UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

October 5, 2004

Carrie M. Buck Product Registration Coordinator Micropel, LLC P.O. Box 434 Florham Park, NJ 07932

Subject:

Micropel 5 PVC-F

EPA Registration No. 81348-7

Application Dates: August 26, 2004 EPA Received Dates: August 27, 2004

Dear Ms. Buck:

The following amendment, submitted under connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

Proposed Amendment

Revised labeling

Conditions

Revise the label as follows:

- Revise the "If In Eyes" section to include the statement "Call a poison control center or doctor for treatment advice."
- 2. With respect to the technical use bulletin, delete the word "Usually" in the second to the last paragraph on page 1. The statement contradicts the precautionary statements. We will accept the statement "It is recommended that rubber gloves and goggles be used when handling."

CONCURRENCES						
SYMBOL			*********			
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JATE) (8-15-04)						
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EPA Form 1320-1A (1/90)

Printed on Recycled Paper

General Comments

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,

Atam Heyward

Product Manager 34

Regulatory Management Branch II Antimicrobials Division (7510 C)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes burns. Do not get in eyes, on skin or on clothing. Wear protective clothing and rubber gloves. Harmful if swallowed or absorbed through the skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and was before use.

See right panel for additional precautions and refer to the Technical Bulletin for additional directions for use.

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 15-20 minutes.			
<u>}</u>	Remove contact lenses, if present, after			
	the first 5 minutes, then continue rinsing			
	the eye.			
IF ON SKIN OR	Take off contaminated clothing.			
CLOTHING:	Rinse skin immediately with plenty of			
	water for 15-20 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			
<u> </u>	further treatment advice.			
Hove the product contain	HOTLINE 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-				
	ical treatment information.			
NOTE TO PHYSICIAN:				
Probable mucosal damag	e may contraindicate the use of gastric lavage.			

MICROPEL M 5 PVC F

Solid Resin Carrier
Bacteriostatic & Fungistatic Additive for Plastics

EPA Reg. No. 81348-7 EPA Est. No. 16-VA-1

ACTIVE INGREDIENT:

10,10'-oxybisphenoxarsine	5.0%
(total arsenic as elemental As-1.5%)	
(Water soluble arsenic as elemental As-less than 0.01	%)
INERT INGREDIENTS	95.0%
TOTAL	

KEEP OUT OF REACH OF CHILDREN

DANGER

READ THIS LABELING BEFORE USING FOR ADDITIONAL INFORMATION SEE BULLETIN

ACCEPTED
with COMMENTS
FEPA Letter Dated:
007 - 5 2004

Under the Federal Insecticide, Fungicide, and Rode natide Act as amended for the personae, registered under EP. And No. 81348-7

MICROPEL LLC P.O. Box 434 Florham Park, New Jersey 07932

Net Weight:

ENVIR INMENTAL H

This pesticide is toxic to fish, aquational discharge effluent containing this por other waters unless in accordance Discharge Elimination System (NP notified in writing prior to discharge into sewer systems without previous For guidance contact your State was

DIRECTIONS FOR US

It is a violation of Federal Law to t labeling.

Interior application: Such as PVC upholstery, interior automotive gas 0.0% of Micropel 5 PVC F based ucompound) Exterior applications: awnings, ditch and pond liners, ma Micropel 5 PVC F based upon the

NOTICE TO USER: This product contact with foodstuffs, nor items of all food grade paper coatings, paper

Note: Please refer to Technical Bu product.

STO

Do not contaminate water, food, or PESTICIDE STORAGE: Do not st cannot be used according to label in or approved State procedures under Recovery Act (RCRA).

PESTICIDE DISPOSAL: Pesticide of excess pesticide, spray mixture, of wastes cannot be disposed of by use Pesticide or Environmental Control the nearest EPA regional office for CONTAINER DISPOSAL: Completion to loosen clinging particles. dispose of liner in sanitary landfill authorities. If drum is contaminate manner.

Seller makes no warranty, express other than indicated on the label. I this material when such use and/or

Florham Park, New Jersey 07932

TECHNICAL USE BULLETIN **MICROPEL 5 PVC-F** Antimicrobial Additive for Plastics

PRODUCT DESCRIPTION

MICROPEL 5 PVC-F is a concentrate of 10,10'-Oxybisphenoxarsine (OBPA) in a polymeric resin carrier. The product, supplied as a homogeneous solid in pelletized form, is recommended for PVC and other polymeric compositions requiring preservation from fungal and bacterial deterioration. Low levels of MICROPEL 5 PVC-F will provide long term preservation from fungal and bacterial attack and will help prevent surface growth, permanent staining, embrittlement and premature product failure.

TYPICAL PROPERTIES

Composition:

10.10'-Oxybisphenoxarsine

Inert Carriers:

Pellet Size:

Bulk Density: Appearance:

Torque Rheometer Viscosity:

Glass Transition Temperature

5%

~95%

Approximately 1/16" x 1/16"

40-45 lbs./cu.ft.

Off White Pellets

620 meter-grams

63°C (145°F)

APPLICATION

MICROPEL 5 PVC-F antimicrobials are recommended for polyvinyl chloride, polyurethane, silicone and latex polymers. Applications include:

Vinyl film and sheeting - pool liners, pond liners, ditch liners, waterbed liners, shower curtain protective covers, mats, insulators, barrier films.

Extruded profiles - automotive moldings, weather stripping, appliance gasketing, wire and cable jacketing, foam gaskets, floor moldings.

Plastisols - vinyl flooring, laminating adhesives for industrial coated fabrics, adhesives for windows, grout and pipe sealants, sail cloth.

Molded goods - vinyl floor tile, waste containers, injection molded automotive parts, shoe soles. Coated fabrics - wall coverings, upholstery, pillow and mattress ticking, backlit signs, awnings, tents, tarpaulins, protective covers, aprons, barrier fabrics.

Coatings/Sealants - industrial urethane coatings, artificial leather, sail cloth, raincoats, silicone caulks for bathroom and industrial use, carpet backing.

Foams - pillow and mattress foam, carpet underlay, gasket, shoe soles.

The most commonly used methods for preserving plastics against fungal and bacterial attack are to add liquid solutions of OBPA (such as the MICROPEL 5 Series) or to add the pure active ingredient in a powdered or granular form. Concentrated powders/granulars are quite toxic and must be handled with extreme caution; they also can cause contamination of processing equipment.

Liquid systems eliminate the dusting problem, but rubber gloves and goggles are usually recommended in their handling.

MICROPEL 5 PVC-F not only eliminates dusting problems, but it reduces the need for special handling. It is compatible with most thermoplastic resins and will not discolor or detract from the product's chemical or physical properties.

MICROPEL 5 PVC-F can be incorporated into the resin compound at any convenient stage of the manufacturing process. The product can be fed into an extrusion operation in much the same way as pelletized color concentrates or other such additives. Since it is soluble in most common coating and printing ink solvents, it can be added directly to them. OPBA, the active ingredient, is resistant to leaching and is non-volatile at normal coating and plastic processing and use temperatures. Properly formulated compounds containing it will resist fungal and bacterial deterioration after long term exposure to heat and severe weathering conditions.

For those processors and compounders unable to use MICROPEL 5 PVC-F in the pellet form, other MICROPEL bacteriostatic and fungistatic compounds are available as 5% active solutions in various plasticizers and solvents (DIDP, DOP and PPG). This product should not be used in treated articles, which are intended to contact food or drinking water.

RECOMMENDED USE LEVELS

Effective preservation against the growth of bacteria and fungi can be obtained using low levels of MICROPEL 5 PVC-F. The addition level is dependent upon the fungal and bacterial susceptibility of the product, the amount of preservation required, the ultimate use of the product and the degree of exposure to outdoor weathering or other conditions favorable for fungal and bacterial growth.

The recommended use levels are based upon actual tests conducted or general experience with exposure of the products to actual conditions. FUNGAL AND BACTERIAL SUSCEPTIBILITY TESTING AND TECHNICAL ASSISTANCE FOR YOUR SPECIFIC REQUIREMENTS ARE AVAILABLE FROM MICROPEL, LLC.

Interior Applications such as PVC floor and wall coverings, coated fabrics for upholstery, interior automotive parts, refrigerator gaskets, shower curtains and mattress covers – use 0.6% of MICROPEL 5 PVC-F based upon the total weight of the formulation (6 lbs/1000 lbs. of compound). Exterior Applications such as automotive landau tops, exterior automotive trim, tarpaulins, awnings, ditch and pool liners, marine upholstery, swimming pool liners – use 1.0% of MICROPEL 5 PVC-F based upon the total weight of formulation (10 lbs/1000 lbs. of compound).

Fungal and bacterial activity under sever outdoor exposure is influenced by the overall weatherability of the plastic system. Recommendations on formulation parameters for products subjected to long term outdoor exposure are available from Micropel, LLC.

TOXICOLOGY

Based upon toxicological studies, MICROPEL 5 PVC-F has been classified as falling in category 1 of the Section 3 regulations of the FIFRA Act as amended in 1972 on the basis of eye and skin effects. The precautionary statements specified for this category are printed on the product label.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Remove empty polyethylene liners from the drum and incinerate the liner or dispose with other refuse. Empty drums may be reconditioned and recycled. Alternatively, crush fiber drums and incinerate or dispose with other refuse. Metal drums that cannot be reconditioned and recycled, should be crushed and disposed in landfill.

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.

EPA REQUIRES THAT ANY PESTICIDE PRODUCT SHOULD ONLY BE USED AS SPECIFIED ON THE CONTAINER LABEL.

Standard Package

25 kilos net fiber drum 350 lbs. net steel drum