

73148-1

06/05/2007

1/6



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ishizuka Glass Co. Ltd. c/o
Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

JUN 5 2007

Attention: Jeff Jones
Regulatory Manager

Subject: IONPURE WPA
EPA Reg. No. 73148-1
Letter Dated, October 31, 2006

The following amendment, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided the following label revisions are incorporated:

A previous amendment was submitted to EPA by your company and was rejected (EPA Letter dated 10/20/06). The Agency noted at that time that you had to satisfy requirements for the technical grade active ingredient (TGAI) because your Confidential Statement of Formula (CSF) cited an unregistered source for the formulated product. You have subsequently submitted information to confirm that those requirements have been satisfied. Therefore, the Agency has no objection to the following request:

- "To add exterior paint & coating use patterns"

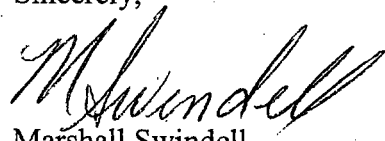
Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) and section 4(a) when the Agency requires all registrants of similar products to submit such data.

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

A stamped copy of the accepted labeling is enclosed. Submit three copies of your final printed labeling to the Agency before distributing or selling the product bearing the revised labeling.

If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062.

Sincerely,



Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510C)

(Highlighted copy
3/6

[FRONT OF BAG/BOX]

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 and exterior 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 com-
ACCEPTED WITH COMMENTS in EPA Letter Dated JUN 5 2007

KEEP OUT OF REACH OF CHILDREN

CAUTION

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No

73148-1

| FIRST AID | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>If swallowed:</i> | <ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| <i>If on skin or clothing:</i> | <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. |
| <i>If in eyes:</i> | <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. |
| HOT LINE NUMBER | |
| 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. | |

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS 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.

4/6

[FRONT OF BAG/BOX] – continued

ENVIRONMENTAL HAZARDS

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 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 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.

Manufactured by:
Ishizuka Glass Co. Ltd.
11-15, Takatsuji-cho, Showa-ku
Nagoya, Japan
Telephone: 011 (81) 52-871-3329

EPA Reg. No. 73148-1
EPA Est. No. 73148-JPN-001

NET CONTENTS: _____

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**
JUN 5 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No
73148-1

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 and exterior | 1.5% |
| Paper coating | non food packaging paper, no food contact, not for paper production use | 1.5% |
| Adhesive | non food contact: plywood adhesives | 2.0% |
| Fibers | polyester, nylon, polypropylene, acrylic and rayon | 2.0% |
| Textile Finishing | | 0.75% |
| Coatings including water-borne, solvent-borne, liquid powder and 100% solids coatings for interior and exterior 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, glazing materials, and HVAC systems | 1.5% |

**ACCEPTED
with COMMENTS
in EPA Letter Dated**

JUN 5 2007

U:
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No
73148-1

J:\clients\ishizuka\exterior paint & coatings\proposed label 27 Jun 2006

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

6/6

SUPPLEMENTAL LABELING

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 & films | <i>Use:</i> non food use only, no food contact and no water pipes <i>Polymers:</i> 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. <i>Products:</i> gloves, shower curtains, cable wraps, protective covers, foam containers, brush handles, sponges, insulators, gaskets, tubings, containers, films, furnitures, etc. |
| Paint | <i>Use:</i> interior and exterior paints <i>Type:</i> water based or solvent based paint |
| Paper coating | <i>Use:</i> non food packaging paper, no food contact, and not for paper production use <i>Type:</i> cellulosic, synthetic, specialty, reinforced papers, etc. <i>Products:</i> wallpaper, wiping towels, book covers, corrugated paper filters, etc. |
| Adhesive | <i>Use:</i> not for adhesives for paper or containers that will come in contact with food <i>Products:</i> adhesives for plywood manufacture, adhesive for cement tile and sealants, etc. |
| Fibers | <i>Polymers:</i> polyester, polypropylene, nylon, polyethylene, acrylic, rayon, etc. <i>Products for home furnishings:</i> mattress cover pads, sheets, blankets, quilts and pillow fiber fill, curtains and draperies, carpet and its underlay, upholstery, wiping cloths, towels, bags, wallcover fabrics, cushion pads, etc. <i>Products for apparel:</i> interlinings, industrial uniforms, coats and aprons, sportswear, sleepwear, stockings, socks, helmets, caps, gloves, etc. <i>Products for industrial:</i> brush bristles, shoe linings, artificial leather, filter, book covers, sail cloth, ropes, etc. |
| Textile Finishing | <i>Products:</i> various surface resin coating textiles |
| Coatings including water-borne, solvent-borne, liquid powder and 100% solids coatings for interior and exterior uses. | |
| | <i>Use:</i> not for food contact surfaces contacting drinking water <i>Products including (but not limited to):</i> 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 equipment (including walls, hardware, floors, ceilings and components thereof for kitchen, commercial and industrial application), wallboard, flooring materials, concrete, siding, roofing, shingles, industrial equipment, metals, plastics, furniture, automotive and vehicular parts, barrier fabrics and glazing materials, spas, bathtubs, showers, and filters and components thereof |
| | <i>Use:</i> original equipment manufacturing of heating, ventilation and air conditioning (HVAC) equipment and related materials (including insulation, ducts, heat exchangers, drain pans, air filters, air purifiers, diffusers, and parts and components thereof) |
| | <i>Use:</i> coatings used to upgrade non-residential heating ventilation and air conditioning equipment and related materials (including insulation, ducts, heat exchangers, drain pans, air filters, air purifiers, diffusers, and parts and components thereof) |

The purpose of incorporating IONPURE WPA in coatings intended for HVAC applications is to inhibit the growth of mold, mildew, fungus, and bacteria that cause odor, discoloration, staining, deterioration, and corrosion on the coated surface. IONPURE WPA does not protect the underlying substrate and is not intended to inhibit the growth of public-health related organisms.

ACCEPTED
with COMMENTS
in Final Label Revision

JUN 5 2007

ORIGINAL AND FINAL USE: Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No 73148-1