

Biodac® is a registered trademark of Kadant GranTek, Inc. and is the name applied to a series of granular products made from deinked or recycled paper fibers.

In August of 1989, the US Environmental Protection Agency (EPA) granted Edward Lowe's Industries, Inc. (now Kadant GranTek, Inc.) an Exemption from the Requirement of a Tolerance for Paper Fiber, deinked or recycled. (Federal Register Volume 54, # 146, Tuesday, August 1, 1989, pages 31674-31675.)

This unique starting material is used in the patented process employed at the Kadant GranTek facility in Green Bay, WI; a granulation process that only applies water and heat to the de-inked or recycled paper fiber. (<http://www.biodac.net>)

The exemption, paper fiber, deinked or recycled, conforming to 21CFR 109.30(a) (9) and 21 CFR 176.260, was granted under 40 CFR 180.1001(d) for use on growing crops only.

Later, when the EPA decided to classify inert ingredients by assigning them to a List, the deinked or recycled paper fiber was placed on List 4A, Minimal Risk Inert Ingredients. (http://www.epa.gov/opprd001/inerts/inerts_list4Acas.pdf (Note: The EPA did not assign any CAS # for paper fiber, deinked or recycled)

In 1996, with the passage of the Food Quality Protection Act (FQPA), the EPA reviewed the exemptions it had previously granted to inert ingredients.

In 2003 the EPA reconfirmed this exemption from the requirements of a tolerance; Federal Register of April 16, 2003, volume 68, # 73, pages 18550- 18553. The citation stated: "The following tolerance exemptions are shifted from 40 CFR 180.1001(d): paper fiber, deinked or recycled."

The components of Biodac were transferred to 40 CFR 180.950; Tolerance Exemptions for Minimal Risk Active and Inert Ingredients. Again, the EPA did not assign any CAS # to the Biodac product, but this new listing eliminated the old restriction of use on growing crops, only, and it was expanded to include non-crop granular products.

The citation can be found at: http://www.ecfr.gov/cgi-bin/text-idx?SID=f60c9f75e1950a793d381906afc1743b&node=se40.24.180_1950&rgn=div8

The 40 CFR 180.950 reads in part:

Maltodextrin	9050-36-6
Paper	None
Potassium chloride	7447-40-7
Silica, amorphous, fumed	

In 2013, in order to help its reviewers determine the status of inert ingredients identified on CSF's submitted to the Agency, the EPA created a Trade Name database.

<http://iaspub.epa.gov/apex/pesticides/f?p=inertfinder:mixtures>

The complete Biodac series is listed in this EPA Trade Name database.

If one types the word Biodac into the search box for the link above, the following results are obtained:

	<u>Manufacturer</u> 	<u>Inert Mixture Name</u>	<u>910</u>	<u>920</u>	<u>930</u>	<u>940</u>	<u>950</u>
	Kadant GranTek Inc.	Biodac 10/30	-	-	-	-	Yes
	Kadant GranTek Inc.	Biodac 12/20	-	-	-	-	Yes
	Kadant GranTek Inc.	Biodac 20/50	-	-	-	-	Yes
	Kadant GranTek Inc.	Biodac 30/60	-	-	-	-	Yes
	Kadant GranTek Inc.	Biodac 4/10	-	-	-	-	Yes
	Kadant GranTek Inc.	Biodac 8/16	-	-	-	-	Yes

Therefore, when submitting a new Confidential Statement of Formulation (CSF) (EPA form 8570-4) or applying for changes to an existing CSF for crop or non-crop products, one only needs to enter the word Biodac and the granule size(s) (for example Biodac 4/10) in box # 10 on the CSF (as shown above) the descriptor for the granular portion of the new or modified product.

No CAS #'s or other information is required for adding or listing Biodac in an EPA registration.