UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 0 7 2001

Alan Katz, Agent for Cytec Industries, Inc. c/o ToXel Toxicology & Regulatory Affairs 7545 Presidential Lane Manassas, VA 20109

CYTOX 2013-P Industrial Microbiocide RE:

EPA Reg. No. 68387-4

Your Amendment Dated 9/18/2001

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to

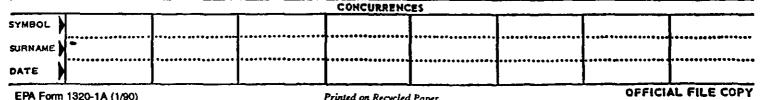
- A. Provide a revised basic and alternate Confidential Statements of Formula (CSF), and to
- B. Provide revised labels which change the declared active ingredient percentage from 33% to 35%, reflect the new registrants name and address, and update the "First Aid" and "Use Directions",

is acceptable provided you make the following three labeling changes. As per our meeting on 8/28/2001, you indicated that the intended purpose of the product is to protect the finished paper and paperboard products from microorganism attack, and not as a pulp and paper process water additive used for controlling microorganisms in the process water itself.

- 1. Therefore, to clarify this intended purpose, you must add the following sentence (or similar) to the "Use Directions",
- "Product is not intended for controlling microorganisms in the pulp and paper process water itself."
- 2. Change the sentence,
- "This product is effective in controlling microorganisms such as bacteria, fungi, and yeasts which cause deterioration of paper and paperboard products or articles molded from paper pulp",

to the following,

"This process additive product is effective in controlling microorganisms such as bacteria, fungi, and yeasts which cause deterioration of finished paper and paperboard products or articles



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molded from paper pulp"

3. Prior to the statement, "Para Uso Industrial Exclusivamente (Art. 1223 LGS)", you must provide the correct English translation. Also, delete "(Art. 1223 LGS)". The Agency does not accept the need to have this designation.

Two final notes:

The zip code on the CSF's do not match the zip code on the label for Cytec. This needs to be eventually corrected.

If the three Cytec "-P" products, and similarly the "non-P" products, contain an identical formula among each product triad, and only vary by the listed uses, they could be combined into one -P registration and one non-P registration using one "Master Label" for each set. Contact us if there is any interest in this consolidation.

A stamped copy of the accepted label is enclosed for your records.

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,

Marshall Swindell,

Product Manager Team 33,

Regulatory Management Branch I Antimicrobials Division (7510C)

SYMBOL SURNAME DATE

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CYTEC

ACCEPTED
with COMMENTS
in EVA Letter Date.b

DEC 0 7 2001

Under the Federal insecticide, Functicide, and Rodenfielde Act as amended, for the pesticide, registered under EPA Reg. No.

68387-4

Before handling this material, read CYTEC Material Safety Data Sheet # 2479 for more detailed safety, health and environmental data.

Antes de manejar este material, lea la literatura de Cytec de México, S.A. de C.V. para una información mas detallada acerca de seguridad, salud y protección ambiental. MSDS # 2479

The following components of this product are listed in accordance with right-to-know laws:

CAS Number Component Name 000067-63-0 isopropanol 000461-58-5 Dicyandiamide 000929-73-7 Dodecvlamine hydrochloride 013590-97-1 Dodecvlauanidine hydrochloride 000057-55-6 Propviene alvool 007732-18-5 Water

EPA REG No. 68387-4 EPA EST No. 1730-WV-1

Read all parts of this label

LEA CUIDADOSAMENTE ESTA ETIQUETA

CYTOX® 2013-P

Industrial Microbiocide

(Dodecylguanidine hydrochloride in isopropanol, propylene glycol and water) (CLORHIDRATO DE DODECILGUANIDINA EN ISOPROPANOL, PROPILEN GLICOL Y AGUA)

Microbicida Industrial

For use as a preservative for paper and paperboard products
(FOR CONTROL OF BACTERIA, FUNGI AND YEASTS)
(PARA CONTROL DE BACTERIAS, HONGOS Y LEVADURAS)

DANGER: KEEP OUT OF REACH OF CHILDREN
FLAMMABLE LIQUID AND VAPOR
CORROSIVE; CAUSES EYE AND SKIN DAMAGE
HARMFUL IF SWALLOWED OR INHALED
See side panel for additional precautions.

PELIGRO: Si Usted no entiende la etiqueta, busque a alguien para que se lo explique a Usted en detalle.

MANTENGALO FUERA DEL ALCANCE DE LOS NIÑOS.

LIQUIDO Y VAPORES INFLAMABLES.

CORROSIVO; CAUSA DAÑO EN OJOS Y PIEL.

DAÑINO SI SE INGIERE O INHALA.

ATTENTION

CONTAINER HEADSPACE
MAY CONTAIN
HAZARDOUS GAS OR
VAPOR, OPEN
CONTAINER WITH CARE,
USING ADEQUATE
VENTILATION AND
AVOIDING IGNITION
SOURCES.

DO NOT USE AIR
PRESSURE OR APPLY
HEAT WITH OPEN FLAME
TO REMOVE CONTENTS
OF CONTAINER.
AFTER EMPTIED,
CONTAINER MAY RETAIN
SOLID, LIQUID AND/OR
VAPOR RESIDUES.

CONTINUE TO OBSERVE
ALL PRECAUTIONS, IF
ANY, ON LABEL.
DO NOT CUT, PUNCTURE
TORCH OR WELD ON OR
NEAR EMPTIED
CONTAINER.
DO NOT USE FOR OTHER

PURPOSES.

ATENCION

EL ESPACIO LIBRE
DÉLTAMBOR PUEDE
CONTENER GAS O VAPOR
RIESGOSO. ABRA
ELTAMBOR CON
CUIDADO, USANDO
VENTILACION ADECUADA
Y EVITANDO FUENTES DE
IGNICION.
NOUSE AIRE A PRESIÓN NI
APLIQUE CALOR CON
LLAMA ABIERTA, PARA
REMOVER ELCONTENIDO

DEL TAMBOR.

OBSERVE LAS MISMAS

PRECAUCIONES CUANDO
EL TAMBOR ESTE VACIO
YA QUE PUEDE
CONTENER RESIDUOS
SOLIDOS, LIQUIDOS Y/O
VAPORES.
NO PERFORE, CORTE O

NO PERFORE CORTE O
SUELDE EN O CERCA DEL
TAMBOR VACIO.
NO UTILICE EL TAMBOR
VACIO PARA OTROS
USOS.

LOT / LOTE No.

NET CONTENTS: ___ Gallons (2.64 pounds active ingredient per gallon)

NET WEIGHT / PESO NETO : ___ Kg ___ Lbs

CYTEC Industries Inc. West Paterson, NJ 07424 USA

Emergency Phone: 1-800 / 424 - 9300 or 703 / 527 - 3887

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

"DANGER. Causes irreversible eye damage and skin burns. May be fatal if inhaled. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist. Wear protective eyewear (goggles, face shield, or safety glasses), protective clothing and rubber gloves. Wash thoroughly after handling with soap and water, and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse"

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 the first 5 minutes, then continue rinsing eye. 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 by 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 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person. HOT LINE NUMBER

NOTE TO PHYSICIAN

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

also contact 1-800-424-9300 for emergency medical treatment.

"Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock respiratory depression and convulsion may be needed."

STORAGE AND DISPOSAL

STORAGE: Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Store this product between 60°F and 110°F. Keep drum tightly closed when not in use.

DISPOSAL: Do not contaminate water, food, or feed by storage or 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. Triple rinse (or equivalent.) Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by incineration, if allowed by state and local authorities. If burned, stay out of smoke.

IN CASE OF ACCIDENT: For large spills, a NIOSH approved, positive pressure, self-contained respirator and rainsuit is recommended. Cover spills with some inert absorbent material. Sweep up absorbed spill and place in a waste disposal container for proper disposal. Flush spill area with water.

FIRE: On small fire use dry chemical or carbon dioxide. On a large fire use water spray or alcohol foam. Wear self contained positive pressure breathing apparatus and full firefighting protective clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional office of the EPA.

PARA USO INDUSTRIAL EXCLUSIVAMENTE (Art. 1223 LGS)

ACCEPTED with COMMENTS in EPA Letter Dated:

DEC 0 7 2001

Under the Federal Insecticide, Functicide, and Rodenticide Act as emended, for the pesticide, registered under F⁻⁻ Reg. No.

6838.-4

9/14

DIRECTIONS FOR USE

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

This product is effective in controlling microorganisms such as bacteria, fungi and yeasts which cause deterioration of paper and paperboard products or articles molded from paper pulp. It may be added to the pulp stock in the beater or applied to the formed sheet by size press or rollcoater, or as a uniform spray. If the product is used as a beater additive, the degree of retention of the active ingredient will depend upon the nature of the other additives in the system. Technical service is available from the manufacturer of this product to assist customers in making the proper and most efficient use of the product.

FOOD PACKAGING. For paper and paperboard intended for use in direct contact with food, the rate of application of this product must be adjusted so that the amount of the active ingredient retained does not exceed 0.4 percent by weight of the paper or paperboard. Paper or paperboard so treated may be used only in contact with nonalcoholic food having a pH above 5. A concentration of up to 0.4 percent by weight may be required for effective microbial control.

This product may also be used in the outermost ply of multiwall paper bags intended for use as containers for dry food (i.e., dry solids with the surface containing no free fat or oil), provided the amount of active ingredient retained does not exceed 0.8 percent by weight of that ply.

PAPER AND PAPERBOARD PRODUCTS FOR INDUSTRIAL OR AGRICULTURAL USE. When the paper or paperboard product is to be subjected to excessive leaching as by rainfall or contact with ground water, a concentration of up to 0.8 percent of active ingredient (dodecylguanidine hydrochloride) by weight of the paper or paperboard may be required for effective microbial control.

ACCEPTED

with COMMENTS in EPA Letter Dated:

DEC 0 7 2001

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide, registe. .nder EPA Req. No.

68387-4





