

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

June 15, 2004

Elaine O'Grady
Regulatory Manager
Triosyn Corp.
1191 South Brownell Road
Willston, VT 05495

Subject: Triosyn T50 Powder
EPA Registration No. 72897-2
Application Date: March 30, 2004
Receipt Date: March 31, 2004

Dear Ms. O'Grady:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- minor change to Directions for Use statement

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Y. Mitchell
Product Reviewer (32)
Regulatory Management Branch II
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL	7510C	7510C						
SURNAME	E. Berg	Mitchell						
DATE	6/15/04	6-15-04						

32



May 25, 2004

VIA FEDERAL EXPRESS

Ms. Emily Mitchell (PM32)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington VA 22202-4501

Subject: Notification to Make a Minor Modification to the Directions for Use for Triosyn T50 Powder (EPA Reg. No. 72897-2)

Dear Ms. Mitchell:

Triosyn Corp. (Company No. 72897) would like to make a minor modification to a sentence in the "Directions for Use" label text for Triosyn T50 Powder (EPA Reg. No. 72897-2). As discussed by telephone, the modification is meant to clarify the intent of the sentence. The current statement reads: *"Specific manufacturing directions for a given application will be provided by consultation with Triosyn Corp."* As modified, the sentence would read: *"Triosyn technical experts are available to determine optimum manufacturing conditions for specific application purposes."*

Pursuant to your recommendation, I am submitting this notification and revised draft labeling for Triosyn T50 Powder. As prescribed by PR Notice 98-10, this modification does not result in greater exposure than the currently registered method(s); the new application method results in no change in dosage, concentration, timing or frequency of application of the product; and the product is not registered for public health related uses. In support of this notification, please find enclosed the following documents: (1) an Application Form (EPA Form No. 8570-4); (2) Five copies of the Draft Label (including 1 copy showing revisions in red font). In addition, please note that the certification statement required by PR Notice 98-10 is included on the enclosed Application Form.

If you have any questions regarding this submission, please feel free to contact me at (802) 865-5084.

Sincerely,

Elaine O'Grady
Regulatory Manager

Enclosures





Use read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72897/72897-2	2. EPA Product Manager Emily Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Triosyn T50 Powder	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Triosyn Corp. 1191 South Brownell Road Williston, VT 05495 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to modify a sentence in the Directions for Use of Triosyn T50 Powder. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to an enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Notification must be submitted		If "Yes" Unit Packaging wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Elaine O'Grady	Title Regulatory Manager	Telephone No. (Include Area Code) (802) 865-5084
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Elaine O'Grady	5. Date May 25, 2004	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin or clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash hands thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing separately before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, estuaries, oceans, or other 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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep container closed when not in use. For extended periods, store in cool, dry location. Keep tightly closed during storage. Do not expose to direct sunlight. Open dumping is prohibited.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse. 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.



TRIOSYN® T50 POWDER

Microbiostatic Agent*

SOLD FOR INDUSTRIAL USE ONLY

Active Ingredient:

Iodine*	45.2 %
Other Ingredients	54.8 %
Total	100.0 %

*From Quat amine divinylbenzene/styrene copolymer iodine complex

KEEP OUT OF REACH OF CHILDREN

DANGER

(See side panel for additional precautionary statements)

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.

HOT LINE NUMBER

For medical questions, emergencies or accidents involving this product call: 1-800-222-1222. Have the product container or label with you when calling a poison control center or doctor.

EPA Reg. No. 72897-2 / EPA Est. No. 72897-VT-1

Net Contents: xx lbs / xx kgs

Lot No.-----

Manufactured by

Triosyn Corp.

1191 South Brownell Road

Williston VT 05495

* A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, which cause staining & discoloration, fungi (mold & mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use only under agreement with Triosyn Corp. Specific manufacturing directions for a given application will be provided by consultation with Triosyn Corp. Triosyn technical experts are available to determine optimum manufacturing conditions for specific application purposes. When incorporated into the manufacturing process, Triosyn® T50 powder provides built-in antimicrobial and antifungal activity in the types of manufactured materials and finished products listed below. Triosyn® T50 Powder inhibits the growth of microorganisms such as bacteria, mold, mildew, and fungus that may cause odor, stain, discoloration, unsightly texture, decay, or deterioration of physical properties of the materials and finished products. This product is intended for use as an additive during the manufacturing process for the following materials/applications:

Paints, stains, and other coating systems, including enamel urethanes, wood stains, and alkyd epoxy enamels, for use on exterior surfaces only. Triosyn® T50 Powder will normally impart protection when added at levels between 20% and 30% (wt/wt). More may be required in hot, humid areas, where mildew is particularly severe.

Synthetic and non-woven textile materials for use in aquarium filters, air filters/materials, door and floor mats, and outdoor equipment such as awnings, tarpaulins, and portable outdoor shelters. Triosyn® T50 Powder will normally impart protection when added at levels between 12.5% and 45% (wt/wt) of the laminate.

Not for use in HVAC filters or products that come into contact with food. Finished products containing Triosyn® T50 Powder may not make public health claims relating to antimicrobial activity without first obtaining the necessary regulatory approvals.