

85348-1

3/18/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA Reg.

Number:

85348-1

Date of

Issuance:

MAR 18 2009

Term of Issuance:

Conditional

Name of Pesticide Product:

VSC 7200

NOTICE OF PESTICIDE:

[x] Registration
Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Vitec Global Limited
Queens House 1 Leicester Place
London, WC2H 7BP
United Kingdom

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(a) provided that you:

- 1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
2. Make the labeling changes listed below before you release the product for shipment:
a. Revise the EPA Registration Number to read, "EPA Reg. No. 85348-1".

Signature of Approving Official:

Verma Noble
Product Manager Team-31

Date:

MAR 18 2009

Regulatory Management Branch I

CONCURRENCES

Table with columns for SYMBOL, SURNAME, DATE and rows for Antimicrobials Division (7510P), EPA Form 8570-6, 7510P, 3/16/09, J. Fent

Page 2
 EPA Reg. No. 85348-1

- b. Revise the Precautionary Statements to include the appropriate statements for Primary Eye Irritation. Immediately following the "May be harmful if swallowed or absorbed through the skin." place: "Do not get in eyes or on clothing." In addition, revise to state: "Avoid contact with skin." deleting the references to eyes and clothing from this statement.
- c. Revise the Environmental Hazards statement to include mandatory language as per PR Notice 2000-5 as follows: "Every effort *must* be made to contain..." and "...rags and absorbent material *must* be disposed..."
- d. Revise the Physical or Chemical Hazard statement to include mandatory language as per PR Notice 2000-5 as follows: "...Appropriate measures *must* be taken to prevent..."
- e. Revise the Approved Uses on page three as per PR Notice 2000-5 as follows: "VSC 7200 *is* for incorporation or treatment..."
- f. The Agency requires that all manufacturing-use products made by an integrated formulation system comply with OPPTS 830.1900 Submittal of Samples. Required samples should be sent to the EPA Analytical Laboratory in Beltsville, MD.
- g. Revise page four to read as follows: "Fiberglass ductboard for air handling systems *at the point of manufacture.*" as per the me-too product 82077-1.
- h. Revise page four to read as follows: "Metals: chrome, stainless steel and aluminum."
- i. Revise the heading on page five to read as follows: "Paints and Coatings (In-can preservative)." This product is not approved for application to painted surfaces. Also revise the section that follows by correcting "extension coatings" to read "*extrusion coatings.*"
- j. Revise page four to read as follows: "Air filters for: furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems" so that this statement makes clear that the product is for use to treat air filters in these systems.
- k. Make the following corrections to page seven to bring this language into agreement with PR Notice 2000-5: "VSC 7200 *is to* be incorporated or applied to organic and inorganic surfaces *specified on this label as a dilute...*" "Aqueous solutions *are* prepared by simply..." and "*Treat surfaces* with the aqueous solution by brushing, dipping..."

CONCURRENCES

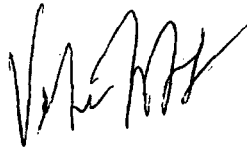
SYMBOL								
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- i. Delete the following two statements from page seven as these are inappropriate for this product: "If desired, reapply VSC 7200 if odor, staining and discoloration due to bacteria, mold or mildew occur. Before applying VSC 7200, visible mold growth must be removed and conditions favorable to mold growth must be identified and corrected." Your product is intended to be used at the point of manufacturer. Materials at the point of manufacture would be free of mold, are to be treated once and subsequently shipped. These materials would also not be stored at the point of manufacture in such a way that mold growth would occur.
- m. Revise the Container Disposal statement as follows: begin with the heading "Container Disposal", delete the statement "Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal." Replace with: "Dispose of rinsate." The rinsate from your product could not be used later as the dilution/application rate of the rinsate would not be known.
- n. Revise the "Warranty and Disclaimer" section such that it refers to the label not the bulletin, as you have only supplied a label for this product. Revise to state: "...for the purposes stated in this *label* when used in..." and "...to the use of this product contrary to the *label* instructions."

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Submit one (1) copy of your final printed labeling prior to release of this product for shipment. If you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
Product Manager 31
Regulatory Branch I
Antimicrobials Division (7510P)

Enclosure: (Stamped Label) D358764, D358762
7510P:T. Lantz:3/16/09:85348-R

CONCURRENCES

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VSC 7200

A Silicone Quaternary Ammonium Salt for Non-Food Contact Applications

FOR MANUFACTURING USE ONLY

Active Ingredient:	3-(trimethoxysilyl) propyldimethyloctadecyl ammonium chloride	72.0%
Other Ingredients:	28.0%
TOTAL INGREDIENTS:	100.0%

CONTAINS OVER 12% METHANOL

KEEP OUT OF REACH OF CHILDREN

DANGER! ☠ POISON

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.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

For information on this product, call (404) 488-8797.

EPA Reg. No. 85348-R

EPA EST. 073089-GA-0012

NET CONTENTS:

VSC7200 10282008

ACCEPTED
with COMMENTS
in EPA Letter Dated:

Lot No. MAR 18 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85348-1

Vitec Global Limited
Queens House, 4th Floor
1 Leicester Place
London, WC2H 7BP
United Kingdom

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER! CORROSIVE. Methanol may cause blindness. Causes irreversible eye damage. Harmful if inhaled. Causes skin irritation. May be harmful if swallowed or absorbed through the skin. Avoid breathing vapors or spray mist. Avoid contact with ~~eyes,~~ skin, ~~and clothing.~~ Wear protective eyewear (goggles or face shield), protective clothing, rubber gloves, and respirator. Use with proper ventilation. Wear a NIOSH approved respirator with any N, R, P or HE filter. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. 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 product to the immediate area. Protect floor drains with absorbent material or barrier material to contain accidental spills. Use sandbags or barrier material to confine the spill, and rags or other absorbent materials by wiping, soaking and/or mopping and allowing the liquid to absorb onto the material. Contaminated sands or barrier material, rags or absorbent material ~~may~~ be disposed of by incineration or burial in an approval landfill. De-activation required during clean up if a spill occurs, by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of VSC 7200 in solution.

PHYSICAL OR CHEMICAL HAZARDS

Undiluted VSC 7200 contains over 12 percent methanol. Avoid breathing vapors. Methanol is released during mixing, application and drying. If desired, methanol removal may be accelerated by heating dilute solution before treatment of substrate. Appropriate measures ~~should~~ be taken to prevent the accumulation of hazardous concentrations of methanol vapors in the work area.

Flammable. Keep away from heat and open flame.

PRODUCT FEATURES AND BENEFITS

VSC 7200 is a microbiostatic agent that inhibits the growth of odor-causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae. This product does not protect users or others against food-borne or disease-causing bacteria or fungi.

VSC 7200 imparts durable biostatic activity to the surface of a wide variety of substrates, and is effective against mold, mildew and algae as a static agent. Through proper application, durable bacteriostatic, fungistatic and algistatic surfaces can be attained with a minimum amount of VSC 7200 for increased efficiency. VSC 7200 provides freshness and combats deterioration and discoloration caused by bacteria, fungi and algae.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

FOR MANUFACTURING 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.

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

APPROVED USES: VSC 7200 ~~may be used~~ for incorporation or treatment of the following substrates to impart bacteriostatic/fungistatic activity:

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BUILDING MATERIALS AND COMPONENTS

- Brick
- Building materials and component-siding, insulation and non-food contact cabinetry, wall board, wood and wood components: interior structural wood as defined as only wood needed for basic building structures as found in the dried-in stage of construction, 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 association with in-ground contact applications, landscape timbers, docks, boardwalks, decking, and deck furniture or other dimensional lumber.
- Ceiling tiles
- Ceramic, ceramic tiles, porcelain, stone and marble
- Cinder block
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; (not to be used in treatment of storm drains)
- Concrete additive for sewer pipes, manholes and concrete sewer structures; (not to be used in treatment of storm drains)
- Concrete products
- Fiberglass duct board for air handling systems
- Floor covering and flooring
- Formica
- Glass- formed and sheet
- Metals, ~~including~~ chrome, stainless steel and aluminum
- Plastics
- Plumbing supplies and fixtures
- Roofing materials (tiles, shakes, shingles, granules, stone, membranes, felt, underlayment and synthetic overcoats)
- Siding
- Wall covering fabrics and wallpaper (including vinyl) for non-food contact surfaces

PAINTS AND COATINGS (In-can preservative ~~on~~ ~~Application to painted surfaces only~~)

- 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: alkyd, urethane, enamel, epoxy, siloxane, amino resins, textile coatings, ~~extension~~ 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. (Any claims for paint use must be for preservation of the paint in the can.)

TEXTILES

- Apparel including outerwear, sportswear and sleepwear
- Awnings
- Bed sheets, pillow covers, blankets, quilts and bedspreads
- Carpet and carpet underlay, mats and throw rugs
- Curtains and draperies
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fibers, fabrics (natural and synthetic, woven and non-woven) leather (natural and synthetic)
- Fire hose material
- Athletic and casual shoes, shoe insoles
- Gloves
- Women's hosiery and intimate apparel
- Mattress pads, filling and ticking
- Non-woven disposable diapers
- Recreational gear
- Sandbags, tents, tarpaulins, sails, ropes and other outdoor equipment
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/lycra, acrylic/polypropylene/nylon/lycra, wool/silk/nylon/lycra and wool/acrylic/nylon/lycra
- Sports equipment and athletic gear
- Toilet tank and seat covers
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Men's underwear and outerwear
- Uniforms
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool

CONSUMER GOODS / LEISURE/HOSPITALITY / INSTITUTIONAL

- Air filter/materials, aquarium filter materials
- Air filters for furnaces: air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Automotive and vehicular parts
- Hardware for kitchen and bathrooms (non-food contact)
- Book covers and pictures
- Buffer pads (abrasive and polishing)
- Cabinetry (non-food contact)
- Disposable foam cushion for Lapidus Airfloat Systems
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, countertops: the wiping cloths do not impart pesticide properties
- For use in formulating products used in residential kitchens and bathrooms on the following hard, non-porous surfaces to impart bacteriostatic/fungistatic activity: Tubs, glazed tile, vanity tops, shower curtains, shower stalls, sinks, washable walls, floors, window

sills, cabinets, exterior of refrigerators, exterior surfaces of appliances and garbage cans

- Furniture
- General purpose (non-food contact) containers
- Non-food contact conveyor and humidifier belts
- Non-food contact counter tops
- Polyurethane and cellulose foam for household, industrial, and institutional mops
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane and polyethylene foam when covered
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelette and tissue wipe) these do not impart pesticidal properties)
- Umbrellas
- Vacuum cleaner bags and filters

MSDS INFORMATION: BEFORE HANDLING, READ PRODUCT AND MATERIAL SAFETY DATA SHEETS AND CONTAINER LABELS FOR SAFE USE, PHYSICAL AND HEALTH HAZARD INFORMATION. THE MATERIAL SAFETY DATA SHEET CAN BE OBTAINED BY WRITING TO VITEC GLOBAL LIMITED.

VSC 7200 ~~can~~ be incorporated or applied to organic and inorganic surfaces as a dilute aqueous solution to give 0.1 to 1.0 percent by weight of active ingredients. Aqueous solutions ~~can be~~ prepared by simply adding the antimicrobial agent to water with stirring. NOTICE: Poor agitation when adding this silane to water can result in locally high concentrations, which may form gel particles.

For handling 72% concentrate prior to use, a coliwasa sampler may be used to check the drum to determine if the material has become thixotropic or paste-like on the bottom of the drum. If the product has become thixotropic or paste-like on the bottom, then heat to 37 degrees Celsius until completely reliquified before using.

Incorporate VSC 7200 directly into formulations used to make end-use products, or dilute with water or with organic solvents such as alcohols, ketones, esters, hydrocarbons and chlorinated hydrocarbons and then apply it to the surfaces identified on this label to give 0.1 to 1.0 percent by weight of active ingredient. Make an initial 1:10 dilution, then a 1:10 dilution into the incorporated material will provide a 0.72% active by weight.

~~Surfaces can be treated~~ with the aqueous solution by brushing, dipping, padding, soaking, or spraying until wet, or applying by foaming techniques. After applying treatment, the surface should be allowed to dry at temperatures from ambient to a maximum of 160°C (320°F) to effect complete curing of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Curing of polymer may be accelerated or enhanced with heat or catalysis. For each application, determine optimum application and drying conditions, such as time and temperature before use. ~~If desired, reapply VSC 7200 if odor, staining and discoloration due to bacteria, mold or mildew occur. Before applying VSC 7200, visible mold growth must be removed and conditions favorable to mold growth must be identified and corrected.~~

STORAGE AND DISPOSAL

Batch Code: _____

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: Pesticide wastes are acutely hazardous. 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.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Do not cut or weld containers. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. ~~Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal.~~ Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedure approved by state and local authorities. This container will have vapor and/or product residues when emptied. All hazard precautions on label must be observed when handling emptied container.

WARRANTY AND DISCLAIMER INFORMATION

Vitec Specialty Chemicals Inc., warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this ~~bulletin~~ 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 ~~bulletin~~ instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

Vitec Specialty Chemicals SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.