

82077-2

01/24/2008

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

JAN 24 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Robert Dahl
CEO
DuraBan International Inc.
230 Capitol Drive, Suite 300
Buffalo, MN 55313.

Subject: DuraLast-I
EPA Registration 82077-2
Amendment Dated: Oct 03, 2007
EPA Received Date: Oct 26, 2007

Dear Robert Dahl

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

Proposed Amendment

- Revised Label
- Response to letter dated Jan 11, 2007

General Comments

The revisions to the label as listed above are acceptable. A stamped copy of the accepted label is enclosed for your records. Submit (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Velma Noble at (703) 308-6233.

Sincerely,

CONCURRENCES

SYMBOL	7510c								
SURNAME									
DATE	1-22-08								

Velma Noble

Product Manager (31)

Regulatory Management Branch

Antimicrobial Division (7510c)



DURABAN-I
ANTIMICROIBAL AGENT
For Manufacturing Use Only

Active Ingredient:	3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride	5.0%
Other Ingredients:	95.0%
TOTAL		
INGREDIENTS:	100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

EPA Reg. No. 82077-2

EPA EST. 82077-MN-001

NET CONTENTS: 2, 4, 8, 16, 20, 22, 32 or 36 fluid oz.; 1, 5, 55, 150, 250, 275 gal. or 5500 gal (tanker qty) Lot No. _____

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

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, and then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF ON SKIN:

- 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 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 a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

ACCEPTED

JAN 24 2008

Under the Federal Insecticide, Fungicide, and
Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. **82077-2**

An antimicrobial agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

b/c

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes or on clothing. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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.

Every Effort should be made to contain accidental spills of DURABAN-I to the immediate area. This may be accomplished by the use of sandbags or barrier material to confine the spill to facilitate cleanup and disposal. Contaminated sands or barrier material may then be disposed of by burial in an approved landfill. Many spills may be cleaned up with rags or other absorbent materials by wiping, soaking and/or mopping and allowing the liquid to absorb onto the material. The absorbent material may then be disposed of by incineration or landfill. Floor drains in areas of material use should be protected with absorbent material or barrier material to contain accidental spills.

De-activation may be required during clean up if a spill occurs. De-activation of DURABAN-I can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of DURABAN-I.

PRODUCT FEATURES AND BENEFITS

DURABAN-I imparts durable biostatic activity to the surfaces of a wide variety of substrates.

DURABAN-I is effective against mold, mildew and algae as an antimicrobial agent.*

Increased efficiency- through proper application, durable bacteriostatic, fungistatic and algistatic surfaces can be attained with a minimum amount of DuraBan-I.

Provides freshness and combats deterioration and discoloration caused by bacteria, fungi and algae.

DIRECTIONS FOR USE

For Manufacturing Use Only. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use.

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

Do not use in any application involving direct or indirect food or drinking water contact.

For use in Formulating, Manufacturing, and Fabricating of Treated Article Products Specified under "approved uses." DURABAN-I is for use in materials that are incorporated into manufactured products at the point of manufacture. The final article may contain from 0.1 to 1.0% by weight active ingredient.

FOR INDUSTRIAL USE ONLY

This product is registered for formulation into Antimicrobial Products or as a microbiostatic agent for material preservation; neither this product nor the articles treated with this product may state or imply any public health claims. Articles or substances treated with this product will be exempt from FIFRA regulation pursuant to 40 CFR 152.25 (a) if the intended use for incorporating this material into a treated article or substance is for the protection of the article or substance itself.

APPROVED USES

The active ingredient in DURABAN-I is effective against fungi (including mold and mildew) and algae as a static agent. DURABAN-I can be used for incorporation into and treatment of the following items or substrates to impart bacteriostatic, fungistatic and algistatic activity. Increased efficiency through proper application, durable bacteriostatic, fungistatic and algistatic surfaces can be attained with a minimum amount of DuraBan-I. Provides freshness and combats deterioration and discoloration caused by bacteria, fungi and algae. DURABAN-I may be applied to or incorporated into manufactured products listed below for use in industrial, institutional, commercial or residential locations for non-food contact uses:

BUILDING MATERIALS AND COMPONENTS – Interior structural wood as defined as only wood needed for basic building structure as found in the dried-in stage of construction, including wood in direct contact with foundations, interior and exterior wall sill plates, wood studs, wood or cellulosic sheathing, flooring joists and sub-flooring. (not to be used in ground contact applications, landscape timbers, docks, boardwalks, decking and deck furniture or other dimensional lumber), metal, plastic, concrete and concrete products, cinder blocks, brick, stone, siding, wall board, insulation, ceiling tiles, architectural metal, louvers and vents and coping

DURABAN-I may be used in materials that are incorporated into manufactured products at the point of manufacturing. The final article may contain from 0.1% to 1.0% by weight active ingredient. Contact DuraBan International, Inc. to determine the specific rates within this range for individual finished products.

MOLD AND MILDEW CONTROL IN WALLBOARD, CONCRETE AND MASONRY (CINDER) BLOCK CONSTRUCTION (used in the Manufacture of construction products), INTERIOR STRUCTURAL WOOD COMPONENTS (wood as defined as only wood needed for the basic building structure as found in the dried-in stage of construction including wood in dried contact with foundations, interior and exterior wall sill plates, wood studs, wood or cellulosic sheathing, floor joists and sub flooring), (not to be used in ground contact applications, landscape timbers, docks, boardwalks, decking and deck furniture or other dimensional lumber)

DURABAN-I is used to treat interior structural wood components, (wood as defined as only wood needed for the basic building structure as found in the dried-in stage of construction including wood in dried contact with foundations, interior and exterior wall sill plates, wood studs, wood or cellulosic sheathing, floor joists and sub flooring, (not to be used in ground contact applications, landscape timbers, docks, boardwalks, decking and deck furniture or other dimensional lumber) wallboard, concrete and masonry (cinder) block building materials to inhibit and prevent the growth of mold and fungi organisms when the materials are subject to moist or wet environments.

CONCRETE / PRODUCTS

DURABAN-I when used as a concrete additive is added directly during concrete preparation. Use 16 fluid ounces of DURABAN-I per cubic yard (approximately 0.2% active by weight of water) of concrete. Add to water before addition of concrete. Addition of DURABAN-I reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion. DURABAN-I can be used as a concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures. **Do not use in treatment of storm drains.**

METAL PRODUCTS

Dilute 16 ounces of DURABAN-I per gallon of water (.625% active); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. DURABAN-I treats approximately 200 square feet per diluted gallon of water. Not for treatment of in place heating, ventilation, air conditioning, and refrigeration systems surfaces such as louvers, vents and ducts.

PREVENTATIVE TREATMENT

To inhibit surface mold and mildew growth on wood, wallboard, concrete and masonry (cinder) block construction materials. Mix DURABAN-I into water at the rate of 2 gallons (21 lb) per 100 gallons of water and apply evenly by paintbrush, airless sprayer, low pressure hand wand or backpack sprayer. Assure uniform coverage of surfaces to be protected (approximately 500 sf per gallon). Surfaces should be evenly wet without runoff or pooling. Let surfaces dry thoroughly before applying additional painting or affixing overlayment materials such as siding, wallboard or flooring.

For Dipping/Soaking/ Padding Applications: Dilute the appropriate amount of DURABAN-I (to ratio specified for the substrate being treated) into water and mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

For Spray Application: Dilute the appropriate amount of DURABAN-I (to ratio specified for the substrate being treated) into water and mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. DURABAN-I treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more DURABAN-I may be required due to absorption. Dry articles in accordance with standard manufacturing drying procedures. A fan may be used to assist in drying carpeting. The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), or industry standards for drying.

ROOFING MATERIALS – Shingles, roofing granules, tiles, membranes, underlayment, wood shakes, felt, stone, concrete, synthetic overcoats.

DURABAN-I may be used in materials that are incorporated into manufactured products at the point of manufacturing. The final article may contain from 0.1% to 1.0% by weight active ingredient. Contact DuraBan International, Inc. to determine the specific rates within this range for individual finished products.

WALLS AND FLOORING – Vinyl, wood, laminate, concrete, tile, stone, wallboard, plaster, dryvit, concrete, cinder block, brick, wall paper, wall coverings, carpet, underlayment, mats.

DURABAN-I may be used in materials that are incorporated into manufactured products at the point of manufacturing. The final article may contain from 0.1% to 1.0% by weight active ingredient. Contact DuraBan International, Inc. to determine the specific rates within this range for individual finished products.

For Dipping/Soaking/ Padding Applications: Dilute 8 ounces of DURABAN-I per gallon of water (2 oz. per quart; 1 oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

For Spray Application: Dilute 8 ounces of DURABAN-I per gallon of water (2 oz. per quart; 1 oz. per pint); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. DURABAN-I treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more DURABAN-I may be required due to absorption. Dry articles in accordance with standard manufacturing drying procedures. A fan may be used to assist in drying carpeting. The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), or industry standards for drying.

FIBERS AND FABRICS (NATURAL AND SYNTHETIC, WOVEN AND NON-WOVEN), ACETATES, ACRYLICS, COTTON, NYLON, LYCRA, POLYESTER, POLYETHYLENE, POLYOLEFIN'S, POLYPROPYLENE, RAYON, SPANDEX, VINYL, WOOL, ORLON, SILK, AND BLENDS OF THESE FABRICS AND NATURAL DOWN – Apparel including recreational gear, sportswear, sleepwear, socks, hosiery, undergarments, gloves, uniforms, footwear (boots, shoes and components), shoe insoles, athletic and casual shoes. Outerwear including jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos. Upholstery including curtains, drapery, mats, throw rugs, furniture, vinyl, toweling, awning, tents, tarpaulin, sails, rope and other outdoor equipment, umbrellas, bedspreads, blankets, sheets, pillow covers, quilts, pillows, mattress pad, ticking, filling, sleeping bags, back packs and luggage.

DURABAN-I may be used in materials that are incorporated into manufactured products at the point of manufacturing. The final article may contain from 0.1% to 1.0% by weight active ingredient. Contact DuraBan International, Inc. to determine the specific rates within this range for individual finished products

DuraBan-I is approved for use in formulation microbiostats for use in laundry additives, carpet treatment products and upholstery and drapery treatment products.

For Dipping/Soaking/ Padding Applications: Dilute 8 ounces of DURABAN-I per gallon of water (2 oz. per quart; 1 oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do Not reuse solution after dipping/soaking.

For Spray Application: Dilute 8 ounces of DURABAN-I per gallon of water (2 oz. per quart; 1 oz. per pint); mix well. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. DURABAN-I

treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more DURABAN-I may be required due to absorption. Dry articles in accordance with standard manufacturing drying procedures. A fan may be used to assist in drying carpeting. The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), or industry standards for drying.

PAINTS AND COATINGS - DURABAN-I is for use in paints and coatings as an in can preservative for protection of paint film and coating film. Types of paints and coatings include : latex indoor/outdoor paints and stains, wood stains, architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline , amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;

DURABAN-I may be used in materials that are incorporated into manufactured products at the point of manufacturing. The final article may contain from 0.1% to 1.0% by weight active ingredient. Contact DuraBan International Inc. to determine the specific rates within this range for individual finished products.

IN CAN PRESERVATION USE

Incorporate this product into coating that are intended for end use applications. The purpose of the coating is to seal the end product from moisture and corrosion. The purpose of DURABAN-I in the coating as an in can preservative is to inhibit the growth of mold, mildew, fungus and bacteria that cause odor, discoloration, staining, deterioration or corrosion on the surface of the coating film. The product protects the applied coating itself from microorganism attack, not the underlying substrate. This product is not intended for remediation, prevention or control of existing or anticipated public health related microorganisms.

PAINTS AND COATINGS

Disperse 100.9 lb to 151.35 pounds (100.9 lb = 100.9lb / 1,009 x 5% active of DURABAN-I) of DURABAN-I per 100 gallons (1,009 lbs + 100 gallons, Specific Gravity = 1.2). Use the high rate in areas favorable to mildew and mold growth, such as where painted surfaces frequently are warm and moist. DURABAN-I, Disperse 151.35 lbs (151.35 lb = 151.35 lbs / 1,009 lb x 5% active of DURABAN-I = .75% active) of DuraLast per 100 gallons (1,009 lbs = 100 gallons, Specific Gravity = 1.2) for exterior wood. DURABAN-I can be used with either unmodified or alkyd modified acrylic, vinyl acrylic or polyvinyl acetate latexes. DURABAN-I can be added into the paint formula during the pigment grind operation, during or after letdown.

AQUEOUS ADHESIVES COATINGS

DURABAN-I may be incorporated into adhesives to protect the applied adhesive films from mold growth and decomposition. Fully disperse 100 pounds to 150 pounds (100 lb = 100 lb / 1,000 lb x 5% active of DURABAN-I = 0.5% active) of DURABAN-I per 1,000 pounds of adhesive while it is being manufactured. Use the high rate in areas favorable to mold and mildew growth, such as where surfaces frequently are warm and moist. **DO NOT** use in adhesives designed for application on food-contact surfaces, or on the interior of buildings engaged in food processing or food handling.

AQUEOUS CAULKS AND SEALANT COATINGS

To provide mold and mildew control on caulking or sealing deposits after application, fully disperse 100 pounds to 150 pounds (100 lb = 100 lb / 1,000 lb x 5% active of DURABAN-I = 0.5% active) of DURABAN-I per 1,000 pounds of caulk or sealant products while they are being manufactured. The high rate is recommended for exterior caulks. **DO NOT** use in caulks or sealants designed for applications on food-contact surfaces. **DO NOT** use in paints designed for applications on food-contact surfaces.

DURABAN-I may be used in materials that are incorporated into manufactured products at the point of manufacturing. The final article may contain from 0.1% to 1.0% by weight active ingredient. Contact DuraBan International, Inc. to determine the specific rates within this range for individual finished products.

For Dipping/Soaking/ Padding Applications: Dilute 8 ounces of DURABAN-I per gallon of water (2 oz. per quart; 1 oz. per pint); mix well. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking/padding.

MISCELLANEOUS – Polyurethane and cellulose foam for household, industrial and institutional sponges and mops, polyurethane and polyethylene foam, when covered, polyurethane foam for packaging and cushioning in non-food contact applications, polyurethane foam used as a growth medium for non-food crops and plants, pre-moistened towelettes and tissue wipes (these do not impart pesticide properties), vacuum cleaner bags and filters, sponges and mops, disposable polyurethane foam cushions for Lipdus Airfloat Systems, non-woven disposable diapers, foam for packaging and cushioning in non-food contact applications, conveyor and humidifier belts, buffer pads (abrasive and polishing), bathroom and non-food contact kitchen hardware, air filters to be installed in furnaces, air conditioners, air purification devices, automobiles, and recirculating air handling systems. Disposable wiping cloths and sponges that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops (these do not impart pesticidal properties).

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EPA REGISTRATION REQUIREMENTS:

The applications for which this product is used may require approval by the Environmental Protection Agency on an end-use basis in regard to claims made thereof. Formulators are responsible for satisfying registration requirements for their products.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal

Metal Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

Plastic Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Glass Containers: Triple rinse (or equivalent). Then dispose of in a sanitary landfill, or by other approved state and local procedures.

Return 275 gallon portable totes to dealers or distributor for refilling. When empty, 5500 gallon tankers must be thoroughly cleaned of pesticide residues prior to tanker use for hauling any other chemicals.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING: DuraBan International Inc. 230 Capital Drive, Suite 300, Buffalo, Minnesota 55313 or obtain from our web site www.durabanintl.com.

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

DuraBan International Inc., warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this label when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

DURABAN INTERNATIONAL INC SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.