

464-403

12-01-2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

FILE COPY

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OFFICE OF  
PREVENTION, PESTICIDE  
AND TOXIC SUBSTANCES

Abigail Trueblood  
Senior Regulatory Specialist  
The Dow Chemical Company  
1500 East Lake Cook Rd.  
Buffalo Grove, IL 60089

Subject: DOWICIL™ 75 Preservative  
EPA Registration No. 464-403  
Application Date: November 10, 2009  
Receipt Date: November 12, 2009

Dear Ms. Trueblood:

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

**Proposed Amendment:**

- Update Storage and Disposal language

**Other Comment(s):**

Future labeling amendments may be accomplished by submitting a copy of the electronic label. Refer to the following website for guidance on electronic submissions, including label: <http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm>.

If you have any questions concerning electronic label submissions, please refer to the above website for a list of contact personnel for more information.

Enclosed is a copy of the stamped labeling.

**General Comment:**

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6427 or by e-mail at [carlisle.sharon@epa.gov](mailto:carlisle.sharon@epa.gov) or Heather Garvie by telephone at (703) 308-0034 or by e-mail at [garvie.heather@epa.gov](mailto:garvie.heather@epa.gov) during the hours of 8:00am to 4:00pm EST. 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 that reads "ShaRon Carlisle".

ShaRon Carlisle  
(Acting) Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosed: Stamped Labeling



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	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DOWICIL 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)(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 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:

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 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 Stenciled  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
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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.

2. Signature  
*Abigail Trueblood*

3. Title  
Senior Regulatory Specialist

4. Typed Name  
Abigail Trueblood

5. Date  
11-10-09

6. Date Application Received  
(Stamped)



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. 464-403  
DOWICIL™ 75 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

DOWICIL 75 PRESERVATIVE  
 Master Label  
 November 3, 2009

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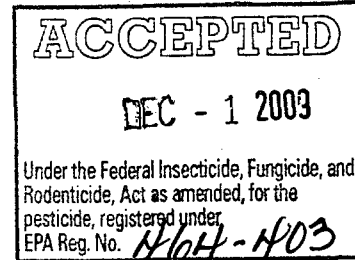
# DOWICIL™ 75 PRESERVATIVE

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%
<b>Total</b>	<b>100%</b>



E.P.A. Registration No. 464-403  
 E.P.A. Est. XXXX-XX-X

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

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

## 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.

DOWICIL 75 PRESERVATIVE  
Master Label  
November 3, 2009

#### 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.

#### 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:

**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 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

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DOWICIL 75 PRESERVATIVE  
Master Label  
November 3, 2009

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<sup>SM</sup> 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**

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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.

**PACKER FLUIDS, RECIRCULATED MUDS AND UNDERGROUND 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 0.0025 - 0.005 % 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.

DOWICIL 75 PRESERVATIVE  
Master Label  
November 3, 2009

NET WT:

When product produced for Dow: Produced For

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

<sup>3</sup>  
™ Trademark of THE DOW CHEMICAL COMPANY ("Dow") or an affiliated company of  
Dow