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OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

October 8, 2003

Rhonda Vance-Moeser Senior Regulatory Specialist **The Dow Chemical Company** 1803 Building Midland, MI 48674

Subject:

Dowicide A Antimicrobial

EPA Registration Number 464-78 Application Dated July 8, 2003

Dear Ms. Vance-Moeser:

The following amendments, submitted in connection with registration under section of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with comment:

Proposed Amendments

- Revised Basic and Alternate formulas (See CSFs dated 7/7/03 and 8/5/03)
- Revised Labeling

General Comment

The signal word must be listed in two places on the label. Once in the Keep Out of Reach of Children statement and in the Precautionary subheading.

Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Copies of the CSFs have been inserted in your file for future reference.

Note that the revised basic Confidential Statement of Formula dated July 7, 2003 supersedes all previously accepted ones.

CONCURRENCES							
SYMBOL					***************************************		
SURNAME							
DATE					***************************************	***************	
OFFICIAL FILE COPY							

Other Comments UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Should you have any question concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,

Adam Heyward

Product Manager 34

Regulatory Management Branch II Antimicrobials Division (7510C)

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ATTION THE CODY							

DOWICIDE* A Antimicrobial

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

Active ingredient(s):

Sodium o-phenylphenate	71.7%
Inert Ingredients	.28.3%
Total	.100%

E.P.A. Registration No. 464-78 E.P.A. Est. 464-MI-001(40), 39967-DEU-001(CH) Superscript used corresponds to alpha/numeric

KEEP OUT OF REACH OF CHILDREN

DANGER ----

PRECAUTIONARY STATEMENTS 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 . ush Thoroughly After Handling

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 harge. Do not discharge effluent containing this act 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. Do no contaminate water by cleaning of equipment or disposal of wastes.

NOTICE

Do not Ship or Store with Food, Feeds, Drugs, or Ciothing



NET WT.: 25 kg/55.12 lb

THE DOW CHEMICAL COMPANY

·	FIRST AID					
IF IN EYES	Hold eye open and rinse slowly and gently with water for 30 minutes.					
	 Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. 					
	 Call poison control center or doctor (preferably ophthalmdogist) for treatment advice. 					
IF ON SKIN	Take off contaminated clothing.					
OR CLOTHING	Rinse skin immediately with plenty of water for 30 minutes.					
	Call a poison control center or doctor for treatment advice.					
IF SWALLOWED	 Call poison control center or doctor immediately for treatment advice. 					
	Have person sip a glass of water if able to do so.					
	 Do not induce vorniting unless told to do so by the poison control center or doctor. 					
_	Do not give anything by mouth to an unconscious person.					
IF INHALED	Move person to fresh air.					
	 If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably 					
	mouth-to-mouth if possible.					
	Call a poison control center or doctor for further treatment advice.					
	HOT LINE NUMBER					
IN CASE OF AN EN	MERGENCY endangering life or property involving this product, call collect 989-636-4400. Have the					

product container or label with you when calling a poison control center or doctor or going for treatment.

STORAGE AND DISPOSAL

Do no 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 you Sate 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

Notice: Seller warrants that the product conforms to its chemical description as contained on this tabel 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.

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

DIRECTIONS FOR USE

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

Only (1) postharvest paservation 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 my give a cloudy solution is 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 DFA for us in resinous and polymeric coatings; can end cements (21 CFR 175.300(b)(3)(xxxd)); adhesives (21 CFR 175.105(c)(5)); animal glue (21 CFR 178.3120(d)(3)); zincsilicon dioxide matrix coalings (21 CFR 175.390(b)(2)); components of paper and paperboard in contact with aqueous and fatty toods (21CFR 176.170 (b)(2)); components of paper and paperboard in contact with dry food (21CFR 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.

POSTHARVEST PRESERVATION PEARS AND CITRUS

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 APPLIC	ATTIONS
Application	Purpo
Adhesives	To protect acheeves to protein, reduced and ayou neglect and synthetic in detection during me and service life.
Commit: Glazes and Clay Silps	To prevent bacterial de
Chemical Tollets	To cominci actors in the buses, trains, and sign
Construction Minimise Preservation NOT REGISTERED FOR THIS USE IN CALIFORMIA	To control the growth of in building contents of conding joint company, of and concrete administration
Fire Extinguisher Solutions	To jamen ve kaan type
Floor Wax Emulsions	For shalf preservation.
ink	For shall preservation of watercolor printing into
Polymer Latex Disposions and Emulations NOT REGISTERED FOR THIS USE IN CALIFORNIA	webergolor printing lists. To preserve synthetic a lating in seasofactory of instance ground, stylen ethyluma-drythcostes, v biopoylener basect synthetic.
Laundry Starch	To preserve figure stays uma life.
Conflor	To prevent alippage of southing liquide, to prev- of treating and finishing
Metaheoring Pluids NOT REGISTERED FOR THIS USE IN CALIFORNIA	To prevent decomposition and administration of the control of the
Paint	For preservation of dec material solutions or di- paint manufacturing or preservation of water to
Polyvinyl Alcohol	To preserve solutions o
Pulp and Paer	To preserve coatings, a colors based on starch, vegetable protein, and i
Sturries	To control the growth o
NOT REGISTERED FOR THIS USE IN CALIFORNIA	in aqueous based stuni
Textiles	To preserve processes

ACCEPTED with COMMENTS

defined where they cloth

OCT 8 2003

Under the Federal Inserticide. Fungicide, and Rodenticide Act as amended, for the pesticide. registered under EPA Reg. No. 464