

72304-7

03/11/2004



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 11, 2004

John R. French, Ph.D.
Technical Director
Sostram Corporation
300 Colonial Center Parkway, #230
Roswell, GA 30076

Subject: Protram 20
EPA Registration No. 72304-7
Application Date: January 9, 2004
EPA Received Date: January 12, 2004

Dear Dr. French:

The following amendment, submitted under connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

Proposed Amendment

- Revised labeling in response to PR Notice 2001-1

Conditions

Revise the label as follows:

- The Storage and Disposal format must be displayed as follows:

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original.....in a safe place.

Pesticide Disposal: Pesticide wastes are.....Office for guidance.

Container Disposal: Triple rinse container.....If burned, stay out of smoke.

CONCURRENCES

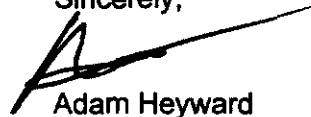
SYMBOL	75/02						
SURNAME	Schuy						
DATE	3/11/04						

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three(3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)



SOSTRAM CORPORATION
PROTRAM® 20
INDUSTRIAL FUNGICIDE

Active Ingredient:	
3-Iodo-2-propynyl butyl carbamate	20%
Other Ingredients	80%
Total	100%
Contains 1.73 lbs. active ingredient per gallon	

KEEP OUT OF REACH OF CHILDREN
WARNING - AVISO

FIRST AID	
IF INHALED	<ul style="list-style-type: none"> ➤ 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	<ul style="list-style-type: none"> ➤ 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 IN EYES	<ul style="list-style-type: none"> ➤ 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 SWALLOWED:	<ul style="list-style-type: none"> ➤ Call a poison control center or doctor immediately for treatment advice. ➤ Have affected person sip a glass of water if able to swallow. ➤ Do not induce vomiting unless told by a poison control center or doctor. ➤ Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Emergency phone numbers	(800) 424-9300 CHEMTREC (transportation and spills)
NOTES TO PHYSICIAN: Exposure to high concentrations via inhalation may result in the inhibition of acetylcholinesterase and produce related symptoms. Probable mucosal damage may contraindicate the use of gastric lavage.	

EPA Reg. No. 72304-7

Net Contents _____ Gallons

EPA Est. No. _____

ACCEPTED
with **COMMENTS**
EPA Letter Dated:

MAR 11 2004

MANUFACTURED FOR
SOSTRAM CORPORATION
300 Colonial Center Parkway, Suite 230
Roswell, Georgia 30076

Under the Federal Insecticide, Fungicide, and Rodenticide Act and amendments thereunder, this product is registered under EPA Reg. No. 72304-7

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

WARNING - AVISO

Causes skin irritation. Harmful if swallowed, absorbed through the skin or inhaled. Causes moderate eye irritation. Do not get on skin, in eyes or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing before reuse.

ENVIRONMENTAL HAZARD

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, ponds, streams, 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.

STORAGE & DISPOSAL

PESTICIDE DISPOSAL

Keep container tightly closed when not in use. Do not reuse container. Do not store with strong oxidizing agents or strong (concentrated) acids. 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. For wastes, which cannot be disposed of by use according to label instructions, contact your local State Pesticide or environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

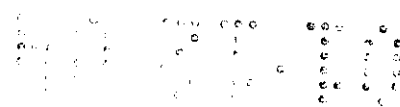
CONTAINER DISPOSAL

Triple rinse container. 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.

ACCEPTED
with COMMENTS
in EPA Letter dated

MAR 11 2004

Under Contract No. 72304-7
Funding Agency: EPA
Contract No. 72304-7
Fiscal Year: 2004



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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 formulation is not cleared by Federal Food, Drug and Cosmetic Act for use in manufactured food grade adhesive, paper and paper board products and paper coating.

Adhesives

Protram 20 can be used as an additive to non-medical, non-food use natural and synthetic adhesive formulations and caulks to prevent the growth of fungal organisms in the material both in the wet state and in the dry film of the finished product. Recommended use levels are between 0.1 – 1.25% wet formulation weight. This product should be added toward the end of production cycle with good agitation to ensure a uniform distribution. For example, to inhibit the growth of mildew on a latex-based wall cover adhesive for a non-food area add 1.0% (10 lbs. of Protram 20 per 1000 lbs. of latex-based adhesive formulation) of this product to the latex-based formulation.

Aqueous Metalworking, Cutting, Cooling, & Lubricating Concentrates

To inhibit the growth of fungi in an aqueous metalworking, cutting, cooling & lubricating concentrates add an amount that will give up to 5,000 ppm in the diluted fluid. The amount required in the concentrate will depend on the end use dilution. For example, if the desired level of this product in the diluted fluid is 500 ppm, and the end use dilution of the fluid is 5%, then a 1.0% concentration of this product is required in the concentrate ($500 \text{ ppm} / 0.05 = 10,000 \text{ ppm}$ or 1.0%).

Aqueous Metalworking, Cutting, Cooling, & Lubricating Fluids

To inhibit the growth of fungi in an aqueous metalworking, cutting, cooling & lubricating fluids add up to 5,000 parts per million (0.5% v/v) of this product to the diluted fluid (0.5 gallons per 100 gallons of solution or 5 liters per 1000 liters). This product may be added to the fluid at the time it is prepared (diluted) or to the reservoir (sump) containing the fluid after it is put into use. If it is added to the reservoir, the fluid should be circulated after addition to ensure mixing.

Cordage

Protram 20 may be used as a mildewcide in both aqueous and solvent based process formulations, which coat cordage. Typical use levels of this product will range from 0.1 – 5% of the process formulations used in the process of these cordages. This product should be added to the process formulation at the end of the production cycle with good agitation to prevent possible mechanical losses and to ensure a uniform distribution. As an example, to inhibit the growth of mildew on cordage intended for a non-food area add 2.5% (25 lbs. Protram 20 per 1000 lbs. of process formulation) of this product to the process formulation.

Inks

Protram 20 may be used in aqueous-based ink solutions for protection of these solutions against attack by fungal organisms. It is recommended that this product be added at the end of the production cycle with good agitation. This product will generally impart protection when used at levels of 0.05 – 3.0% of active ingredient based on the formula weight.

Paints and Stains

Protram 20, used in solvent and waterborne paints and stains, will inhibit the growth of mildew. Addition should be at the end of the manufacturing process and allowed to mix long enough to be adequately dispersed and should not be added to hot paint. Typical levels for protection

ACCEPTED
WITH COMMENTS
EPA List 1
MAR 11 2001

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended for the FIFRA Act, registered under EPA Reg. No. 72304-7

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against mildew on painted surfaces are 0.5 – 2.4% by weight on wet paint. For example, house paint with a wet density of 10 lbs. per gallon would use 5 – 24.0 lbs. of this product per 100 gallons of wet paint. Where the climate is severe and mildew growth is a major problem for painted surfaces, more would be required, as much as 4.0% by weight in the paint. For interior paint use, approximately half the exterior concentrations should be used, 0.2 – 1.2% by weight in the paint. Appropriate levels are best determined by field trials.

Plastics and Plastic Coatings

Protram 20 may be used to prevent surface mildew growth on plastic items such as shower curtains, cable and wire insulation and sun umbrellas. Intended plastics include polymers such as PVC. Use levels of 1.5 – 5.0% by weight of the plastic are generally adequate. This product should be dispersed in the plasticizer or color concentrate before it is incorporated into the resin to ensure a uniform distribution. Use of this product is not recommended if the heat of processing is above 350 °F for prolonged periods, nor should it be used in a plastic that will be in contact with food or medical device applications.

Paper Coatings

Protram 20 may be used as a mildewcide in both aqueous and solvent-based coatings, which are applied to paper and cardboard substrates. This product can be used to prevent mold and mildew from growing on products such as: corrugated cardboard or soap wrappers, wall covers, non-food contact packaging materials, and non-food contact paper tapes. Use levels of this product range from 0.1 – 3.75% of this product by weight. This product should be added at the end of the production cycle and with good agitation to prevent possible mechanical losses and to ensure uniform distribution. As an example, to inhibit growth of mildew on corrugated cardboard intended for a non-food packaging add 2.5% (25 lbs. Protram 20 per 1000 lbs. of coating material) of this product to the coating material formulation.

Wood Preservation

Protram 20 is a liquid designed for use as a wood preservative for use in above ground applications. All recommendations of use levels are in percentage by weight, and refer to this product. Dosage ranges are given for the various applications to indicate the approximate levels for a particular application. Exact level of use should be determined by field trials

Protram 20 may be applied from solvent solutions or aqueous dispersions to new lumber, plywood, particle board, etc., to prevent the growth of mildew, sapstain and wood rot on these substrates. This product is recommended for use on wood in above ground use only.

Treating solutions may be prepared by diluting this product in alcohols or aromatic solvents or by dispersion in water. Levels of 0.5 – 6.0% of this product are suggested depending upon the severity of conditions for end use, and the extent of time that protection is required.

For freshly sawn lumber, a concentration of 1.0% of this product is suggested as a starting level. A one minute dip at ambient temperatures in a solution or aqueous dispersion containing 1.0% of this product should be adequate to control the development of mildew and sapstain organisms on the lumber. Because of the great variation in susceptibility of fresh sawn lumber relating to the type of wood, sawing and storage techniques, conditions of humidity, method of treatment, etc., it is usually necessary to carry out field tests to determine the most appropriate means of application and the optimum concentration of this product to be used within the range specified.

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For best results, lumber should be treated within twenty-four hours after it is sawed. The lumber should be completely immersed in the treating bath, and the treating vat designed to permit easy immersion and removal, and to minimize spillage. The vat may be cleaned by emptying and rinsing with a suitable solvent or by use of a detergent solution. To add additional product while treating, first prepare the proper solution or emulsion in a separate container (of wood, plastic, or stainless steel construction) and add to the treating vessel.

After treatment, lumber should be stacked in a properly maintained seasoning yard with good drainage so that no water will accumulate, in any area. The yard should be kept free from weeds and vegetation, which may hold moisture and promote growth of decay and stain producing fungi. All debris and lumber scraps should be removed from the area. A properly laid out yard should take advantage of prevailing winds to permit good air circulation. Main alleys should be at least 16 feet wide. Stack foundations should be sufficiently elevated to permit ready access of air to the pile, and allow water to drain off quickly.

WARRANTY AND LIMITATIONS OF DAMAGES

CONDITIONS OF SALE: Sostram Corporation warrants that this product conforms to the chemical description stated on the label when used in accordance with the directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Sostram. SOSTRAM DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SOSTRAM SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL, OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, AND SOSTRAM'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. BUYER AND USER ACKNOWLEDGE AND ASSUME ALL RISKS AND LIABILITY RESULTING FROM HANDLING, STORAGE AND USE OF THIS PRODUCT. SOSTRAM DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

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