

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

November 29, 2006

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

Subject: Dowacil 75 Preservative
EPA Registration No.: 464-403
Application Date: November 7, 2006
Receipt Date: November 15, 2006

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

- Add the words "produced for" to the label.
- Revise trademark language on label.

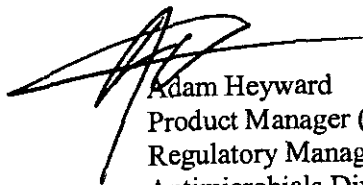
General Comments

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

The notification application is acceptable and 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 (7510P)

CONCURRENCES

YMBOL	7510P							
JRNAME	Grabin							
DATE	11/29/06							

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Registration

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

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 (TM) 75 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

Amendment - Explain below. Final printed labels in response to Agency letter dated _____
 Resubmission in response to Agency letter dated _____ "Me Too" Application.
 Notification - Explain below. 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 labels when product contract manufactured
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:

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"/> Text <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>Fiber drum</u>
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container
1000/100/2.5 lb

5. Location of Label Directions
 On Label On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued Other _____
 Stenciled

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) 989-636-1894
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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.

C. DLte Application Received (Stamped)

2. Signature <i>Rhonda Vance-Moeser</i>	3. Title Senior Regulatory Specialist
4. Typed Name Rhonda Vance-Moeser	5. Date <i>November 13, 2006</i>



3 2 8
The Dow Chemical Company
Midland, Michigan 48674
USA

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November 7, 2006

Overnight Mail

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

**RE: NOTIFICATION – EPA REG. NO. 464 – 403
DOWICIL™ 75 PRESERVATIVE**

The Dow Chemical Company (Dow) hereby submits a Notification application to:

- 1) add the qualifier "Produced For" to the registrant name and address on the product label when produced by a contract manufacturer
- 2) revise the trademark language on the product label

In order for the application to be processed the required Notification statement is included.

"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 enforcement action and penalties under section 12 and 14 of FIFRA"

Enclosed are the following documents to support this notification

- 1) Completed application for Pesticide Registration, Form 8570-1
- 2) Required notification statement above
- 3) Two copies of product label with one indicating changes highlighted in yellow.

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

Sincerely,

Rhonda Vance-Moeser
Senior Regulatory Specialist
1691 North Swede Road
Midland, MI 48674
Phone: (989) 636-1884
e-mail: rgvmoeser@dow.com

Enclosures

CHANGES 478
HIGHLIGHTED
IN YELLOW

DOWICIL™ 75 PRESERVATIVE

A highly effective preservative to protect household, institutional and 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%

NOTIFICATION
Date Reviewed: 11-29-06
Reviewed By: AGG/ALU

E.P.A. Registration No. 464-403
E.P.A. Est.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Precautionary Statements
Hazards 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 • Do not wear clothing grossly contaminated with the product.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 minutes • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call poison control center or doctor 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 15 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
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 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.

PESTICIDE STORAGE AND DISPOSAL

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

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

Pesticide storage: Store at room temperature below 140 F. Keep product in a closed container when not in use.

For Product Supplied in Water-Soluble Bags: Store in a dry place between 40 F and 140 F.

Pesticide Disposal: Waste 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 local authorities. Dispose of drums in the same manner.

DIRECTIONS FOR USE

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

DOWICIL 75 Preservative 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.

PESTICIDE FORMULATIONS

DOWICIL 75 Preservative 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.

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 the loss of adhesives strength during manufacture, storage, and service add 0.07-0.66% DOWICIL 75 Preservative by wt of the formulation. Add at a suitable point in the manufacturing process.

For use in the following types of adhesives:

Starch Based (corn, tapioca, sago, potato, etc)
Add 0.13%-0.27% DOWICIL 75 Preservative

Protein-Derived (animal glues such as hide, bone, fish, blood and gelatin) Add 0.13-0.66%
DOWICIL 75 Preservative

Natural Gums (Arabic, guar and tragacanth)
Add 0.07-0.27% DOWICIL 75 Preservative
Highly concentrated gums do not readily support bacterial or fungi growth; consequently, higher concentrations of DOWICIL 75 Preservative are required in the less concentrated gum solutions.

Natural Rubber Latex
Add 0.07-0.2% DOWICIL 75 Preservative

Polyvinyl Acetate Emulsions
Add 0.07-0.2% DOWICIL 75 Preservative

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

Add 0.07-0.2%† DOWICIL 75 Preservative

†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.

CONSTRUCTION MATERIALS

To increase shelf and use life of: caulking, grouting, spackling compounds, joint cements, Construction adhesives, tape joint compounds, concrete admixes and sealing coatings
Add 0.07-0.3% DOWICIL 75 Preservative by wt of the formulation.

NOTE: DOWICIL 75 PRESERVATIVE IS INCOMPATIBLE WITH CASEIN IN BOTH LIQUID AND DRY SYSTEMS AND WITH SOME TYPES OF AMINE-MODIFIED CLAYS. HOUSEHOLD INSTITUTIONAL & INDUSTRIAL POLISHES AND WAXES

To prevent deterioration during storage and to increase the shelf life of end use water based polishes and waxes, add 0.07-0.2% Dowicil 75 preservative by wt of the formulation. Add at a suitable point during the manufacturing process.

LATEX EMULSIONS

To prevent bacterial deterioration during manufacture, transit, and storage of raw emulsions, add 0.05-0.3% DOWICIL 75 Preservative by wt of the Emulsion. Add at a suitable point during manufacturing.

METALWORKING FLUIDS

To control bacterial contamination that produces odors, rancidity, acidity and destruction of soluble cutting oils, add 0.015% minimum DOWICIL 75 Preservative 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 may be required. Concentrations of 0.1-0.25% DOWICIL 75 Preservative by wt are suggested for control of bacteria and fungi in recirculating metalworking lubricant systems.

PAINT, COATINGS & INKS

To preserve water-based paints, coatings and inks, add 0.01-0.25% DOWICIL 75 Preservative by wt of the formulation. . Add at a suitable point during the manufacturing process.

8 7 8

DOWICIL 75 PRESERVATIVE
Final Master Label
Page 5 of 5
November, 2006

PACKER FLUIDS, RECIRCULATED MUDS AND UNDERGROUD STRATA

For use with closed delivery systems only.

To prevent bacterial growth in recirculated muds, packer fluids, and underground strata, add 0.03 - 0.05% DOWICIL 75 Preservative by wt of mud or packer fluid. Add .0025 - .005 % by wt underground water flooding. Add at a suitable point in the closed delivery system.

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 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.

TEXTILE FINISHING AND SPINNING FLUIDS

To prevent spoilage of textile finishing and spinning solutions and add 0.13-0.27% DOWICIL 75 Preservative by wt of the formulation. Add at a suitable point in the manufacturing process.

HOUSEHOLD, INSTITUTIONAL AND INDUSTRIAL CLEANING & LAUNDRY PRODUCTS

To prevent deterioration during storage and to increase the shelf life of end use water based household, institutional and industrial cleaning products, add up to 0.2% by weight of DOWICIL 75 Preservative to the formulation. Point of addition during manufacture depends on type of formulation and manufacturing process. May be added dry or as a concentrated 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:

Produced For

Dow Diamond ®
THE DOW CHEMICAL COMPANY
Midland, Michigan 48674 USA
(989) 636-4400

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