

Lori S. Lickly  
Registration Specialist  
Regulatory Compliance  
The Dow Chemical Co.  
1803 Building  
Midland, MI 48674-1803

Dear Ms. Lickly:

Subject: Review of Voluntary Deletion of Uses and Labeling  
Dowicide A Antimicrobial  
EPA Reg. No. 464-78  
Your Letter Dated 7/1/93

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment. Enclosed is a stamped copy of the label for your records.

1. Modify the **ENVIRONMENTAL HAZARDS** section to read as follows:

"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 our State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of wastes."

2. Since all postharvest uses in fruits and vegetables (except for pears and citrus fruits), aquatic uses and wood treatment uses have been deleted from your label, modify or delete the references to those uses in the statement concerning the "USDA Compilation of Registered Uses of Fungicides and Nematicide".

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3. Under **INDUSTRIAL APPLICATIONS** the directions for "Metalworking Fluids" must be revised to read as stated in the label stamped "ACCEPTED OCT 26 1983".

Sincerely Yours,

15/

Cynthia Giles-Parker  
Product Manager (22)  
Fungicide-Herbicide Branch  
Registration Division (7505C)

Enclosure

) cc: Kathy Depukat, SRRD  
Kathy Davis, SRRD

CONCURRENCES

SYMBOL	SURNAME	DATE						
15205	12/1/83	12/1/83						

*Jacket*

## DOWICIDE\* A Antimicrobial

For the control of fungi and bacteria in industrial applications, and for postharvest preservation of pears and citrus fruits.

### Active Ingredients:

Sodium orthophenylphenate, tetrahydrate ..... 97%

Inert Ingredients: ..... 3%

E.P.A. Registration No. 464-78

E.P.A. Est. 464-MI-1

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

### PRECAUTIONARY STATEMENTS

**Hazards to Humans and Domestic Animals**

Label Insecticide  
and Fungicide Act  
for the pesticide  
under EPA Reg. No.  
464-78

**CORROSIVE TO SKIN • INJURIOUS TO EYES • IRRITATING DUST • HARMFUL IF SWALLOWED**

**Do Not Get in Eyes on Skin, or on Clothing • Avoid Breathing Dusts • Wear Goggles or Face Shield and Rubber Gloves When Handling • Wash Thoroughly After Handling**

### Statements of Practical Treatment

**In case of eye contact, immediately wash eyes with flowing water for 15 minutes. Call a physician.**

**In case of skin contact, immediately flush skin with plenty of water for at least 15 minutes and get medical attention if irritation persists. Remove contaminated clothing and shoes. Wash clothing before reuse. Destroy contaminated shoes. If swallowed, induce vomiting immediately by giving two glasses of water and sticking finger down throat. Call a physician. Do not induce vomiting or give anything by mouth to an unconscious person.**

**Anyone experiencing noticeable ill effects from breathing the dust of this material should be removed to fresh air.**

### ENVIRONMENTAL HAZARDS

**Do not discharge into lakes, streams, ponds, or public waters unless in accordance with a NPDES permit. For guidance, contact your regional office of the EPA.**

### IN CASE OF AN EMERGENCY

**Endangering life or property involving this product, call collect 517-636-4400**

### NOTICE

**Do Not Ship or Store with Food, Feeds, Drugs, or Clothing**

**BEST AVAILABLE COPY**

**LABEL DRAFT**

**DOWICIDE\* A Antimicrobial**

June 30, 1993

Page 2 of 4

**DIRECTIONS FOR USE**

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

Only for (1) postharvest preservation of pears and citrus fruits or industrial uses as specified on this label; (2) uses for which USEPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration; (3) uses for experimental purposes that are in compliance with USEPA requirements.

If exposed to air for prolonged periods, this material may give a cloudy solution in water. Such cloudiness may be minimized by adding sufficient caustic (sodium hydroxide)

DOWICIDE A Antimicrobial, when used according to good manufacturing practices, meets the requirements of the FDA for use in resinous and polymeric coatings: can end cements [21 CFR 175.300(b)(3)(xxxi)]; adhesives [21 CFR 175.105(c)(5)]; animal glue [21 CFR 178.3120(d)(3)]; zinc-silicon dioxide matrix coatings [21 CFR 175.390(b)(2)]; components of paper and paperboard in contact with aqueous and fatty foods [21 CFR 176.170(b)(2)]; components of paper and paperboard in contact with dry food [21 CFR 176.180(b)(1)]; defoaming agents used in the manufacture of paper and paperboard [21 CFR 176.210(d)(3)]; and closures with sealing gaskets for food containers [21 CFR 177.1210(b)(5)].

DOWICIDE A Antimicrobial also appears in the "List of Chemical Compounds Authorized for Use Under USDA Inspection and Grading Programs" as a sanitizer for all surfaces. After using the product, the treated surfaces must be rinsed thoroughly with potable water before operations are resumed.

**NOTE: PRODUCERS USING THIS PRODUCT TO FORMULATE PESTICIDES ARE RESPONSIBLE FOR OBTAINING EPA REGISTRATION FOR THEIR FORMULATED PRODUCTS.**

**POSTHARVEST PRESERVATION - PEARS AND CITRUS FRUITS**

Tolerances have been established for DOWICIDE A for postharvest application to a various crops [40 CFR 180.129] and it is exempt from the requirements of a tolerance when used at a maximum level of 0.1% for the preservation of pesticide formulations applied to growing crops only [40 CFR 180.1001(d)].

DOWICIDE A Antimicrobial is listed in the "USDA Compilation of Registered Uses of Fungicides and Nematicides" for postharvest application to various crops, and as a preservative for wood containers used for fruits and vegetables.

For postharvest preservation of pears and citrus fruits, use 0.05-3.09% DOWICIDE A by wt in an aqueous solution or in an approved wax emulsion. Apply by spraying, dipping, or flooding.

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**INDUSTRIAL APPLICATIONS**

Application	Purpose	Suggested Concentration of DOWICIDE A	How to Apply
Adhesives	To protect adhesives based on starch, protein, natural and synthetic gums, and natural and synthetic rubber latex from deterioration during manufacture, storage, and service life.	0.05-1.0% by wt of DOWICIDE A.	Add as a concentrated aqueous solution to the formulation.
Ceramic Glazes and Clay Slips	To prevent bacterial decomposition.	0.05-0.19% by wt of formulation.	Add to ingredients of formulation as they are charged into ball mill.
Chemical Toilets	To control odors in chemical toilets on buses, trains, and airplanes.	1.0-1.5 oz per quart of water.	Dissolve antimicrobial in water.
Construction Materials	To control mold growth on inert surfaces such as asbestos shingles, tile roofs, brick walls, and concrete blocks.	1.0% by wt in water.	Rinse previously cleaned surface with solution of antimicrobial.
Fire Extinguisher Solutions	To preserve foam-type solutions.	0.25-0.5% by wt of solution.	Add antimicrobial to solution.
Floor Wax Emulsions	For shelf preservation.	0.1-0.5% by wt of emulsion.	Add to water phase of emulsion during formulating process.
Ink	For shelf preservation of dextrin-based watercolor printing inks.	0.5% by wt of formulation.	Add as a concentrated aqueous solution to the formulation.
Laundry Starch	To preserve liquid starch during shelf and use life.	0.2% by wt of formulation.	Add as a concentrated aqueous solution to the formulation.
Leather	To prevent slippage of hair on furs in soaking liquors; to prevent deterioration of treating and finishing formulations.	One part per 15 parts of water for soaking liquors. 0.05-0.1% by wt for pastes, dressings, and finishes.	Add as a concentrated aqueous solution to the formulation.
Metal working Fluids	To prevent slippage of hair on furs in soaking liquors; to prevent deterioration of treating and finishing formulations.	One part per 15 parts of water for soaking liquors. 0.05-0.1% by wt for pastes, dressings, and finishes.	Add as a concentrated aqueous solution to the formulation.
Paint	For preservation of decomposable raw material solutions or dispersions during storage. For shelf preservation of protein-based latex paints.	Minimum of 0.6% by wt of DOWICIDE A.	Add as a concentrated aqueous solution to the formulation.
Polyvinyl Alcohol	To preserve solutions of the alcohol.	0.6-0.8% by wt of solution.	Add antimicrobial to solution.
Pulp and Paper	To preserve coatings, sizings, and printing colors based on starch, animal and vegetable protein, and latex.	0.1-1.0% by wt of material preserved.	Add as a concentrated aqueous solution.
Textiles	To preserve processing materials and finished yarns and cloth during storage.	0.1-0.75% by wt of materials treated.	Add as a concentrated aqueous solution.

*USE  
 6.0% DOWICIDE A  
 AS A DISINFECTANT  
 & PREVENTION OF DISINFECTION*

**STORAGE AND DISPOSAL**

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

Storage - Keep package tightly closed when not in use.

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.

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LABEL DRAFT  
DOWICIDE\* A Antimicrobial  
June 30, 1993  
Page 4 of 4

**Container Disposal** - Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Notice:** Seller warrants that the product conforms to its chemical description as contained on this label and is reasonably fit for the purposes stated on this label (except uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration) when used in accordance with directions under normal conditions of use. **THE WARRANTIES MADE IN THIS PARAGRAPH ARE SELLER'S SOLE WARRANTIES WITH RESPECT TO THE PRODUCT AND ARE MADE EXPRESSLY IN LIEU OF AND EXCLUDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIONS AND WARRANTIES.**

NET 22.68 kg / 50.00 lb

The Dow Chemical Company  
Midland, MI 48674 U.S.A.

\*Trademark of THE DOW CHEMICAL COMPANY

86-1434

TRANS. DIAMOND: CORROSIVE (WITH NUMBER)

DOT CORROSIVE SOLID, N.O.S. (Contains: Sodium Orthophenylphenate, Tetrahydrate)  
UN1759

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