



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 8, 2016

Ms. Alexis Chapman
The Dow Chemical Company
1501 Larkin Center Drive
Midland, MI 48674

Subject: Notification per PRN 98-10 – Update the 21 CFR 176.170 statement
Product Name: Dowicil 75 Preservative
EPA Registration Number: 464-403
Application Date: January 4, 2016
Decision Number: 514746

Dear Ms. Chapman:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Jacqueline Hardy at (703)308-6416 or via email at hardy.jacqueline@epa.gov.

Sincerely,

A handwritten signature in red ink that reads "Jacqueline Hardy".

Jacqueline Hardy, Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

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.....64.0 %
Other Ingredient(s):36.0 %
Total 100.0%

NOTIFICATION

464-403

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

3/8/2016

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

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

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
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 continuing 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 immediately for treatment advice
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>	

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 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).

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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 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 **with** 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.

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Additional Directions for Use information for product packaged in 2 ½ 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[®]™ 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.

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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.

COLORANTS AND DISPERSED PIGMENTS

Product not registered for this use in California- Optional

To preserve colorants and dispersed pigments, add 0.025-0.25% 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: FOR USE WITH CLOSED DELIVERY SYSTEM ONLY

WATER FLOODS

Product not registered for this use in California-Optional

Add DOWICIL 75 Preservative 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 needed to maintain control.

FRACTURING FLUIDS

Product not registered for this use in California-Optional

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

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DRILLING, COMPLETION, AND WORKOVER FLUID

Product not registered for this use in California-Optional

Add Dowicil 75 Preservative 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 to 500 ppm DOWICIL 75 Preservative as needed, depending on the severity of contamination.

PACKER FLUIDS

Add DOWICIL 75 Preservative to a packer fluid at a point of uniform mixing, such as a circulating holding tank. Add 25 to 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

Product not registered for this use in California-Optional

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: Dose DOWICIL 75 Preservative at a rate of 25 to 500 ppm based in the water percent of the injection fluid.

WELL SQUEEZE FLUIDS

Product not registered for this use in California-Optional

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: Use DOWICIL 75 Preservative for each well squeeze operation to ensure best results. Add DOWICIL 75 Preservative at a concentration of 25 to 500 ppm, depending on the quality of the makeup water.

PRODUCED WATER

Product not registered for this use in California-Optional

To inhibit the growth of slime -forming or corrosion -inducing sulfate-reducing bacteria in formation water produced by wells together with oil or gas, 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. Inject as slug doses, not as a continuous feed.

Frequency And Dose: Depending on severity and rapidity of contamination, slug-dose DOWICIL 75 Preservative 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.

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NET WT:

Produced for (used when manufactured by a contract manufacturer)

Dow Diamond

THE DOW CHEMICAL COMPANY

Midland, Michigan 48674

(989) 636-4400

TMTrademark of THE DOW CHEMICAL COMPANY (“Dow”) or an affiliated company of Dow