

73148-1

03/17/2010

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

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

MAR 17 2010

Attention: Jeff Jones

Subject: IONPURE WPA
EPA Registration No. 73148-1
Amendment Dated February 24, 2010

This will acknowledge receipt of your, submitted under the provisions of FIFRA Section 3(c)(9).

Proposed Notification:

- To update Storage and Disposal language per PR Notice 2007-4

General Comment:

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

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file

If you have any questions or comments concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,

A handwritten signature in cursive script that reads "Martha Terry".

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

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

1. Company/Product Number 73148-1	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ishizuka Glass Co., Ltd. / Ionpure WPA	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Ishizuka Glass Co., Ltd. c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - explain below.
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification per PR Notice 2007-4 to update the Storage and Disposal language.
 Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 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 <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted.		If "Yes," Unit Package wgt. No. per container	

3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container	5. Location of Label Direction <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
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 _____		


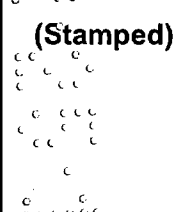
Section - IV

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) 301-680-7971
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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 kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Agent, Ishizuka Glass Co., Ltd.	6. Data Application Received (Stamped) 
4. Typed Name Jeff Jones	5. Date February 24, 2010	



February 24, 2010

Document Processing Desk (NOTIF)
 Office of Pesticide Programs (7504P)
 Environmental Protection Agency
 One Potomac Yard
 2777 S. Crystal Drive, Room S-4900
 Arlington, VA 22202

Attn: Marshall Swindell PM 33

Re: Notification per PR Notice 2007-4; Update of Storage and Disposal language
Product: Ionpure WPA
EPA Reg. No.: 73148-1
Company: Ishizuka Glass Co., Ltd.

Dear Marshall:

On behalf of Ishizuka Glass Co., Ltd., I am submitting a label notification per PR Notice 2007-4 to update container language in the Storage and Disposal section of the label for the product, Ionpure WPA, EPA Reg. No. 73148-1.

Ishizuka Glass Co. packages all of its products in cardboard boxes with a polyethylene lined aluminum pouch/bag inside. Language covering this type of packaging was approved for Ionpure ZAF MS, EPA Reg. No. 73148-7. An identical statement has been used to update the Storage and Disposal statement of this product, Ionpure WPA. No other changes have been made to the label.

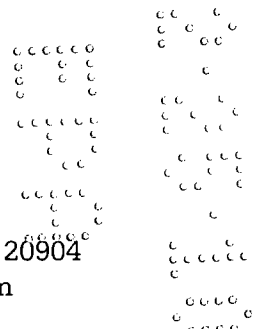
Enclosures

- EPA form 8570-1
- 1 copy of the label with revisions highlighted

If you have any questions regarding this submission, please contact me at 301-680-7971 or jjones@delta-ac.com.

Sincerely,

Jeff Jones, Agent
 Ishizuka Glass Co., Ltd.



IONPURE WPA

Silver-Glass

Active Ingredients
 Silver⁺ elemental 1.6%
 Other Ingredients 98.4%
 Total 100.0%
 *from silver-magnesium-aluminum phosphate complex

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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.

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
If swallowed:	<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.
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.
<p>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.</p>	

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 & Films	non food contact applications* in polyethylene, polypropylene, polyvinyl chloride, polyacetate and polyester	6.0%
Paint	water base and solvent base interior and exterior	1.5%
Paper coating	non food contact packaging paper*, not for paper production use	1.5%
Adhesive	non food contact applications* including 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%

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.

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

Do not contaminate water, food, or feed by storage and disposal.
PESTICIDE 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. In case of spill, collect material and dispose of it as specified below. **PESTICIDE DISPOSAL:** Unused materials should be disposed of on site or at an approved waste disposal facility. **CONTAINER DISPOSAL:** Non refillable container. Do not reuse or refill this container. Empty bag completely and dispose in regular trash collection. Offer cardboard container for recycling if available or dispose in regular trash collection.

*See Supplemental Labeling for food contact applications

For details in blending IONPURE WPA with these materials refer to Supplemental Labeling.

Manufactured by:
 Ishizuka Glass Co. Ltd.
 1880 Kawai-cho, Iwakura City
 Aichi, Japan
 Telephone: (+81) 587-37 3251

NET CONTENTS:

IONPURE WPA Silver-Glass

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.

Plastics & Films	<p><i>Use:</i> non food contact plastics and films*</p> <p><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.</p> <p><i>Products:</i> gloves, shower curtains, cable wraps, protective covers, foam containers, brush handles, sponges, insulators, gaskets, tubings, containers, films, furnitures, etc.</p>
Paint	<p><i>Use:</i> interior and exterior paints</p> <p><i>Type:</i> water based or solvent based paint</p>
Paper Coating	<p><i>Use:</i> non food packaging paper*; not for paper production use</p> <p><i>Type:</i> cellulosic, synthetic, specialty, reinforced papers, etc.</p> <p><i>Products:</i> wallpaper, wiping towels, book covers, corrugated paper filters, etc.</p>
Adhesive	<p><i>Use:</i> non food contact adhesives for paper or containers*</p> <p><i>Products:</i> adhesives for plywood manufacture, adhesive for cement tile and sealants, etc.</p>
Fibers	<p><i>Polymers:</i> polyester, polypropylene, nylon, polyethylene, acrylic, rayon, etc.</p> <p><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.</p> <p><i>Products for apparel:</i> interlinings, industrial uniforms, coats and aprons, sportswear, sleepwear, stockings, socks, helmets, caps, gloves, etc.</p> <p><i>Products for industrial:</i> brush bristles, shoe linings, artificial leather, filter, book covers, sail cloth, ropes, etc.</p>
Textile Finishing	<p><i>Products:</i> various surface resin coating textiles</p>
Coatings including water-borne, solvent-borne, liquid powder & 100% solids coatings for interior & exterior uses.	
	<p><i>Use:</i> not for food contact coatings and surfaces*</p> <p><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</p>
	<p><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)</p>
	<p><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)</p>
	<p>The purpose of incorporating IONPURE WPA in coatings is intended for HVAC applications to inhibit the growth of mold, mildew, fungus, and bacteria that cause odor, discoloration, staining, deterioration or corrosion on the coated surface. IONPURE WPA does not protect the underlying substrate and is not intended to inhibit growth of public-health related organisms</p>

Food Contact Uses

Incorporate IONPURE WPA as an antimicrobial additive at or below the indicated maximum concentration into the polymeric manufactured products listed below that are used for manufacturing, packing, packaging, transporting, handling and/or holding food if such use is not intended to have any antimicrobial effect in the food itself. Do not incorporate IONPURE WPA into any food or drinking water contact application listed on this label without first incorporating IONPURE WPA into a polymer which is approved, with associated use conditions, for food contact in 21 CFR 174-186 (inclusive) as amended, or in the United States Food and Drug Administration's Food Contact Substance Notification System, as amended.

Plastics & Films	<p><i>Use:</i> Food contact sheets, slabs and molded plastic parts</p> <p><i>Products:</i> Appliances and equipment, beverage dispensing equipment, beverage processing equipment, bottles, brush bristles, brush handles, containers, conveyor belts, countertops, food handling equipment, food processing equipment, food storage containers, food trays and covers, food packaging, food processing utensils, gaskets, general purpose containers, kitchen and bathroom hardware liners, mats, non-woven fabrics, plastic film, plumbing suppliers and fixtures, protective covers, sinks, sponges, tape, tiles, tubing.</p> <p><i>Maximum Concentration:</i> 2.0%</p>
Fibers	<p><i>Use:</i> Food contact apparel and other goods, manufactured from fibers</p> <p><i>Products:</i> Apparel (such as outerwear, uniforms, gloves, aprons, coats), bags, containers, conveyor belts, table cloths, napkins, wiping cloths, mops, sponges, brush bristles, filters, packaging (including bags, sacks, wraps, cushions, absorbent materials and containers), commercial and industrial wipes and fabrics for kitchen use, food packaging</p> <p><i>Maximum Concentration:</i> 2.0%</p>
Coatings, Films & Laminates	<p><i>Use:</i> Food contact coatings, films and laminates</p> <p><i>Products:</i> Appliances and equipment, barrier fabrics, building materials and components, collection and storage equipment (such as conveyor belts, piping systems, silos, tanks and process vessels), cookware, countertops, food wrap (including coated deli paper, coated meat interleavers and plastic wrap), general purpose containers, glazing for cement tile, glazing for vitreous china used in plumbing fixtures (such as sinks and countertops), industrial equipment, natural and synthetic fibers and fabrics, packaging, paper products (such as wipes, tissues, wall coverings, towels), plastic film, sinks</p> <p><i>Maximum Concentration:</i> 2.0%</p>
Adhesives & Sealants	<p><i>Use:</i> Food contact adhesives and sealants</p> <p><i>Products:</i> Appliances, cardboard, ceramic tile, grout and joint compound, paper, pipe sealant, and insulating materials, plastic plumbing adhesives, rubber, sealants for pipes, wood, wood and plastic composites</p> <p><i>Maximum Concentration:</i> 2.0%</p>

Drinking Water Contact Uses

IONPURE WPA is permitted for the human drinking water contact uses listed below. The additive is permitted for use in food bowls and water bowls, and other containers used by domestic animals. Do not use for any food or drinking water applications involving non-domestic animals.

	<p><i>Use:</i> Plastics, fibers, coatings, films, laminates, adhesives and sealants</p> <p><i>Products:</i> Including ice making equipment (water pans, piping, tubing, guards, ice storage bins, trays, ice scoops, buckets, valves and gaskets), drinking water contact materials (water bottles, cups, gaskets, plumbing fixtures, storage tanks and vessels, water piping, tubing valves, spigots, coolers, water dispensing components, housing units, and water filter components)</p> <p><i>Maximum Concentration:</i> 2.0%</p>
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