

EFFICACY REVIEW

DATE: IN 11/27/85 OUT 12/10/85

FILE OR REG. NO. 34292-1 and 34292-2

PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED 10/15/85

DATE OF SUBMISSION 9/30/85

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCT(S): I, D, H, (F,) N, R, S _____

DATA ACCESSION NO(S). _____

PRODUCT MGR. NO. 31

PRODUCT NAME(S) Dow Corning 5700 Anti Microbial Agent and

Dow Corning 5772 Anti Microbial Agent.

COMPANY NAME Dow Corning Corporation

SUBMISSION PURPOSE add use as laundry additive.

CHEMICAL & FORMULATION 3-(trimethylsilyl)propyl dimethyl-
octadecyl ammonium chloride; 42%
and 72% liquids.

CONCLUSIONS & RECOMMENDATIONS The proposed labeling for
use as a laundry additive must be
clarified. If the product itself is to
be used as a laundry additive, complete
directions for use must be included.

indicate the dosage rate to use per specified quantity of laundry, when to add the product in the wash or rinse cycles and other details such as method of application or addition of the product.

⑥ → If the product is to be formulated into other products (liquid laundry detergent formulations) as indicated in your letter, this^① must be clearly stated.

⑦ Directions for formulating such products must be given and labeling must indicate that such products require EPA Registration.

The currently registered labels and labeling for these products, 5700 and 5772, do not adequately define the intended uses of the products. The statement under "EPA Registration Requirements" (page 2 of "Information about Antimicrobial Agents") is confusing. The intended uses indicated appear to be end uses. If the product is intended for end uses (treating fabric, etc.), the ~~the~~^{treated objects} (such as textiles shoes, etc.) would not require registration if protection is intended for the object itself. If the product is to be formulated ~~to be~~ into other products for use in treating these materials, the label must state this and give directions for formulating rather than end use directions. If both end use and formulating uses are intended, indicate which uses are formulating and which are end uses,

The statement on the label "as a final bacteriostatic, fungistatic, preservative finish" must be expanded to indicate, in general, the types of materials intended to be treated. Specific uses must be listed in the technical bulletin. Such a list is included only for the 5772 formulation. If the same uses are intended, they must be stated in the labeling for 5700. The heading for the left column on the "New Product Information" sheet for 5772 states "Textile Surfaces" but there are many other types of surfaces listed. A more descriptive heading would be appropriate.

The sheet "Information about Antimicrobial Agents" for 5700 does not give a dosage rate. Indicate the same dilution rate for this product as for the 5772 formulation.

C. Grable
TSS, FHB
RD (TS-767C)

E 12/11/75