

464-403

7/29/2003

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 29, 2003

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

Subject: DOWICIL 75 PRESERVATIVE
EPA Registration No. 464-403
Application Date: July 15, 2003
EPA Received Date: July 16, 2003

Dear Ms. Vance-Moeser:

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

Proposed Notification

- Alternate Brand Name "DOWICIL 75 Preservative Water-Soluble Bags"

General Comments

Based on a review of the material submitted, the following comments apply:

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

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)

CONCURRENCES						
SYMBOL	7510C					
SURNAME	Heyward					
DATE	7-29-03					

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

 Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 464 - 403	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 75 PRESERVATIVE	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) The Dow Chemical Company 1803 Building Midland, MI 48674 Attn: Rhonda Vance-Moeser <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), 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 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 add alternate brand name to DOWICIL 75 Preservative registration. Alternate name will be DOWICIL 75 Preservative Water-Soluble Bags. 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 a 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.

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<input checked="" type="checkbox"/> Paper	fiber drum
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container approx 100 lbs / 2.5 lbs / 8 oz		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued 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.		8. Date Application Received (Stamped)
2. Signature <i>Rhonda Vance-Moeser</i>	3. Title Senior Regulatory Specialist	
4. Typed Name Rhonda Vance-Moeser	5. Date <i>July 15, 2003</i>	



3 7 7

1803 BUILDING
July 15, 2003

The Dow Chemical Company
Midland, Michigan 48674

Express Mail

Mr. Adam Heyward
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

NOTIFICATION
Date Reviewed: _____
Reviewed By: _____

RE: NOTIFICATION
ALTERNATE BRAND NAME FOR DOWICIL* 75 PRESERVATIVE
EPA REGISTRATION NUMBER: 464-403

The Dow Chemical Company (Dow) hereby submits a Notification to add an alternate brand name to the registration of DOWICIL 75 Preservative, EPA registration number 464-403. We are requesting the alternate brand name be designated as DOWICIL 75 Preservative Water-Soluble Bags. The primary brand name will remain DOWICIL 75 Preservative. The Agency previously approved water-soluble packaging for this product.

The following documents are enclosed in support of this Notification:

- 1) Completed EPA application, Form 8570-1
- 2) A copy of the EPA stamped approved label for DOWICIL 75 Preservative
- 3) Three copies of the final label for DOWICIL 75 Preservative Water-Soluble Bags

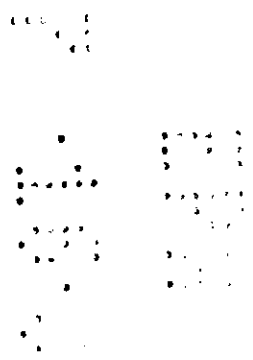
As always, if you have any questions or need additional information please contact me.

Sincerely,

Rhonda Vance-Moeser
Senior Regulatory Specialist
Dow Biocides
(989) 636-1884

Enclosures

*Trademark of The Dow Chemical Company



4 7 7

DOWICIL* 75

Preservative Water-Soluble Bags

A highly effective preservative for paints, latexes, metalworking lubricants, and other industrial formulations against deterioration from bacteria and fungi.

For Industrial Use Only

Active Ingredient(s):	
1-(3-chloroallyl)-3,5,7-triaza-1-azoniaadamantane chloride	64%
Inert Ingredient(s):	35%
Total	100%

E. P. A. Registration No. 464-403
E. P. A. Est. 464-CA-1(QT), 33973-SC-1(8D), 58493-NC-1(U3),
72208-FRA-1

Superscript used corresponds to alpha/ numeric in lot number.

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENT
Hazard to Humans and Domestic Animals
CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

Avoid Contact With Skin And Eyes • Chemical Resistant Gloves Must Be Worn When Handling • Wash Thoroughly With Soap and Water After Handling • Do Not Wear Clothing Grossly Contaminated With The Product

FIRST AID

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.
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HOT LINE NUMBER

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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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

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 or Store with Food, Feeds, Drugs, or Clothing
STORAGE AND DISPOSAL

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

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NOTIFICATION
Date Reviewed: 7-18-03
Reviewed By: S. G. V. ca. y

Pesticide Storage: Store at room temperature. Do not leave containers of this product open during storage.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on a site or at an approved waste disposal facility.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue 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: 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 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.

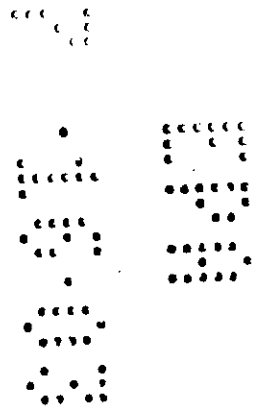
Note: Read and Follow Complete Directions for Use Given on the Removable Portion of this Label.

45.36 kg/ 100 lb net



THE DOW CHEMICAL COMPANY
Midland, Michigan 48674 U.S.A.
(989)636-4400

* Trademark of THE DOW CHEMICAL COMPANY



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DOWICIL* 75

Preservative Water-Soluble Bags

A highly effective preservative for paints, latexes, metalworking lubricants, and other industrial formulations against deterioration from bacteria and fungi.

For Industrial Use Only

Active Ingredient(s):
1-(3- chloroallyl)- 3,5,7- triaza- 1-
azoniaadamantane chloride 64%
Inert ingredient(s): 36%
Total..... 100%

E. P. A. Registration No. 464- 403
E. P. A. Est. 464- CA- 1(QT), 33973- SC- 1(8D), 58493- NC- 1(U3),
72208- FRA- 1

Superscript used corresponds to alpha/ numeric in lot number.

KEEP OUT OF REACH OF CHILDREN

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PRECAUTIONARY STATEMENT

Hazard to Humans and Domestic Animals
CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

Avoid Contact With Skin And Eyes • Chemical Resistant Gloves Must Be Worn When Handling • Wash Thoroughly With Soap and Water After Handling • Do Not Wear Clothing Grossly Contaminated With The Product

FIRST AID	
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.
HOT LINE NUMBER	
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.	

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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

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 or Store with Food, Feeds, Drugs, or Clothing
STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store at room temperature. Do not leave containers of this product open during storage.
Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on a site or at an approved waste disposal facility.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue 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: 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 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: Read and Follow Complete Directions for Use Given on the Removable Portion of this Label.



THE DOW CHEMICAL COMPANY

Midland, Michigan 48674 U.S.A.

(989)636-4400

* Trademark of THE DOW CHEMICAL COMPANY

45.36 kg/ 100 lb net

DIRECTIONS FOR USE

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

DOWICIL 75 Preservative Water-Soluble Bags, 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 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 with food; and 21 CFR 176.180 for preservation of components of paper and paperboard intended for use in contact with dry foods. DOWICIL 75 Preservative Water-Soluble Bags 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, and which are not applied to humans or food producing animals, in concentrations not to exceed 0.2% by wt of the total formulation.

Preparation and storage of solutions of DOWICIL 75 Preservative Water-Soluble Bags are best done in vented vessels. Special precautions must be taken if an air-tight container is used since a concentrated solution can develop pressure in a closed system, especially if it becomes contaminated with an acid (causing the release of carbon dioxide).

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

ADHESIVES

To prevent pH drop, odor, gas formation, change in viscosity, and loss of adhesive strength during manufacture, storage, and service, add 0.07 - 0.66% DOWICIL 75 Preservative Water-Soluble Bags 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 0.13 - 0.27% DOWICIL 75 Preservative Water-Soluble Bags by wt as a concentrated aqueous solution.

Protein-Derived (animal glues such as hide, bone, fish, blood, and gelatin)
Add 0.13 - 0.66% DOWICIL 75 Preservative Water-Soluble Bags by wt as a concentrated aqueous solution.

Natural Gums (arabic, guar, and tragacanth)
Add 0.07- 0.27% DOWICIL 75 Preservative Water-Soluble Bags by wt as a concentrated aqueous solution. Highly concentrated gums do not support readily bacterial or fungal growth; consequently, higher concentrations of DOWICIL 75 Preservative Water-Soluble Bags are required in the less concentrated gum solutions.

Natural Rubber Latex
Add 0.07 - 0.2% DOWICIL 75 Preservative Water-Soluble Bags by wt as a concentrated aqueous solution.

Polyvinyl Acetate Emulsions
Add 0.07 - 0.2% DOWICIL 75 Preservative Water-Soluble Bags by wt as a concentrated aqueous solution.

Synthetic Gums (e. g., METHOCEL * methylcellulose gums) and Other Synthetic-Based Adhesives

Add 0.07 - 0.2% † DOWICIL 75 Preservative Water-Soluble Bags 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 preservative recommended for the adhesive containing only the natural material.

CONSTRUCTION MATERIALS

To increase shelf and use life of caulking, grouting, spackling compounds, and joint cements, add 0.07 - 0.3% DOWICIL 75 Preservative Water-Soluble Bags 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 75 PRESERVATIVE WATER-SOLUBLE BAGS IS INCOMPATIBLE WITH CASEIN IN BOTH LIQUID AND DRY SYSTEMS, AND WITH SOME TYPES OF AMINE-MODIFIED CLAYS.

DETERGENTS

To prevent bacterial deterioration during storage and to increase the shelf life of biodegradable surfactants, add 0.04 - 0.13% DOWICIL 75 Preservative Water-Soluble Bags 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 0.07 - 0.2% DOWICIL 75 Preservative Water-Soluble Bags by wt of the formulation. Add as an aqueous solution.

INKS

To increase the shelf life of water-based fountain pen, fabric, and paper printing inks, add 0.2 - 0.27% DOWICIL 75 Preservative in Water-Soluble Bags 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 - 0.3% DOWICIL 75 Preservative Water-Soluble Bags by wt of the total emulsion. Add as an aqueous solution.

LAUNDRY STARCH

To increase shelf and use life of liquid formulations, add 0.07 - 0.2% DOWICIL 75 Preservative Water-Soluble Bags by wt of the formulation. Add as an aqueous solution.

METALWORKING FLUIDS

To control bacterial contamination that produces odors, rancidity, acidity, and destruction of soluble cutting oils, add 0.015% minimum DOWICIL 75 Preservative Water-Soluble Bags by wt of the formulation. Add to the water phase of the cutting fluid during formulation. In case of severe microbial contamination, higher concentrations of DOWICIL 75 Preservative Water-Soluble Bags may be required. Concentrations of 0.1 - 0.25% DOWICIL 75 Preservative Water-Soluble Bags by wt are suggested for control of bacteria and fungi in recirculating metalworking lubricant systems.

PAINT

To preserve cellulose-thickened latex paints in the can, add 0.01 - 0.2% DOWICIL 75 Preservative Water-Soluble Bags 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 75 Preservative Water-Soluble Bags has no effect on the viscosity, stability, and other physical properties of the paint formulation or on the colorfastness of the paint films.

PETROLEUM PRODUCTION AND RECOVERY

For use with closed delivery systems only.
To prevent bacterial growth in recirculated muds, packer fluids, and underground strata, add 0.075 - 0.125 lb (300-500 ppm) DOWICIL 75 Preservative Water-Soluble Bags per barrel of mud or packer fluid, and 25- 50 ppm in underground water flooding. Add as an aqueous solution.

PULP AND PAPER

To protect coatings, finishes, and printing colors based on starch and latex (natural and synthetic) from bacterial and fungal attack, add 0.13 - 0.27% DOWICIL 75 Preservative Water-Soluble Bags 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 0.13 - 0.27% DOWICIL 75 Preservative Water-Soluble Bags by wt of the formulation. Add as an aqueous solution.