



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 2, 2011

Mrs. Rhonda Vance-Moeser  
Product Stewardship Regulatory Manager  
1691 N. Swede Road Larkin Lab  
Midland, MI 48674

Subject: DOWICIL 75 Preservative  
EPA Registration Number: 464-403  
Application Date: October 13, 2011  
EPA Receipt Date: October 17, 2011

Dear Mrs. Vance-Moeser:

The following amendment, submitted in connection with registration under section of the federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following label change(s):

Proposed label amendment:

- Add new heading "**OIL AND GAS PRODUCTION USES**" and separate subheadings, outlining specific use sites and rates.

Labeling comment(s)

1. Under the new heading OIL AND GAS PRODUCTION USES, add the following statement:

"(For Use with Closed Delivery System Only)"

2. The percentages of active and other ingredients should be aligned by the decimal point as such:

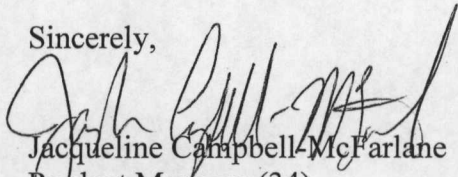
|                                     |              |
|-------------------------------------|--------------|
| 1-(3-chloroallyl)-3, 5, 7-triaza-1- |              |
| Azoniaadamantane chloride.....      | 64.0%        |
| <u>Other Ingredients.....</u>       | <u>36.0%</u> |
| Total                               | 100.0%       |

General Comments:

Submit three copies of the final printed label for the record. A stamped copy of the label is enclosed for your record.

Should you have any questions or comments concerning this letter, please contact Adam Heyward via email at [heyward.adam@epa.gov](mailto:heyward.adam@epa.gov) or by telephone at (703) 347-0274 during the hours of 6:00 am to 2:30 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



Jacqueline Campbell-McFarlane  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosure: A copy of the stamped label.

DOWICIL 75 PRESERVATIVE  
Master Label  
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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%  
Total 100%

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

E.P.A. Est. XXXX-XX-X

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

NOV - 2 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No.

464-403

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

| FIRST AID   |   |
|---|---|
| <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 minutes</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continuing rinsing eye</li> <li>• Call poison control center or doctor for treatment advice</li> </ul> |
| <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 immediately for treatment advice</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 and before eating, drinking, chewing gum, using tobacco, or using the toilet. Avoid contact with



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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).

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.

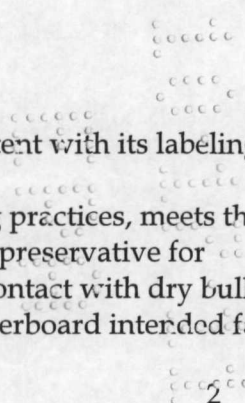
CONTAINER DISPOSAL:

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



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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.

*Additional Directions for Use information for product packaged in 2 1/2 lb water soluble bags.*

Refer to the table below as a formulation guide:

| DOWICIL 75 Water Soluble Bags | Formulation Weight (lbs) | Percent Solution |
|-------------------------------|--------------------------|------------------|
| 1                             | 100,000                  | 0.0025           |
| 1                             | 5,000                    | 0.05             |
| 1                             | 2,500                    | 0.1              |
| 1                             | 1,250                    | 0.2              |
| 1                             | 1,000                    | 0.25             |

**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>™</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**

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.

✓ **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.

## OIL AND GAS PRODUCTION USES:

**WATER FLOODS:** DOWICIL 75 Preservative should be added to a water flood system at a point of uniform mixing. Add 25 to 500 ppm DOWICIL 75 Preservative to the system weekly, or as need to maintain control.

**FRACTURING FLUIDS:** DOWICIL 75 reduces bacterial contamination and degradation of fracturing fluids and gels used in oil and gas well stimulations. Add DOWICIL 75 Preservative to the fracturing water storage tanks, to the solid blend system, or directly into the well head injection pipeline as the water is being pumped down-hole.

Dose Range: DOWICIL 75 Preservative should be added at a rate of 25 to 500 ppm, depending on the degree of bacterial fouling in the source water.

**DRILLING, COMPLETION, AND WORKOVER FLUIDS:** Dowicil 75 Preservative should be added to a drilling fluid system at a point of uniform mixing, such as the circulating mud tank. Initial Treatment: Add 25 to 500 ppm DOWICIL 75 Preservative to a freshly prepared fluid, depending on the severity of contamination.

Maintenance Dosage: Maintain a concentration of 25-500 ppm DOWICIL 75 Preservative as needed, depending on the severity of contamination.

**PACKER FLUIDS:** DOWICIL 75 Preservative should be added to a packer fluid at a point of uniform mixing, such as a circulating holding tank. Add 25-500 ppm DOWICIL 75 Preservative to freshly prepared fluid, depending on the severity of contamination. Seal the treated packer fluid in the wall between the casing and production tube.

**INJECTION FLUIDS:** For the control of contamination and corrosion from bacterial sources in fluids/waste fluids that are disposed of through injection into an approved well, following approved guidelines, add DOWICIL 75 Preservative as a dry product or pre-dissolved in each volume of fluid prior to injection.

Frequency and Dose: DOWICIL 75 Preservative should be added at a rate of 25-500 ppm based in the water percent of the injection fluid.

**WELL SQUEEZE FLUIDS:** For the effective control of aerobic and anaerobic bacteria in squeeze fluids and downhole well bore areas, add DOWICIL 75 Preservative during pre-mixing of the well squeeze fluid or (in the case of direct mix injection systems) an aqueous solution may be added by direct injection at the well head during the well squeeze procedure.

Frequency And Dose: DOWICIL 75 Preservative should be used for each well squeeze operation to ensure best results. Add DOWICIL 75 Preservative at a concentration of 25-500 ppm, depending on the quality of the makeup water.

**PRODUCED WATER:** To inhibit the growth of slime-forming or corrosion-inducing sulfate-reducing bacteria in formation water produced by wells together with oil or gas,



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DOWICIL 75 Preservative may be used as the solid or pre -dissolved in a quantity of water, then injected into the water -containing oil or gas stream at any convenient point. It should be injected as slug doses, not as a continuous feed.

Frequency And Dose: Depending on severity and rapidity of contamination, DOWICIL 75 Preservative should be slug-dosed from once a week to once a month at 25 to 500 ppm.

**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

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

