



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 12 2006

Thomas Barber
Ciba Specialty Chemicals Corp.
Home & Personal Care Segment
4090 Premier Drive
High Point, NC 27265

RE: Technical Bulletin Amendment Dated: March 2, 2006
Product Name: Irgaguard B1000
EPA Registration Number: 70404-5

Dear Mr. Barber:

The Agency has reviewed your submission submitted in accordance with continuing registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the action to be acceptable with the following conditions:

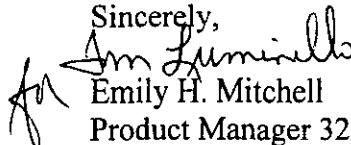
Change the phrase "Running appeal" to "Running Apparel" on page 2 of the Technical Bulletin.

Under the Warranty statement, change the word "should" to "must" so that the provision to follow directions on the label is mandatory rather than optional.

In summary your request to add "cellulosic natural fibers" is acceptable as we discussed on April 5, 2006. In the past, the Agency has requested that these Natural fibers be identified, i.e. wool, cotton, fur, hair, etc. The Agency no longer objects to this restriction at this time. Your request to reduce the lower range for active ingredient amount for incontinence products is acceptable.

If you have questions concerning this letter, please contact Tom Luminello by telephone, (703) 308-8075, or by e-mail at luminello.tom@epa.gov.

Sincerely,


Emily H. Mitchell

Product Manager 32

Antimicrobials Division



Ciba

Irgaguard® B1000

Bacteriostat

ACTIVE INGREDIENT:

5-chloro-2-(2,4-dichlorophenoxy)

-phenol.....99.0%

INERT INGREDIENTS..... 1.0%

Total: 100.0%

EPA Reg. No. 70404-5 EPA Est. 70404-DEU-001
EPA Est. # 70404-NC-001, EPA Est.#70404-AL-002

Keep Out of Reach of Children

CAUTION

See additional precautionary statements and directions for use on the side panel.

Irgaguard® B1000 Trademarks of
Ciba Specialty Chemicals Corporation
© 2002 Ciba Specialty Chemicals Corporation

Net Weight LBS Kg

IMPORTANT: Read the entire directions for use before using this product

DIRECTIONS FOR USE

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

USE DIRECTIONS: Irgaguard B1000 is an end-use (EP) bacteriostatic agent for the manufacture of polymer/plastic and textile products only. Not for Diaper Laundry Application.

Please refer to the Technical Bulletin for information concerning uses.

STORAGE AND DISPOSAL

Store below 130°F. Do not contaminate water, food or feed by storage or disposal. Wastes resulting from use of this product may be disposed of on site or at an approved waste facility. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration by state and local authorities. If burned stay out of smoke. Drum cannot be reused, dispose of in same manner

For minor spills, shovel into an approved disposal container, vacuum contaminated areas. Avoid creating dusty conditions. Take special precaution to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes. In the event of a major spill, fire or other emergency, call 1-800-873-1138 day or night.

Ciba Specialty Chemicals Corporation
540 White Plains Rd., Tarrytown, NY 10591
24-Hr Emergency Phone: 800-873-1138

ACCEPTED
with COMMENTS
Letter Dated:

APR 12 2006

Use of this product as Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

70404-5

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if inhaled. Do not breath dust, vapor or spay mist. Wear a mask or a pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Remove contaminated clothing. Wash thoroughly with soap and water after handling

ENVIRONMENTAL HAZARDS:

This product is toxic to fish and aquatic vertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public 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.

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 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 further treatment advice.

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 poison control center or doctor. Do not give anything by mouth to an unconscious person.

If inhaled: Move person to fresh air. If not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact 1-800-873-1138 for emergency medical treatment.

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Ciba

Ciba Specialty Chemicals Corporation
Plastic Additives

IRGAGUARD® B 1000

EPA Reg. 70404-5

Broad-spectrum bacteriostat for use in the manufacture of polymer / plastic and textile products.

IRGAGUARD B 1000 is an end-use (EP) bacteriostatic agent for the manufacture of polymer / plastic and textile products. IRGAGUARD B 1000 is effective against non-health related organisms which contribute to the deterioration, discoloration and production of unpleasant odors in polymeric materials.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use only under an agreement with Ciba Specialty Chemicals Corporation. Irgaguard B 1000 is intended for use as an additive into the following materials and substances as part of the manufacturing process in order to provide built-in antibacterial and antifungal activity in manufactured materials and finished products. Irgaguard B 1000 inhibits the growth of non-health related microorganisms such as bacteria, mold, mildew, and fungus that may cause odor, stain, discoloration, unsightly texture, decay, or deterioration of physical properties of the material and finished product. Distributors of products containing the additive may not make claims of antimicrobial activity other than the protection of the product against the growth of bacteria, mold, mildew and fungi in or on the treated product. For further guidance on treated article label claims, please refer to 40 C.F.R. §152.25(a) and any additional guidance or policies issued by the U.S. Environmental Protection Agency.

TYPES OF MATERIALS:

cellulosic

Plastics (including films, foams, molded parts, pellets, sheets), fibers/fabrics (including multi-fiber blends, natural fibers and synthetic blends with natural fibers) composed of: Acetate, Acrylic, Acrylonitrile butadiene styrene, Epoxy, Fluoropolymers, Latex, Nitrile copolymers, Nylon, Polychlorophene, Polyester, Polyethylene, Polypropylene, Polystyrene, Polyvinylchloride, Rayon, Rubber (natural & synthetic derivatives), Silicone, Urethane, & Vinyl and coating/finishes applied to such materials.

REGISTERED UNDER FEDERAL LAW
EPA REG. NO. 70404-5

APR 12 2006

Under the Federal Insecticide, and Fungicide, and Plant Disease Act, as amended, this product is registered under EPA Reg. No. 70404-5

Features

Bacteriostat for textile treatment:

IRGAGUARD B 1000 can be used to control odor-causing and spoilage/deterioration microorganisms on or in textiles and textile fibers.

Bacteriostat for polymer/plastic treatment:

IRGAGUARD B 1000 can be added to polymers / plastics to protect the material against direct or indirect effects by microorganisms which can cause deterioration of the physical properties, appearance or odor of the material.

APPLICATIONS

1. Textiles and Fabrics:

Manufactured materials may be used in the following applications such that the finished product contains 0.10% to 2.0% by weight of the active ingredient, except where noted. The additive may be incorporated directly into the fiber or as a finish for the fabric/product.

Apparel trimmings and linings
 Aprons (food service, home)
 Athletic Wear
 Awnings (Indoor and outdoor)
 Bibs
 Blanket bags
 Blankets
 Brushes
 Carpets and Rugs
 Conveyor belts
 Covers for counter tops
 Covers for table tops
 Cubicle curtains
 Door and floor mats
 Dresses
 Exercise equipment
 Floor coverings
 Food Services wipes (towels)
 Furniture fabrics
 Garment bags
 Gloves (non-medical)
 Gowns (medical & consumer)
 Hair brushes
 Hosiery and socks
 *Incontinence care products (diapers and underpads)

ACCEPTED
 WITH COMMENTS
 EPA Letter Dated:
 APR 12 2006
 Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, and as a pesticide,
 under the authority of the Act, No.
 70404-5

Intimate Apparel (Underwear)
 Janitorial brushes and brooms
 Linens (towels, sheets, pillowcases, mattress covers, etc.)
 Mattress and pillow ticking
 Medical and Dental clothing
 Mops
 Paper mulch
 Pillow and mattress stuffing
 Quilt fabric
 Running apparel
 Service Uniforms
 Shoes, shoe inner soles and linings
 Shower curtains
 Silage wraps
 Sporting team uniforms
 Sportswear
 Sweatshirts/t-shirts
 Table clothes, napkins
 Tooth brush bristles
 Uniforms
 Wall covering
 Wet suits
 Window curtain and draperies

*Use rates of 0.015% to 2.0% for odor control may be used

2. Polymers and plastics

Manufactured materials may be used in the following applications such that the finished product contains 0.10% to 1.0% by weight of the active ingredient. The additive may be incorporated directly into the polymer or as a coating on the final product.

Adhesives
 Agricultural & mulch films
 Combs & brushes

Containers for cosmetics
 Conveyor belts
 Counter and Table tops

Currency
 Cushions
 Cutting boards
 Door & Floor mats
 Exercise & gym equipment
 Floor coverings (wax, sealers, and coatings)
 Flooring (concrete, epoxy, component fibers, & coatings of urethane, epoxy etc.)
 Floral containers
 Food distribution carts
 Food service trays
 Furniture coverings
 Furniture foam cushions
 Garbage bags and trash can liners
 Garbage cans
 Grease traps
 Medical & dental trays
 Menu materials
 Metallic coatings for plumbing fixtures, door handles, serving utensils, bed pans, and floor drains

Mop buckets
 Mops & mop components
 Pallets
 Paper and paperboard products
 Personnel cards (credit cards, driver's license, etc.)
 Playground equipment & furniture
 Portable toilets
 Sponges (Cellulose)
 Shoe inner soles
 Storage containers (for clothing, instruments, electronics, food & condiments)
 Tile (wall & floor) & grout
 Toilet seats
 Toilets and urinals
 Tooth brush handles
 Toys
 Tray liners
 Waste bins
 Wheel for medical carts
 X-ray holders

Chemical and Physical Properties

Chemical name: 2,4,4'- trichloro-2'-hydroxy-diphenyl-ether
 Generic name: triclosan
 CAS number: 3380-34-5
 Molecular weight: 289.5
 Melting point: 57±1°C
 Odor: Slightly, faintly aromatic
 Appearance: Whitish fine crystalline powder
 Purity: 99% minimum
 Ash content: 0.1% maximum
 Bulk Density: 0.55 - 0.61 kg/l
 Specific Gravity: 1.58±0.03 g/cm³

Solubility:
 IRGAGUARD B 1000 is sparingly soluble in water, moderately soluble in dilute alkaline solutions, and readily soluble in most organic solvents. Clear concentrated solutions can be prepared with water-miscible solvents or surfactants.

Thermal Stability:
 IRGAGUARD B 1000 does not decompose under normal storage conditions. It shows good stability when heated at 200°C for up to 2 hours. Differential scanning calorimetry studies have shown no rapid decomposition of the powder at temperatures below 300°C.

Light stability:
 In powder form, IRGAGUARD B 1000 is highly stable to intense radiation, but solutions may show instabilities when exposed to intense UV-light radiation.

Volatility:
 The vapor pressure of IRGAGUARD B 1000 is 4 x 10⁻⁶ mm Hg at 20°C and 2 x 10⁻² mm Hg at 100°C.

Conditions of Sale and Warranty

ACCEPTED
 WITH COMMENTS
 EPA Letter Dated:
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 Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, and as pesticide,
 under the Federal Insecticide,
 Fungicide and Rodenticide Act, Reg. No.
 70404-5

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Ineffectiveness, or other unintended consequences may result because of such factors as presence of other materials, or the manner of use or application all of which are beyond the control of Ciba Specialty Chemicals Corporation ("Ciba") or the Seller. All such risks shall be assumed by the Buyer.

Ciba warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. **Ciba makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall Ciba or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product.** Ciba and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of Ciba.

No end-use of this product other than as described above is intended or implied by the above conditions of sale and warranty.

ACCEPTED
BY BUYER
DATE: _____

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Rodenticide and
Fungicide,
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