

464-327

12-10-2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

DEC 10 2009

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Abigail Trueblood, Senior Regulatory Specialist  
The Dow Chemical Company  
1803 Building  
Midland, MI 48674

Subject: Notification per PR Notice 98-10  
Dowicil™ 150 Preservative  
EPA Registration Number: 464-327  
Application Date: November 10, 2009  
Receipt Date: November 12, 2009

Dear Ms. Trueblood:

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

**Proposed Notification:**

- Label revision per PR Notice 2007-4.

**General Comments:**

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

Should you have further questions concerning this letter, please contact me at 703-308-6427 or by email at [carlisle.shaRon@epa.gov](mailto:carlisle.shaRon@epa.gov) or Killian Swift by telephone at 703-308-6346 or by email at [swift.killian@epa.gov](mailto:swift.killian@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in cursive script, appearing to read "ShaRon Carlisle".

ShaRon Carlisle  
(Acting) 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	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DOWICIL150 Preservative	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 update label as required by PR Notice 2007-4. Enclosed cover letter contains required Notification Certification

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 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) Fiber Drum	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50&251bb/2oz		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 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 Abigail Trueblood	Title Senior Regulatory Specialist	Telephone No. (Include Area Code) 847-808-3555
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.		6. Date Application Received (Stamped)
2. Signature <i>Abigail Trueblood</i>	3. Title Senior Regulatory Specialist	
4. Typed Name Abigail Trueblood	5. Date 11-10-09	



November 10, 2009

The Dow Chemical Company  
1500 E. Lake Cook Road  
Buffalo Grove, IL 60089  
USA

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

Re: NOTIFICATION- EPA Reg. No. 464-327  
DOWICIL™ 150 Preservative  
The Dow Chemical Company

Dear Ms Carlisle:

The Dow Chemical Company (Dow) hereby submits a label Notification to revise the container disposal statement in response to PR Notice 2007-4. In order for the application to be processed the required Notification Statement is below:

**This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.**

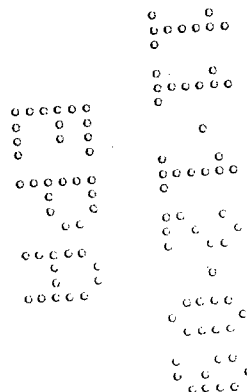
Enclosed are the following documents to support this Notification:

- EPA Form 8570-1, marked for Notification
- One copy of the proposed label with changes highlighted

Please contact me if you have any questions or need additional information.

Sincerely,

Abigail Trueblood  
Senior Regulatory Specialist  
The Dow Chemical Company  
1500 East Lake Cook Rd.  
Buffalo Grove, IL 60089  
847-808-3555  
atrueblood@dow.com



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DOWICIL 150 ANTIMICROBIAL  
Master Label  
November 3, 2009

# DOWICIL™ 150 ANTIMICROBIAL

FOR THE CONTROL OF BACTERIA AND FUNGI IN INDUSTRIAL APPLICATIONS

FOR INDUSTRIAL USE ONLY

**Active Ingredient(s):**

Cis isomer of 1-(3-chloroallyl)-3,5,7-triaza-1-azoniaadamantane chloride.....	96%
Inert Ingredient(s): .....	4%
<b>Total</b>	<b>100%</b>

**NOTIFICATION**  
 Date Reviewed: 12/10/09  
 Reviewed By: *[Signature]*

E.P.A. Registration No. 464-327  
E.P.A. Est. XXXX-XX-X

**KEEP OUT OF REACH OF CHILDREN**

## WARNING

FIRST AID	
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice</li> <li>• Have person sip a glass of water if able to swallow</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor</li> </ul>
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
HOT LINE NUMBER	
<b>IN CASE OF AN EMERGENCY</b> 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.	
<b>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage</b>	

## PRECAUTIONARY STATEMENTS

### Hazards To Humans and Domestic Animals

**WARNING.** May be fatal if absorbed through skin. Harmful if swallowed. Causes moderate eye irritation. Do not get in eyes, on skin, 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).

DOWICIL 150 ANTIMICROBIAL  
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**PHYSICAL or CHEMICAL HAZARDS**

FLAMMABLE- Keep away from heat, sparks and open flame.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and invertebrates. 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.

NOTICE: Do not ship with food, feeds drugs or clothing.

**STORAGE AND DISPOSAL**

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

**BSTORAGE:** 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 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 Waster representative of the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:**

**Nonrefillable container:** Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mix tank. Triple rinse drum liner and remove liner and dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Then offer drum for recycling if available. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

**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 for adhesives; 21 CFR 177.1680 for preservation of polyurethane resins in contact with dry bulk foods; 21 CFR 176.170 for preservation of components of paper and paperboard intended for use in contact food and 21 CFR 176.180 for preservation of components of paper and paperboard intended for use in contact with dry foods.

DOWICIL 150 Antimicrobial may be used as a preservative (inert ingredient) in water-based formulations which do not come in contact with food, food crops, feedstuffs, and water supplies

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and which are not applied to humans or food producing animals in concentrations not to exceed 0.14% by wt of the total formulation.

#### **DETERGENTS**

To prevent bacterial deterioration during storage and to increase the shelf life of biodegradable surfactants, add 0.03- 0.1% DOWICIL 150 Antimicrobial by wt of the formulation. Add as an aqueous solution.

#### **FLOOR WAX EMULSIONS AND FLOOR POLISHES**

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

#### **ADHESIVES**

To prevent pH drop, odor, gas formation, change in viscosity, and the loss of adhesives strength during manufacture, storage, and service add 0.05-0.5% DOWICIL 150 Antimicrobial by wt of 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-Derived** (animal glues such as hide, bone, fish, blood and gelatin) Add 0.1-0.5% DOWICIL 150 by wt as a concentrated aqueous solution.

**Natural Gums** (Arabic, guar and tragacanth)

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

**Natural Rubber Latex**

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

**Polyvinyl Acetate Emulsions**

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

**Synthetic Gums** (e.g. METHOCEL<sup>®</sup>™ methylcellulose gums) **and Other Synthetic-Based Adhesives**

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

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

#### **LAUNDRY STARCH**

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

#### **CONSTRUCTION MATERIALS**

To increase shelf and use life of caulking, grouting, and spackling compounds, and joint cements, add 0.06-0.15% 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.

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**NOTE: DOWICIL 150 IS INCOMPATIBLE WITH CASEIN IN BOTH LIQUID AND DRY SYSTEMS AND WITH SOME TYPES OF AMINE-MODIFIED CLAYS.**

**INKS**

To increase the shelf life of fountain pen, 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, transit, and storage of raw emulsions, add 0.05-0.15% DOWICIL 150 Antimicrobial by wt of the emulsion. Add as an aqueous solution.

**METALWORKING FLUIDS**

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

**PAINT**

To preserve cellulose-thickened 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 this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

NET WT:

**When product produced for Dow: Produced For  
Dow Diamond  
THE DOW CHEMICAL COMPANY  
Midland, Michigan 48674  
(989) 636-4400**

**™**Trademark of THE DOW CHEMICAL COMPANY ("Dow") or an affiliated company of Dow

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