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



Office of Pesticide Programs

JUN 15 2010

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

Attention: Jeff Jones, Agent

Subject: IONPURE WPA
EPA Registration No. 73148-1
Amendment Dated April 27, 2010

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment:

- Minor Labeling Changes

General Comments:

A copy of the stamped "accepted" labeling is enclosed for your records.

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

Sincerely

A handwritten signature in cursive script that reads "M Swindell".

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

Enclosure

IONPURE WPA

Silver-Glass

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

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

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.

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.
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.	

	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	5.0%
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	5.0%

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.

ACCEPTED with COMMENTS
EPA Letter Dated:
Manufactured by: Iwakura Glass Co. Ltd.
1880 Kawai-cho, Iwakura City
Aichi, Japan
Telephone: (+81) 587 37 3251

JUN 15 2010

NET CONTENTS:

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 73148/

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	<i>Use:</i> non food contact plastics and films* <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*; 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> non food contact adhesives for paper or containers* <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 & 100% solids coatings for interior & exterior uses.	
	<i>Use:</i> not for food contact coatings and surfaces* <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 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

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	<i>Use:</i> Food contact sheets, slabs and molded plastic parts <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. <i>Maximum Concentration:</i> 2.0%
Fibers	<i>Use:</i> Food contact apparel and other goods, manufactured from fibers <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 <i>Maximum Concentration:</i> 2.0%
Coatings, Films & Laminates	<i>Use:</i> Food contact coatings, films and laminates <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 <i>Maximum Concentration:</i> 2.0%
Adhesives & Sealants	<i>Use:</i> Food contact adhesives and sealants <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 <i>Maximum Concentration:</i> 2.0%

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.

<i>Use:</i> Plastics, fibers, coatings, laminates, adhesives and sealants <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, tubing, piping, fixtures, storage tanks and vessels, water piping, tubing valves, spigots, coolers, water dispensing components, housing units, and water filter components) <i>Maximum Concentration:</i> 2.0%
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AG OPENING WITH COMMENTS EPA Letter Dated: JUN 15 2010