic): Triple ring (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.

MANUFACTURED BY
SANGI AMERICA, INC.
22554 VENTURA BLVD, #127
WOODLAND HILLS, CALIFORNIA 91364

EPA REG. NO. 68317-3
EST. NO. 68317-JP-001
NET CONTENT : 20 kg

APACIDER - A25

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
FOR THE LISTED MATERIALS

APACIDER - A25 is a silver, zinc calcium phosphate with silica, antimicrobial powder designed to be incorporated into various materials at various stages of their manufacturing process to preserve the integrity of the manufactured materials. 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 materials and need of the manufacturer.

APACIDER - A25 may be incorporated into the following materials at the specified Maximum Inhibitory Concentrations (MIC) on a dry weight basis of finished products.

<u>APPLICATION</u>	<u>MIC</u>
Plastic Film: Non - food use only and no water pipes, polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester	20.00 %
Paint: (Water base and solvent base) For interior surfaces & furniture	5.00 %
Paper Coating: (non food packaging paper, no food contact) Cellulose, synthetic, specialty, reinforced, not for paper production use.	3.00 %
Adhesives: (non food, contact): Natural and synthetic Adhesives	3.00 %
Plastic Fibers: Polyethylene, polyester, nylon, acrylic and polypropylene	20.00 %
Plastic Sheets: Melamine, epoxy resin, phenol resin, polycarbonate, polyurethane, acrylic resin, methylmethacrylate, acrylonitrile butadiene styrene copolymer and polyvinyl acetate, polyvinyl chloride and polyethylene terephthalate	20.00 %
Textile Finishing and Manufacturing	3.00 %
Non - Woven: Polypropylene, polyethylene, polyester, polyvinyl chloride and nylon	20.00 %
Flexible Tubing: Silicon rubber, polyvinyl chloride, polyethylene	20.00 %

For details in blending APACIDER - A25 with these materials refer to supplemental labeling.

4084

SUPPLEMENTAL LABELING

APACIDER - A25

Claims : APACIDER - A25 is to be incorporated into the following materials at suitable stages of the manufacturing process to impart antimicrobial activity to the treated materials, and thus make them suppress the growth of bacteria and mold responsible for unpleasant odors and discoloration of the treated materials.

Fibers : Polyester, polypropylene, nylon, polyethylene, acrylic, rayon

Applications :

Home Furnishings : mattress cover pads, quilt and pillow fiber fill, curtain and drapery, carpet and carpet underlay, wiping cloths, towels, bags, wallcover fabrics, cushion pads, sound proofing, laminate in automobiles, ballpoint pens, telephones, sheets, blankets and upholstery.

Apparel : interlinings, coats and aprons, helmets, gloves, awnings, tents, shades, industrial & military uniforms, sportswear, sleepwear, stockings, socks, caps and construction fabrics.

Industrial : brush bristles, artificial leather, book covers, sail cloth ropes, shoe linings and filter (non food contact).

Plastic Films and Molded Plastics :

Types : polyester, polyamide, polypropylene, polyethylene, polysiloxane, polyethylene copolymer, polyvinyl alcohol, epoxy resin, phenol resin, polycarbonate, cellulose acetate, polystyrene, polyurethane, acrylic resin, methyl methacrylate, acrylonitrile butadiene styrene copolymer, polyvinyl chloride.

Applications : gloves, shower curtains, cable wraps, protective covers, non - food contact foam containers, brush handles, sponges, insulators, gaskets, non - food tubing, non - food contact containers and film, furniture, toys, bathroom utensils, kitchen & bath hardware, garden furniture & utensils, slippers, roof liners and pool liners.

Paper Coatings (not for food packaging or for food contact) :

Types : cellulosic, synthetic, specialty, reinforced

Applications : wallpaper, non - food wrap, wiping towels, book covers, corrugated paper filters, storage boxes, bags, folders, filing covers.

Paint : water based, oil based paints : for interior surface (not for exterior paint) textile dyeing and finishing operations, paint preservers, viscosity agents, plasticizers.

Adhesives (not for adhesives for paper or containers that will come in contact with food) :

Applications : adhesive for plywood manufacture, adhesive for cement tile and sealants, wallpaper glues, fiber binders, laminate adhesives, footwear adhesives.

NOTICE : Seller warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label when used in accordance with the directions under normal conditions of use, but neither this warranty of MERCHANTABILITY nor FITNESS FOR A PARTICULAR PURPOSE expressed or implied, extends to the use of this product contrary to labeling instructions or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. Any damages arising from breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values of any other special or indirect damages.