



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 4, 2004

Thomas C. McEntee
Vice President, Regulatory Compliance
Micropel Corporation
71 Carolyn Blvd.
Farmingdale, NY 11735

Subject: Micropel 2 DIDP
EPA Registration No. 80199-6
Application Dates: January 30, 2004 and February 2, 2004

Dear Mr McEntee:

The following amendments, submitted under connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FFIRA), as amended, are acceptable:

Proposed Amendment

- Revised First Aid Statements per PR Notice 2001-1
- Alternate Formulas #5 and #6 (see Alternate CSFs dated 4/5/04)

Label Comments

Revise the label as follows:

1. Revise the First Aid Statements by removing the statement "Call a poison control center or doctor for further treatment advice." from the "Note to Physician" section and placing it in the "If In Eyes" section.
2. Revise the Environmental Hazards Statement by deleting the word "unless" from the statement "...and unless the permitting authority has been notified in writing prior to discharge."

CONCURRENCES

SYMBOL	7510						
SURNAME	[Signature]						
DATE	5-4-04						

3. Revise the Storage and Disposal Statements by using the following format:

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Do not store in the presence...

Pesticide Disposal: Pesticide wastes...

Container Disposal: Completely empty liner...

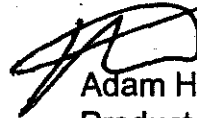
General Comments

The Alternate Confidential Statements of Formula (CSFs), dated April 5, 2004, are acceptable and copies have been inserted in your file for future reference.

A stamped copy of the labeling accepted with conditions is enclosed. Submit three(3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)

MICROPEL™ 2 DIDP

Bacteriostatic & Fungistatic Additive for Plastics

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAY - 4 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **80199-6**

Active Ingredient:	
10,10'-oxybisphenoxarsine	2.0 %
(Total arsenic as elemental As-0.6%)	
(Water soluble arsenic as elemental As-	
less than 0.01%)	
Inert Ingredients:	98.0%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN
DANGER

READ THIS LABELING BEFORE USING

EPA REGISTRATION NO. 80199-6
EPA EST. REGISTRATION NO. 072899-VA-001

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled. Harmful if swallowed. Do not get in eyes, on skin or clothing. Do not breathe vapor or spray mist. Wear goggles or face shield, protective clothing and rubber gloves, a mask or a pesticide respirator jointly approved by MSHA (Mine Safety and Health Administration) and NIOSH (National Institute of Occupational Safety and Health). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Prolonged and frequently repeated contact may cause allergic reaction in some individuals.

See right panel for additional precautions.

FIRST AID

IF SWALLOWED	Call 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 IN EYES	Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye.
IF ON SKIN OR CLOTHING	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for further treatment advice.
IF INHALED:	Move person to fresh air. If person is not breathing, call 911, or an ambulance, then give artificial respiration, preferably by mouth to mouth, if possible. Call a poison control center or doctor for further treatment advice.
NOTE TO PHYSICIAN:	Call a poison control center or doctor for further treatment advice. Probable mucosal damage may contraindicate the use of gastric lavage.
HOT LINE NUMBER:	Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1 - 800 - 222- 1222 for emergency medical treatment information.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, birds and mammals. 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 unless the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment authority. For guidance contact your State Water board or Regional Office of EPA.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage.

Pesticide Storage: Do not store in the presence of food or feed. OBPA that cannot be used according to label instructions must be disposed of according to Federal or approved State procedures under subtitle C of the Resource Conservation and Recovery Act. (RCRA).

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

DIRECTIONS FOR USE

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

NOTICE TO USER: This product should not be used on items which come into contact with foodstuffs not items of clothing or infant wear. Restriction encompass all food grade paper coatings, paper and paperboard and adhesives.

Products containing MICROPEL 2 DIDP may not make claims of antimicrobial activity other than protection of the article itself against growth of bacteria and mold in the treated article.

MICROPEL 2 DIDP is a formulation of 10,10'-oxybisphenoxarsine specifically designed for compatibility with flexible vinyl systems. It may also be used as a preservative in plastic products, adhesives, coatings and specialty products, textiles and textile fibers, and resin, latex and polymer emulsions. Please consult the Technical Use Bulletin on MICROPEL 2 DIDP for full information.

A level of 1.5% MICROPEL 2 DIDP based on total weight of the final treated product will give excellent control against bacteria and mold organisms. For certain items which may be subjected to extended outdoor weathering, a level of 2.5% should be evaluated.

Do not use MICROPEL 2 DIDP where the treated plastic materials can come in contact with humans or pets or be used as food or feed packing material or as food contact surfaces.

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and/or handling of this material when such use and/or handling is contrary to label.

Lot No. _____ ss Weight _____ Tare Weight _____ Net Weight _____