SEP 1 6 1998

Gregory J. Bradley
The Dow Chemical Company
2030 Dow Center
Midland, Michigan 48674

Dear Mr. Bradley:

Subject:

Addition of Slurry uses

Dowicide A

EPA Registration No. 464-78

Amendment application of August 17, 1998

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amendment, is acceptable provided that you make the labeling change indicated below prior to release for shipment of product bearing the amended labeling.

Revise the statement "unwanted microorganisms" to "fungi and bacteria". The word statement unwanted microorganisms is too broad.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of labeling is enclosed for your records.

Sincerely yours,

Adam Heyward

Product Manager (34)

Regulatory Management Branch II Antimicrobials Division (7510W)

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FINAL DRAFT LABEL
DOWICIDE* A Antimicrobial
August 14, 1998
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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	

KEEP OUT OF REACH OF CHILDREN

ACCEPTED with COMMENTS in EPA Letter Dated:

DANGER

SEP 1 6 1998

PRECAUTIONARY STATEMENTS

Under the Federal Insecticide, Fingicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 464-78

Hazards to Humans and Domestic Animals

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

This pesticide is toxic to fish and aquatic organisms. 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

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guidance contact your State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of wastes.

IN CASE OF AN EMERGENCY

endangering life or property involving this product, call collect 517-636-4400 with COMMENTS in EPA Letter Dated:

NOTICE

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

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide,

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with the labelite interest under EPA Reg. No.

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; or (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

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.

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.

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Construction	To control the growth of fungi	0.025 - 0.4% by wt of formulation	Add at a suitable point during
Material Preservation	and bacteria in building materials such as mastics, caulks, joint cements,		the manufacture. DOWICIDE A may be premixed with water prior to addition to
	spackling, grouting and concrete admixtures.		reduce incorporation time into the formulation.
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.	0.025 - 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.	0.025 - 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.
Metalworking Fluids	To prevent decomposition of oils, emulsifying agents, and other components.	Add DOWICIDE A to yield 0.05 to 0.5% by wt. in diluted metalworking fluid.	Add as a concentrated aqueous solution to the use dilution of the metalworking fluid or to the concentrate prior to dilution.
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.
Slurries	To control the growth of unwanted microorganisms in aqueous based slurries.	Add 0.015 - 0.6% by wt of slurry.	Add as a concentrated aqueous solution at a suitable point during the manufacture, container loading/filling, shipment or storage of the slurry.
Textiles	To preserve processing materials and finished yarns and cloth during storage.	0.1-0.75% by wt of materials treated. ACCEF	Add as a concentrated aqueous solution.
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with COMMENTS in EPA Letter Dated:

STORAGE AND DISPOSAL

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

Storage - Keep package tightly closed when not in use.

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide,

registered under EPA Reg. No. 46 H - 78

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 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.

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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 WT.: 25 kg / 55.12 lb

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

*Trademark of THE DOW CHEMICAL COMPANY

TRANS. DIAMOND: CORROSIVE (WITH NUMBER)

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

ACCEPTED with COMMENTS in EPA Letter Dated:

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