

PM 32

71769-1

10/28/99

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U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Antimicrobials Division (7510C)  
401 "M" St., S.W.  
Washington, D.C. 20460

EPA Reg. Number:  
71769-1

Date of Issuance:  
OCT 28 1999

NOTICE OF PESTICIDE:

- Registration
- Reregistration

Term of Issuance: Conditional

Name of Pesticide Product: PrimaGard

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Robert R. Stewart, Agent for PrimaGard Corporation  
c/o Technology Sciences Group Inc.  
1101 17th Street N.W., Suite 500  
Washington, D.C. 20036

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Antimicrobials Division prior to the use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Submit two copies of the revised final printed label for the record changing the EPA File symbol 71769-R to EPA Registration Number 71769-1 and add establishment number.
3. Make every effort to assure that all customers who use this product understand that this is not a disinfectant product and that they are aware of the labeling restrictions contained on the label and technical bulletin(s).
4. You must delete the redundant phrase "Keep Out of Reach of Children" under the Precautionary Statements and move the Environmental Hazard statement from page 2 to page 1 and place under the heading HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

(1 of 3)

Signature of Approving Official:

Robert S. Brennis  
Product Manager 32

Date:

OCT 28 1999

5. Your technical bulletins must include the following language and added to the *Directions for Use* area before specific instructions regarding incorporation into paper, plastic, and latex products.

PrimaGard Additive is effective against non-health related organisms which may contribute to the deterioration of the treated product. The use of PrimaGard Additive extends the life of the treated article and controls deterioration resulting from non-health related organisms on treated articles. Finished products containing PrimaGard Additive may not make claims of antimicrobial activity other than the protection of the article itself against growth of bacteria and mold in or on the treated article.

- \* **Do not use in the manufacture or treatment of items that may come in contact with food, unless specifically noted.** (Must be in bold type).
- \* Use only under an agreement with PrimaGard Corporation.
- \* Do not use for the production of baby diapers or fiber for the production of baby diapers.
- \* Do not use for the production of health care products or products intended to decrease the transmission of disease (items regulated by the Food & Drug Administration).

The following conditions apply to labels for exempted treated articles:

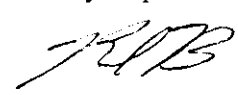
- A. No implied or explicit public health claims of any kind may be made.
- B. The claims concerning the presence of a pesticide in the treated article are limited to protection of the treated article only.
- C. When such claims involve antibacterial properties, the words "antibacterial," "antimicrobial," "germicidal," or related terms, which are not part of the name of the product, the permissible claims must be qualified by statements indicating that the presence of antibacterial properties does not protect the users against disease. The users of this product should follow prudent hygienic measures by cleaning and washing themselves and the article if possible.

If you have any language on the treated article label which indicates that the article has been treated with a regulated substance, then you must include language similar to the following statement:

Antibacterial properties are built-in to inhibit the growth of bacteria that may affect this product. The antibacterial properties do not protect users or others against bacteria, viruses, germs or other disease organisms. Always clean and wash this product thoroughly before and after use.

If applicable, the following statement should also be used:

Antibacterial properties will not wash off and are intended only to protect the product.



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All references to "antibacterial" properties and the required qualifying statements must be located together, must be printed in type of the same size, style and color and must be given equal prominence. Moreover, such references may not be given any greater prominence than other described product features.

No claims may be made to provide a safer or healthier environment to mitigate disease or to control the spread of allergens or insect vectors. Such claims are not exempted treated article use sites and may only be obtained through the development of acceptable performance data and separate end-use registration allowing such claims.

6. Submit two copies of the revised final printed label and all relevant technical bulletins for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.



# PrimaGard

## ADDITIVE

A preservative, bacteriostatic agent for use in the manufacture of polymer plastic, paper, and latex products.

**Active ingredient:**

5-Chloro-2-(2,4-dichlorophenoxy) phenol ..... 99%

**Inert Ingredients** ..... 1%

**Total** ..... 100%

### Keep Out of Reach of Children

### CAUTION

PRECAUTIONARY STATEMENTS

~~Keep Out of Reach of Children~~      *delete*

**Hazardous to Humans and Domestic Animals**

**Caution.** Harmful if swallowed or inhaled. Do not breathe dust. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**Statement of Practical Treatment:**

If inhaled:      Remove victim to fresh air.

If swallowed:    Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If in eyes:      Flush with plenty of water. Call a physician if irritation persists.

If on skin:      Wash with plenty of soap and water. Get medical attention if irritation persists.

*Move up*

*INSERT Environment HAZARD Statement*

ACCEPTED with COMMENTS by EPA Center Director

OCT 28 1999

*Small text: EPA Center Director, Office of Pesticide Programs, Washington, DC 20460*

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PrimaGard Additive  
Draft July 20, 1999

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### Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This additive is to be used only for compounding or formulating proprietary products under written agreement and in accord with specific instructions issued by PrimaGard Corporation. Specific directions for reformulation will be provided by PrimaGard.

### Storage and Disposal

- PESTICIDE STORAGE      Store below 130°F. Do not contaminate water, food or feed by storage or disposal.
- PESTICIDE DISPOSAL      Wastes from the use of this product may be disposed of on site or at any approved waste disposal facility.
- CONTAINER DISPOSAL      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 if allowed by State and local authorities. Drum cannot be reused, dispose of in the same manner.

For minor spills, shovel into approved disposal container; vacuum contaminated areas. Avoid creating dusty conditions, Take special care to avoid contamination of equipment and facilities during clean up procedures and disposal of wastes.

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans of other water unless in accordance with the requirements of a National Pollution 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.

EPA Reg. No. 71769-	EPA Est. No.	Net Contents
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PrimaGard Corporation  
 364 Argyle Road  
 Brooklyn, NY 11218  
 Telephone: 718-826-2500  
 Fax: 718-940-9897

ACCEPTED  
 with COMMENTS  
 in EPA Letter Dated:  
 OCT 28 1999

to the Federal Insecticide,  
 Fungicide, and Rodenticide Act as  
 amended, for the pesticide,  
 registered under EPA Reg. No.  
 71769-1

Heading:  
 ENVIRONMENTAL HAZARD  
 (must be moved to front)

PrimaGard Additive  
 Draft July 20, 1999