

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 23 2004

Ishizuka Glass Co. Ltd.  
c/o Delta Analytical Corporation  
7910 Woodmont Ave., Suite 1000  
Bethesda, MD 20814

Attention: Mr. Jeff Jones, Agent Ishizuka Glass Co. Ltd.

Subject: **IONPURE WPA**  
EPA Registration Number 73148-1  
Resubmission Date: September 15, 2004  
EPA Received Date: September 15, 2004

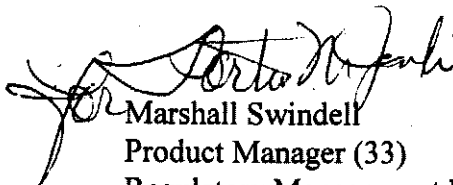
This will acknowledge receipt of your notification, submitted under the provisions of FIFRA section 3 ( c ) 9. Based on a review of the material, the following comment apply.

This application is acceptable and has been made a part of the records for this file.

- Add coating, an indoor, non-food use sites.

If you have any comments or questions concerning this letter please contact me at (703) 308-6341 or Portia Jenkins at (703) 308-6230.

Sincerely,



Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch I  
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL	SURNAME	DATE						

Please read instructions on reverse before completing form.

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

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <b>303482</b>
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**Application for Pesticide - Section I**

1. Company/Product Number 73148-1	2. EPA Product Manager SWindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IONPURE WPA	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Ishizuka Glass Co. Ltd. c/o Delta Analytical Corporation 7910 Woodmont Ave. Suite 1000 Bethesda, MD 20814 <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 add coatings, an indoor, non-food use site to approved label

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 enforcement action and penalties under section 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged in:					
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	2. Type of Container		
* Certification must be submitted			<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package 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 Jeff Jones	Title Agent, Ishizuka Glass Co. Ltd.	Telephone No. (Include Area Code) 301 652 5495
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 Agent, Ishizuka Glass Co. Ltd.	
4. Typed Name Jeff Jones	5. Date 72 March 2004	

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For: Portiz Jenkins

2  
March 12, 2004

Mr. Marshall Swindell, PM (33)  
Registration Division (7504C)  
Office of Pesticide Programs  
Ariel Rios Building  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Post-It® Fax Note	7871	Date	9/14/04	# of pages	10
To	Portiz Jenkins	From	Jeff Jones		
Co./Dept.		Co.			
Phone #	per telephone	Phone #	conversation		
Fax #		Fax #			

Re: IONPURE WPA; EPA Reg. No. 73148-1; Notification of New Non-Food, Indoor Use Site

Dear Marshall:

On behalf of Ishizuka Glass Co. Ltd., I am submitting the following documents pursuant to notification of a proposed new use site meeting the criteria of PR Notice 98-10.

- Application for Pesticide (EPA Form 8570-1)
- Proposed Label (five copies)
- Current label with proposed changes highlighted

If you have questions regarding this submission or require additional information, please contact me.

Sincerely,

*Jeff Jones*

T. Jeffrey Jones, Agent  
Ishizuka Glass Co. Ltd.

Enclosures

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(Supplemental Labeling)

# IONPURE WPA

Silver Glass

Claims: IONPURE WPA is to be incorporated into the following materials at suitable stages of the manufacturing process to preserve the integrity of the manufactured/treated materials, and thus make them suppress the growth of bacteria and mold. Not for use in food grade paper, paperboard product, paper coatings, and adhesives.

### Plastics and films

use: non food use only, no food contact and no water pipes.

polymers: polyester, polyamide, polypropylene, polyethylene, polysiloxane, polyethylene copolymer, polyvinyl alcohol, epoxy resin, phenol resin, polycarbonate, cellulose acetate, polystyrene, polyurethane, acrylic resin, methyl methacrylate, acrylonitrile butadiene styrene copolymer etc.

products: gloves, shower curtains, cable wraps, protective covers, foam containers, brush handles, sponges, insulators, gaskets, tubings, containers, films, furnitures etc.

### Paint

use: not outdoor paint

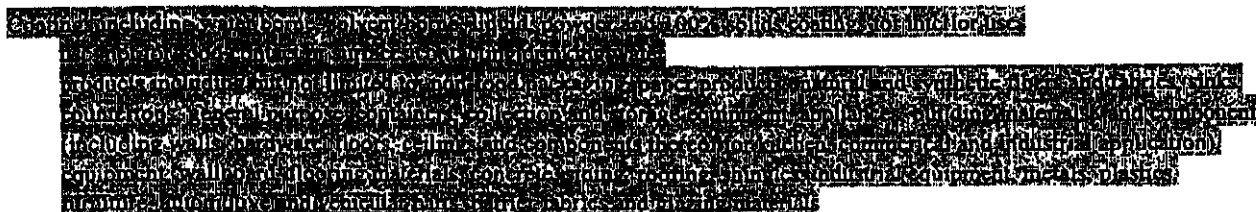
type: water based or solvent based paint

### Paper coating

use: non food packaging paper, no food contact, and not for paper production use

type: cellulosic, synthetic, speciality, reinforced papers etc.

products: wallpaper, wiping towels, book covers, corrugated paper filters etc.



### Adhesive

use: not for adhesives for paper or containers that will come in contact with food. products: adhesives for plywood manufacture, adhesive for cement tile and sealants etc.

### Fibers

polymers: polyester, polypropylene, nylon, polyethylene, acrylic, rayon etc.

products for home furnishings: mattress cover pads, sheets, blankets, quilt and pillow fiber fill, curtain and drapery, carpet and its underlay, upholstery, wiping cloth, towels, bags, wallcover fabrics, cushion pads, etc.

products for apparel: interlinings, industrial uniforms, coats and aprons, sportswear, sleepwear, stockings, socks, helmets, caps, gloves etc.

products for industrial: brush bristles, shoe linings, artificial leather, filter, book covers, sail cloth, ropes etc.

### Textile Finishing

products: various surface resin coating textiles

ISHIZUKA GLASS Co. Ltd.  
11-15, Takatsuji-cho, Showa-ku  
Nagoya, Japan  
Tel (81)-52-871-3329

# IONPURE WPA

## Silver Glass

### DIRECTIONS FOR USE:

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

### BLENDING AND FORMULATING INSTRUCTIONS FOR THE LISTED MATERIALS

IONPURE WPA is a silver glass antimicrobial powder designed to be incorporated into various materials at various stages of their manufacturing process to preserve the integrity of the manufactured materials. The powder can be incorporated into the materials as an integral part of the finished products throughout their entire thickness, or as a film over the surfaces of the manufactured materials, depending on the particular method of manufacture of the finished materials and needs of the manufacturer.

IONPURE WPA may be incorporated into the following materials at the specified Maximum Concentrations (MC) on a dry weight basis of finished products, or on a weight by weight basis for liquid products such as paints.

	APPLICATION	MC
Plastics and Films:	non food use only and no water pipes polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester	1.5 %
Paint:	Water base and solvent base-Interior only	1.5 %
Paper coating:	non food packaging paper, no food contact, not for paper production use	1.5 %

~~Paints including water base, solvent base, liquid, powder and 100% solids, and other coatings~~

	<del>ionics based on polypropylene, polyethylene, polyvinyl chloride, polyacetate, and polyester</del>	1.5 %
	<del>polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester</del>	
	<del>polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester</del>	
	<del>polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester</del>	
	<del>polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester</del>	
	<del>polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester</del>	
	<del>polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester</del>	
Adhesive	non food contact: plywood adhesives	2.0 %
Fibers:	Polyester, Nylon, Polypropylene, Acrylic and Rayon	2.0 %
Textile Finishing		0.75 %

For details in blending IONPURE WPA with these materials refer to supplemental labeling.

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(Front Panel Label)

**IONPURE WPA**

Silver-Glass

IONPURE WPA is an antimicrobial powder for commercial and industrial use designed to be incorporated into various materials during varying stages of the manufacturing process to preserve the integrity of the manufactured materials. A preservative for use in the manufacture of plastic films, interior paint, paper coatings, adhesives, and synthetic fibers. For more details of the various materials refer to the supplemental labeling for uses of Ionpure WPA. Not for use in food grade paper, paperboard product, paper coatings, and adhesives.

**ACTIVE INGREDIENT:**

Silver\* as elemental ..... 1.6%

**OTHER INGREDIENTS:** ..... 98.4%

Total ..... 100.0%

\* from silver-magnesium-aluminum-phosphate complex

**KEEP OUT OF REACH OF CHILDREN****CAUTION****PRECAUTIONARY STATEMENTS**

**HAZARD TO HUMAN AND DOMESTIC ANIMALS CAUTION:** Harmful if swallowed. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Avoid contamination of cooking utensils and food preparation surfaces.

FIRST AID	
If swallowed	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
For medical questions, emergencies or accidents involving this product call: 1-800-452-7165. Have the product container or label with you when calling a poison control center or doctor.	

**ENVIRONMENTAL HAZARD:** This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters 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.

**STORAGE AND DISPOSAL**

**STORAGE:** Do not store in areas accessible to children. Do not store in places where food or feed may come in contact with the product. Keep away from direct sunlight or humidity. Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Unused material should be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Empty container thoroughly and rinse with water. Dispose in regular trash collection.

EPA Reg.No. 73148-1

EPA Est. No. 73148-JPN-001

Net Contents: 22 lbs/10 Kg., 33 lbs/15 Kg or 44 lbs/20 Kg

Manufactured by: ISHIZUKA GLASS Co.Ltd  
11-15, Takatsuji-cho, Showa-ku,  
Nagoya, Japan  
Tel: 011 (81)-52-871-3329

(Side Panel)

# IONPURE WPA

## Silver Glass

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	APPLICATION	MC
Plastics and Films:	non food use only and no water pipes polyethylene, polypropylene, polyvinyl chloride, polyacetate, and polyester	1.5 %
Paint:	Water base and solvent base-interior only	1.5 %
Paper coating:	non food packaging paper, no food contact, not for paper production use	1.5 %
Coatings including water borne, solvent-borne, liquid, powder and 100% solids coatings for interior uses		
	non food packaging, paper products, natural and synthetic fibers and fabrics, metals, plastics, laminates, composite and building materials, barrier fabrics, furniture, automotive and vehicular parts, and glazing materials	1.5 %
Adhesive	non food contact: plywood adhesives	2.0 %
Fibers:	Polyester, Nylon, Polypropylene, Acrylic and Rayon	2.0 %
Textile Finishing		0.75 %

For details in blending IONPURE WPA with these materials refer to supplemental labeling.

(Supplemental Labeling)

**IONPURE WPA**

Silver Glass

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polymers: polyester, polyamide, polypropylene, polyethylene, polysiloxane, polyethylene copolymer, polyvinyl alcohol, epoxy resin, phenol resin, polycarbonate, cellulose acetate, polystyrene, polyurethane, acrylic resin, methyl methacrylate, acrylonitrile butadiene styrene copolymer etc.

products: gloves, shower curtains, cable wraps, protective covers, foam containers brush handles, sponges, insulators, gaskets, tubings, containers, films, furnitures etc.

**Paint**

use: not outdoor paint

type: water based or solvent based paint

**Paper coating**

use: non food packaging paper, no food contact, and not for paper production use

type: cellulosic, synthetic, speciality, reinforced papers etc.

products: wallpaper, wiping towels, book covers, corrugated paper filters etc.

**Coatings including water borne, solvent-borne, liquid, powder and 100% solids coatings for interior uses**

use: not for food contact or surfaces contacting drinking water

products including but not limited to: non-food packaging, paper products, natural and synthetic fibers and fabrics, sinks, countertops, general purpose containers, collection and storage equipment, appliances, building materials, and components (including walls, hardware, floors, ceilings and components thereof for kitchen, commercial and industrial application), equipment; wallboard, flooring materials, concrete, siding, roofing, shingles, industrial equipment, metals, plastics, furniture, automotive and vehicular parts, barrier fabrics and glazing materials

**Adhesive**

use: not for adhesives for paper or containers that will come in contact with food. products: adhesives for plywood manufacture, adhesive for cement tile and sealants etc.

**Fibers**

polymers: polyester, polypropylene, nylon, polyethylene, acrylic, rayon etc.

products for home furnishings: mattress cover pads, sheets, blankets, quilt and pillow fiber fill, curtain and drapery, carpet and its underlay, upholstery, wiping cloth, towels, bags, wallcover fabrics, cushion pads, etc.

products for apparel: interlinings, industrial uniforms, coats and aprons, sportswear, sleepwear, stockings, socks, helmets, caps, gloves etc.

products for industrial: brush bristles, shoe linings, artificial leather, filter, book covers, sail cloth, ropes etc.

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(Front Panel Label)

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Silver-Glass

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**ACTIVE INGREDIENT:**

Silver\* as elemental . . . . . 1.6%

**OTHER INGREDIENTS:** . . . . . 98.4%

Total . . . . . 100.0%

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**STORAGE AND DISPOSAL**

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EPA Reg.No. 73148-1

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