

464-78

8/11/2004

Page 1 of 7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 11, 2004

Elizabeth Anne Brown
ChemReg International LLC
Authorized Agent for
The Dow Chemical Company
1990 Old Bridge Road
Suite 201
Lake Ridge, VA 22192-2383

Subject: DOWICIDE A Antimicrobial
EPA Registration No. 464-78
Application Dates: July 6, 2004
EPA Received Dates: July 6, 2004

Dear Ms. Brown:

The following amendment, submitted under connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable for the following reasons:

Proposed Amendment

- Revised labeling

Label Comments

Revise the label as follows:

1. On Page 1, revise the First Aid Statements to include the following:

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

CONCURRENCES

SYMBOL	751cc						
SURNAME	L. A. Brown						
DATE	8-11-04						

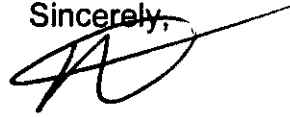
2. On Page 4, revise the "Polymers and plastics" directions by changing the application statement to read "Polymers and plastics: PVC, polyurethane, rubber, acrylic."

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three(3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)

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 o-phenylphenate71.7%

Inert Ingredients:28.3%

Total 100%

E.P.A. Registration No. 464-78
E.P.A. Est. 464-MI-1(4Q), 39967-DEU-001(CH)
Superscript used corresponds to alpha/numeric in lot number.

ACCEPTED
with COMMENTS
EPA Letter Dated:

AUG 11 2004

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
Danger

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

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • 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 ophthalmologist) for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 30 minutes • Call a poison control center or doctor for treatment advice
IF SWALLOWED	<ul style="list-style-type: none"> • 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 vomiting unless told to do so by the poison control center or doctor • Do not give anything by mouth to an unconscious person
IF INHALED	<ul style="list-style-type: none"> • 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	
<p>IN CASE OF AN EMERGENCY, 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.</p>	

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

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.

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

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

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; 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

DOWICIDE A may be used during the production of products for household, institutional and industrial uses.

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 Material Preservation NOT REGISTERED FOR THIS USE IN CALIFORNIA	To control the growth of fungi and bacteria in building materials such as mastics, caulks, joint cements, spackling, grouting and concrete admixtures.	0.025 - 0.4% by wt of formulation	Add at a suitable point during the manufacture. DOWICIDE A may be premixed with water prior to addition to 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.	Add 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.
Polymer Latex Dispersions and Emulsions NOT REGISTERED FOR THIS USE IN CALIFORNIA	To preserve synthetic and natural polymer latices in manufacture and storage; including acrylic, styrene/butadiene, ethylene/vinylacetate, vinyl/acrylic and biopolymer based systems	Add 0.1 - 1.0% by wt of emulsion	Add to the latex or solutions slowly with agitation by premixing into a concentrated aqueous solution.
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.

DOWICIDE* A Antimicrobial
 DRAFT LABEL - 7/6/2004

677

Application	Purpose	Suggested Concentration of DOWICIDE A	How to Apply
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 0.5% to 1.0% by wt for pastes, dressings, and finishes.	Add as a concentrated aqueous solution to the formulation.
Metalworking Fluids NOT REGISTERED FOR THIS USE IN CALIFORNIA	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 paint manufacturing or storage. For shelf preservation of water-based 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 NOT REGISTERED FOR THIS USE IN CALIFORNIA	To control the growth of fungi and bacteria 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.	Add as a concentrated aqueous solution.
Wood and wood products NOT REGISTERED FOR THIS USE IN CALIFORNIA	To protect from mold, mildew, and sapstain	Construction woods: 1-4% by wt of solution Pallets, fruit and vegetable pallets: 1-3% by wt of solution	Apply as an aqueous dip, or spray by preparing an aqueous solution.
Polymers and plastics such as PVC, polyurethane, rubber, acrylic NOT REGISTERED FOR THIS USE IN CALIFORNIA	To protect from deterioration during manufacture, storage, and service life.	0.15-0.7% by wt of material to be protected.	Add at a suitable point during the manufacture.
Biopolymers NOT REGISTERED FOR THIS USE IN CALIFORNIA	To protect from deterioration during manufacture, storage, and service life.	0.15-0.3% by wt of material to be protected	Add at a suitable point during the manufacture.
Photographic solutions NOT REGISTERED FOR THIS USE IN CALIFORNIA	To protect from deterioration during manufacture, storage, and service life.	0.1-0.4% by wt of material to be protected	Add at a suitable point during the manufacture.

Application	Purpose	Suggested Concentration of DOWICIDE A	How to Apply
Dyes, Tints, Pigments and Filler Suspensions NOT REGISTERED FOR THIS USE IN CALIFORNIA	To protect from deterioration during manufacture, storage, and service life.	0.07-0.3% by wt of materials treated	Add at a suitable point during the manufacture.
Cleaning Solutions NOT REGISTERED FOR THIS USE IN CALIFORNIA	To protect from deterioration during manufacture, storage, and service life.	0.1-0.6% by wt of solution	Add at a suitable point during the manufacture
Wax Emulsions and Polishes NOT REGISTERED FOR THIS USE IN CALIFORNIA	To protect from deterioration during manufacture, storage, and service life.	0.1-0.6% by wt of emulsion	Add at a suitable point during the manufacture

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

Dow Diamond
The Dow Chemical Company
Midland, Michigan
48674 USA
1-800-258-CHEM
*Trademark of The Dow Chemical Company