



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 7, 2006

Rhonda Vance-Moesar
Senior Regulatory Specialist
The Dow Chemical
1803 Building
Midland, MI 48674

Subject: Notification in Accordance with PR Notice 98-10
Dowicil™ 150 Antimicrobial
EPA Registration Number 464-327
Application: November 13, 2006
Receipt Date: November 15, 2006

Dear Ms. Vance-Moesar:

This will acknowledge receipt of your notification, submitted under the provisions of PR Notice 98-10, FIFRA section 3 (c) 9.

Proposed Notification:

- Add the qualifier "Produced For" to the label when product produced by contract manufacturer
- Revise trademark statement


General Comment:

Based on a review of the material submitted, the following comment apply.

The notification application is acceptable. A copy has been inserted in the file for future reference.

Should you have any questions or comments concerning this letter, please contact me by telephone at (703) 308-6422 or email address at: heyward.adam@epa.gov, or Renae Whitaker telephone at (703) 308-7003 or email address at: whitaker.renae@epa.gov.

Sincerely,


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

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 464-327	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow Chemical / DOWICIL (TM) 150 Antimicrobial	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) The Dow Chemical Company 1803 Building Midland, MI 48674 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to 1) add the qualifier "Produced For" to the label when product produced by contract manufacturer
 2) revise trademark statement
 Mandatory notification statement is contained in cover letter accompanying this notification submission.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Text <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input checked="" type="checkbox"/> Other (Specify) <u>Fiber drum</u>	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 & 25 lb/2 oz		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Rhonda Vance-Moeser	Title Senior Regulatory Specialist	Telephone No. (Include Area Code) 989-636-1884
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		E. Date Application Received (Stamped)
2. Signature <i>Rhonda Vance-Moeser</i>		
3. Title Senior Regulatory Specialist		
4. Typed Name Rhonda Vance-Moeser		5. Date 11/13/06

DOWICIL™ 150 ANTIMICROBIAL

For The Control of Bacteria and Fungi in Industrial Applications

For Industrial Use Only

Active Ingredient(s):
 Cis-Isomer of 1-(2-chloroethyl)-3,5,7-triazabicyclo[2.2.1]heptane 96%
 Inert Ingredient(s): 4%
TOTAL 100%
 E.P.A. Registration No. 464-927
 E.P.A. Est.

KEEP OUT OF REACH OF CHILDREN

WARNING

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNINGS: Maybe fatal if absorbed through skin. Harmful if swallowed. Causes moderate eye irritation. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Handlers must wear: chemical-resistant gloves (such as Nitrile, butyl, Neoprene, and/or Barrier-4 laminate).

Physical or Chemical Hazards

FLAMMABLE - Keep Away From Heat, Sparks, and Open Flame

FIRST AID	
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 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 swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.
IF IN EYES	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a Poison Control Center or doctor for treatment advice.
HOT LINE NUMBER	
IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect 800-636-6488. Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
NOTE TO PHYSICIAN	Probable mucosal damage may contraindicate the use of gastric lavage.

Environmental Hazards

This pesticide is toxic to fish and invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, canals 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.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE water, food, or feed by storage or disposal. Storage: store in a dry place. Store below 60°C. Keep container tightly closed when not in use.

Pesticide Disposal - Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixtures, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by a means according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative of the nearest EPA Regional Office for guidance.

Container Disposal - Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residues into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. Dispose of drum in the same manner.



NOTICE

Do Not Mix 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 its labeling.

DOWICIL 150 Antimicrobial, when used according to good manufacturing practices, meets the requirements of Food Additive Regulations 21 CFR 175.105 for use as a preservative in adhesives; 21 CFR 175.106 for preservation of polyethylene waxes in contact with dry bulk foods; 21 CFR 175.170 for preservation of components of paper and paperboard intended for use in contact with aqueous and fatty foods; and 21 CFR 175.180 for preservation of components of paper and paperboard intended for use in contact with dry foods.

DOWICIL 150 may be used as a preservative (see ingredients) in water-based formulations which do not come in contact with food, food crops, feedstuffs, and water supplies, and which are not applied to humans or food producing animals, in concentrations not to exceed 0.14% by wt of the total formulation.

DETERMINANTS

To prevent bacterial deterioration during storage and to increase the shelf life of biodegradable surfactants, add 0.05-0.15% DOWICIL 150 Antimicrobial by wt of the formulation. Add as an aqueous solution.

FLAME TREATING (Flame Retardant) POLYMER FILMS

To preserve water-based systems and finishes during storage, add 0.05-0.15% DOWICIL 150 Antimicrobial by wt of the formulation. Add as an aqueous solution.

ADHESIVES

To prevent pH drops, splits, gas formation, change in viscosity, and loss of adhesive strength during manufacture, storage, and service, add 0.05-0.5% DOWICIL 150 Antimicrobial by wt to the formulation. Add as a concentrated aqueous solution.

For use in the following types of adhesives:

Starch Based (corn, tapioca, sago, potato, etc.)
 Add 0.1-0.2% DOWICIL 150 by wt as a concentrated aqueous solution.
 Protein-Based (animal skins such as fish, bone, fish, blood, and gelatin)

Add 0.1-0.2% DOWICIL 150 by wt as a concentrated aqueous solution.
 Natural Resins (beeswax, gum, and rosin)

Add 0.05-0.2% DOWICIL 150 by wt as a concentrated aqueous solution. Highly concentrated gums do not readily accept bacterial or fungal growth; consequently, higher concentrations of DOWICIL 150 are required in the less concentrated gum solutions.

Refract Index Lenses

Add 0.05-0.15% DOWICIL 150 by wt as a concentrated aqueous solution.

Painting Resin Emulsions

Add 0.05-0.15% DOWICIL 150 by wt as a concentrated aqueous solution.

Synthetic Resins (e.g., METHACEL* methylmethacrylate resins) and other Synthetic-Based Adhesives

Add 0.05-0.15% DOWICIL 150 by wt as a concentrated aqueous solution.

Synthetic adhesive formulations sometimes incorporate natural substances such as starches or proteinaceous materials. To preserve these formulations, use the level of antimicrobial recommended for the adhesives containing only the natural material.

LAKEBERRY STARCH

To increase shelf and wet life of liquid formulations, add 0.05-0.15% DOWICIL 150 Antimicrobial by wt of the formulation. Add as an aqueous solution.

CONSTRUCTIVE MATERIALS

To increase shelf and wet life of caulking, grouting, and spackling compounds, and joint compounds, add 0.05-0.15% DOWICIL 150 Antimicrobial by wt of the formulation. Method of application depends on the type of formulation, and may be made dry or as a concentrated aqueous solution.

NOTE: DOWICIL 150 IS INCOMPATIBLE WITH CASEIN IN BOTH LIQUID AND DRY SYSTEMS, AND WITH SOME TYPES OF ANILINE-DISPERSED CLAYS.

INKS

To increase the shelf life of fountain pens, fabric, and paper printing inks, add 0.15-0.2% DOWICIL 150 Antimicrobial by wt of the ink. Add as an aqueous solution.

LATEX EMULSIONS

To prevent bacterial deterioration during manufacture, storage, and use of latex emulsions, add 0.05-0.15% DOWICIL 150 Antimicrobial by wt of the total emulsion. Add as an aqueous solution.

NEURALGIC FORMULATIONS

To control bacterial contamination that produces odors, rancidity, acidity, and destruction of soluble coating oils, add 0.1-0.2% DOWICIL 150 Antimicrobial by wt of the formulation. Add to the water phase of the coating field during formulation.

PAINTS

To preserve cellulose-dibutylacrylate latex paints in the can, add 0.05-0.2% DOWICIL 150 Antimicrobial by wt of the formulation. Add dry or as an aqueous solution during any phase of the formulating process in the aqueous phase raw materials. DOWICIL 150 has no effect on the viscosity, stability, and other physical properties of the paint formulation or on the colorfastness of the paint films.

PULP AND PAPER

To protect coatings, finishes, and printing colors based on starch and latex (natural and synthetic) from bacterial and fungal attack, add 0.1-0.2% DOWICIL 150 Antimicrobial by wt of the formulation. Add as an aqueous solution. These concentrations will protect against bacterial and fungal growth for 3-6 days. Longer periods of preservation require higher concentrations.

TEXTILES

To prevent spoilage of spinning emulsions for rayon and finishing solutions, and to prevent viscosity and pH changes in printing pastes caused by bacteria and fungi, add 0.1-0.2% DOWICIL 150 Antimicrobial by wt of the formulation. Add as an aqueous solution.

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 when used in accordance with directions under normal conditions of use. **THE WARRANTIES MADE IN THIS PARAGRAPH ARE BELLETT'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.**

Produced for:



THE DOW CHEMICAL COMPANY
 Midland, Michigan 48674 U.S.A.
 (313)636-4400

© TM Trademark of The Dow Chemical Company ("Dow")
 or an affiliated company of Dow
 Made in U.S.A.

NET WT. : 22.68 kg / 50 lb

3
8
3