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

JUN 2 3 2011

SEPA United States Environmental Protection Office of Pesticide Programs

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

Attention: Jeff Jones

73148-1

Subject: IONPURE WPA EPA Registration No. 73148-1 Notification Dated May 24, 2011

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

Proposed Notification:

- To add an indoor, nonfood site to the product label

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,

Marshall Swind

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

Please read instructions on reverse befor	e completing :	For.	Form Appr		o. 2070-0060.	2055
EPA		Environmenta	ited States I Protection Agency gton, DC 20460	□ Regis □ Amen X Other		OPP Identifier Number
		Application for	Pesticide - Section I			
1. Company/Product Number 73148-1			2. EPA Product Manager Swindell		3. Proposed Classification □ None □ Restricted	
4. Company/Product (Name) IONPURE WPA			РМ# 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			6. Expedited Review. In ac similar or identical in compositio EPA Reg. No Product Name	n and labeling	lo:	
		Se	ction - II		•••••	
 Amendment - Explain below Resubmission in response to Agency letter dated X Notification - Explain below. 			 □ Final printed labels in respons □ "Me Too" Application. □ Other - explain below. 	se to Agency le	tter dated	
Notification per PR Notice 98-10 This notification is consistent with the labeling or the confidential statement statement to EPA. I further understand in violation of FIFRA and I may be sub	provisions of of formula of a d that if this n	PR Notice 98-10 and E his product. I understa otification is not consist ement action and pena	PA regulations at 40 CFR 152 and that it is a violation of 18 U tent with the terms of PR Notic lities under sections 12 and 14	,46, and no o .S.C. Sec. 10 e 98-10 and	ther changes 01 to willfully	make any false
		Se	ction - III			
1. Material this Product will be Packaged i Child-Resistant Packaging ☐ Yes* X No	n: Unit Packag □ Yes X No Unit Packag	Yes Metal X No Glass		c		
* Certification must be submitted.		container	Unit Package wgt. No. per c	ontainer	X Other Cardboard box lined with polyethylene bag	
3. Location of Net Contents Information X Label X Container		4. Size(s) of Retail Con 15 kg 20 kg	tainer	X On Lab	of Label Direction el eling accompa	
6. Manner In Which Label Is Affixed to Pro	duct	□ Lithograph X Paper glued □ Stenciled	□ Other	•		
			ction - IV			
1. Contact Point (Complete items directly b	elow for identii	ication of individual to be	contacted, if necessary, to process	s this applicatio	n.)	· · · · · · · · · · · · · · · · · · ·
Name Jeff Jones			^{Title} Agent Ishizuka Glass Co., L¹	Telephone No. (Include Area Code) 301-680-7971		
I certify that the statements I have made o of knowingly false or misleading statement		all attachments thereto ar		acknowledge th	L	6. Date Application
2. Signature			3. Title Agent, Ishizuka Glass	s Co., Ltd.	، د د د د د د د د د د د د د د د د د د د	
4. Typed Name Je	ff Jones		5. Date May 24, 201	1		د د د د ر ر د
EPA Form 8570-1 (Rev. 8-94) Previou	s editions are	obsolete.	I White	e - EPA File Co	opy (original)	Yellow - Applicant c



May 24, 2011

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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 98-10, Section II C; Adding an Indoor, Nonfood Site for an Antimicrobial Product

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 98-10 to add use sites to the label of Ionpure WPA, EPA Reg. No. 73148-1. The use sites added meet all the notification requirements specified in Section II C, Adding an Indoor, Nonfood Site for an Antimicrobial Product, of PR Notice 98-10. No other changes have been made to the label.

Enclosures

- EPA form 8570-1
- 2 copies of the label, one 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.



12510 Prosperity Drive Suite 160 Silver Spring, Maryland 20904 (301) 680-7971 fax (301) 680-7975 www.delta-ac.com

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**.

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

If swallowed:	 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:	 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:	 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.

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.

EPA Reg. No. 73148-1

EPA Est. No. 73148-JPN-001

ISH/WPA.ESL061510Rev052411

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	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%

*See Supplemental Labeling for food contact applications

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

Manufactured by: Ishizuka Glass Co. Ltd. 1880 Kawai-cho, Iwakura City Aichi, Japar. 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.

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Plastics & Films	Use: non food contact plastics and films* 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: computers, laptops, and accessories (stationary, mobile and handheld) including processors (CPUs), monitors, stands, and peripherals to include keyboards, mouse, touch pad, touch tablet, graphic tablet, and trackballs and other input/output devices; electronics and gaming equipment (stationary, portable, mobile, and handheld) and displays and their accessories, including consoles, headsets, controllers and other input/output devices; communication equipment (stationary, mobile, and handheld) including telephones, headsets, handsets, intercoms, earphones, and microphones and other input/output devices; gloves, shower curtains, cable wraps, protective covers, foam containers, brush handles, sponges, insulators, gaskets, tubings, containers, films, furnitures, etc.	
Paint	Use: interior and exterior paints Type: water based or solvent based paint	
Paper Coating	Use: non food packaging paper*; not for paper production use Type: cellulosic, synthetic, specialty, reinforced papers, etc. Products: wallpaper, wiping towels, book covers, corrugated paper filters, etc.	
Adhesive	Use: non food contact adhesives for paper or containers* 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, quilts and pillow fiber fill, curtains and draperies, carpet and its underlay, upholstery, wiping cloths, 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	

Coatings including water-borne, solvent-borne, liquid powder & 100% solids coatings for interior & exterior uses.

Use: not for food contact coatings and surfaces*

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 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

Use: 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)

Use: 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	Use: Food contact sheets, slabs and molded plastic parts Products: 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. Maximum Concentration: 2.0%		
Fibers	Use: Food contact apparel and other goods, manufactured from fibers Products: 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 Maximum Concentration: 2.0%		
Coatings, Films & Laminates	Use: Food contact coatings, films and laminates Products: 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 Maximum Concentration: 2.0%		
Adhesives & Sealants	Use: Food contact adhesives and sealants Products: 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 □aximum Concentration: 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 fcod or drinking water applications involving non-domestic animals.

Use: Plastics, fibers, coatings, films, laminates, adhesives and sealants **Products:** Including ice making equipment (water pans, pring, 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 **Maximum Concentration:** 2.0%