

464-496

03/30/2004

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

March 30, 2004

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

Subject: Antimicrobial 8536  
EPA Registration No. 464-496  
Application Date: February 27, 2004  
EPA Received Date: March 2, 2004

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 Amendment**

- Revised Storage and Disposal Statements

**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 (7510 C)

CONCURRENCES							
SYMBOL	7510C						
SURNAME	Heyward						
DATE	3/30/04						

**NOTIFICATION**  
 Date Reviewed: 3-30-04  
 Reviewed By: [Signature]

**NOTIFICATION**  
 Date Reviewed: 3  
 Reviewed By: [Signature]

# Antimicrobial 8536

Controls bacteria, fungi and yeasts in paper mills, metalworking fluids containing water, and enhanced oil recovery systems; controls bacteria, fungi, and algae in industrial recirculating water cooling towers and in once-through fresh and sea water industrial cooling water systems; controls slime-forming bacteria and fungi in air-washer systems.

**FOR INDUSTRIAL USE ONLY**

Active Ingredient(s)  
 2,2-Dibromo-3-nitropropionamide.....5%  
 Inert Ingredient(s)..... 95%  
 Total 100%

E.P.A. Registration No. 464-496  
 E.P.A. Est. 464-MI-1

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**PRECAUTIONARY STATEMENTS**

Hazards to Humans and Domestic Animals

**DANGER • CAUSES SEVERE BURNS OF EYES • CAUSES SKIN IRRITATION • HARMFUL IF SWALLOWED**

Do Not Get In Eyes, On Skin, Or On Clothing • Wear Chemical Worker's Goggles When Handling • Wash Thoroughly After Handling

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. Apply this product only as specified on this label. Do not contaminate water by cleaning of equipment, or disposal of wastes. NOTE: 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.

**THE DOW CHEMICAL COMPANY**

Midland, Michigan 48674 U.S.A.  
 (989)636-4400

\* Trademark of THE DOW CHEMICAL COMPANY

FIRST AID:	
<b>IF IN EYES</b>	• Hold eye open and rinse slowly and gently with water for 30 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
<b>IF ON SKIN OR CLOTHING</b>	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
<b>IF SWALLOWED</b>	• 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	
<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.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

**PESTICIDE STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal. Pesticide Storage: To maintain product quality, store at temperatures below 60°C. Keep container tightly closed when not in use. Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Container Disposal: Do not reuse empty container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with the labeling. NOTE: ADD ANTIMICROBIAL 8536 SEPARATELY TO THE SYSTEM. DO NOT MIX IT WITH OTHER ADDITIVES, IN ORDER TO AVOID DECOMPOSITION OF ANTIMICROBIAL 8536 DUE TO THE HIGH PH OF MANY ADDITIVE FORMULATIONS.



**NOTICE**  
 Do Not Ship or Store with Food, Feeds, Drugs, or Clothing

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**PAPER MILLS**

For the control of bacterial, fungal, and yeast growths in pulp, paper, and paperboard mills, add ANTIMICROBIAL 8536 at the rate of 0.06-0.21 gal/ton of pulp or paper (dry basis). Addition may be continuous or intermittent, depending upon the type of system and the severity of contamination. It should be made with a metering pump at a location that will insure uniform distribution of ANTIMICROBIAL 8536 in the mass of fiber and water, such as the beaters, jordan inlet or discharge, broke chests, furnish chests, save-alls, and white-water tanks. HEAVILY FOULED SYSTEMS should be boiled out, then treated with 0.06-0.15 gal ANTIMICROBIAL 8536/ton of paper (dry basis), as necessary for control. MODERATELY FOULED SYSTEMS should be treated continuously with 0.15-0.21 gal ANTIMICROBIAL 8536/ton of paper (dry basis) until the slime accumulation is controlled. Addition rates can then be reduced to 0.06-0.15 gal ANTIMICROBIAL 8536/ton of paper on a continuous or intermittent basis, as needed for control. Dislodged slime may cause breaks in the paper and a clean-up of the paper machine may be advisable. SLIGHTLY FOULED SYSTEMS should be treated continuously with 0.06-0.15 gal ANTIMICROBIAL 8536/ton of paper (dry basis) until slime is controlled, then added on an intermittent basis to maintain control.

**METALWORKING FLUIDS CONTAINING WATER**

This product is effective in metalworking fluid concentrates which have been diluted in water at ratios of 1:100-1:4. For controlling (or inhibiting) the growth of bacteria, fungi, and yeasts that may deteriorate metalworking fluids containing water, add ANTIMICROBIAL 8536 to the fluid in the collection tank. Additions should be made with a metering pump. INITIAL or SLUG DOSE: When the system is just noticeably fouled, add 1.1 gal ANTIMICROBIAL 8536/1,000 gal of metalworking fluid to the system. Repeat until control is achieved. SUBSEQUENT DOSE: When microbial control is evident, add 0.44-0.88 gal ANTIMICROBIAL 8536/1,000 gal of metalworking fluid per day, or as needed to maintain control. Additions can be made continuously or intermittently. Slug the system as required.

**ENHANCED OIL RECOVERY SYSTEMS**

For controlling slime-forming bacteria, sulfide-producing bacteria, yeasts, and fungi in oil field water; polymer or micellar floods, water-disposal systems, or other oil field water systems, add 4-320 ppm ANTIMICROBIAL 8536 (0.4-28.6 gal ANTIMICROBIAL 8536 per 2400 barrels of water) depending on the severity of the contamination. Additions should be made with a metering pump either continuously or intermittently. CONTINUOUS FEED METHOD When the system is noticeably fouled, add 40-320 ppm ANTIMICROBIAL 8536 (3.6-28.6 gal ANTIMICROBIAL 8536 per 2400 barrels of water) continuously, until the desired degree of control is achieved. Subsequently, treat with 4-60 ppm ANTIMICROBIAL 8536 (0.4-5.4 gal ANTIMICROBIAL 8536 per 2400 barrels of water) continuously or as needed to maintain control. INTERMITTENT or SLUG METHOD When the system is noticeably fouled, or to maintain control of the system, add 40-320 ppm ANTIMICROBIAL 8536 (3.6-28.6 gal ANTIMICROBIAL 8536 per 2400 barrels of water) intermittently for 4-8 hours per day, and from 1-4 times per week, or as needed depending on the severity of contamination. Addition of ANTIMICROBIAL 8536 may be made at the free water knockouts, before or after the injection pumps and injection well headers. NOTE: FOR CONTROL OF BACTERIA, YEAST, AND FUNGI IN AQUEOUS SOLUTIONS OF BIOPOLYMER USED IN FLOODING OPERATIONS, add 60-320 ppm ANTIMICROBIAL 8536 (5.4-28.6 gal ANTIMICROBIAL 8536 per 2400 barrels of water). Additions of ANTIMICROBIAL 8536 should be made with a metering pump IMMEDIATELY after preparation of the aqueous biopolymer solution to prevent loss of viscosity.

**INDUSTRIAL RECIRCULATING WATER COOLING TOWERS**

Add ANTIMICROBIAL 8536 to the basin (or any other point of uniform mixing). Addition should be made with a metering pump; it may be continuous or intermittent, depending on the severity of the contamination when treatment is begun, and the retention time in the system. Optimum performance with this product is attained by continuous or intermittent treatment. If "shock" treatment is used, the blowdown should be discontinued for 24-48 hours. FOR CONTROL OF BACTERIA Add 0.0038-0.038 gal ANTIMICROBIAL 8536/1,000 gal of water in the system, depending on the severity of contamination. INTERMITTENT or SLUG METHOD INITIAL DOSE: When the system is noticeably fouled, add 0.019-0.192 gal ANTIMICROBIAL 8536/1,000 gal of water in the system. Repeat until control is achieved. SUBSEQUENT DOSE: When microbial control is evident, add 0.0095-0.038 gal ANTIMICROBIAL 8536/1,000 gal of water in the system every 4 days, or as needed to maintain control. BADLY FOULED SYSTEMS must be cleaned before treatment is begun. CONTINUOUS FEED METHOD INITIAL DOSE: When the system is noticeably fouled, add 0.019-0.192 gal ANTIMICROBIAL 8536/1,000 gal of water to the system. SUBSEQUENT DOSE: Maintain this level by pumping a continuous feed of 0.0038-0.019 gal ANTIMICROBIAL 8536/1,000 gal of water in the system per day. BADLY FOULED SYSTEMS must be cleaned before treatment is begun. FOR CONTROL OF FUNGI AND ALGAE Add 0.116-0.380 gal ANTIMICROBIAL 8536/1,000 gal of water in the system depending on the severity of the contamination. INTERMITTENT or SLUG METHOD INITIAL DOSE: When the system is noticeably fouled, add 0.192-0.192 gal ANTIMICROBIAL 8536/1,000 gal of water in the system. Repeat until control is achieved. SUBSEQUENT DOSE: When microbial control is evident, add 0.116-0.380 gal ANTIMICROBIAL 8536/1,000 gal of water in the system daily, or as needed to maintain control. BADLY FOULED SYSTEMS must be cleaned before treatment is begun. CONTINUOUS FEED METHOD INITIAL DOSE: When the system is noticeably fouled, add 0.192-0.192 gal ANTIMICROBIAL 8536/1,000 gal of water to the system. SUBSEQUENT DOSE: Maintain this treatment level by pumping a continuous feed of 0.116-0.380 gal ANTIMICROBIAL 8536/1,000 gal of water in the system per day. BADLY FOULED SYSTEMS must be cleaned before treatment is begun.



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1803 Building  
February 27, 2004

The Dow Chemical Company  
Midland, Michigan 48674

Express Mail

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

RE: NOTIFICATION - ANTIMICROBIAL 8536 -- EPA REG. NO. 464-496

Dear Mr. Heyward:

The Dow Chemical Company (Dow) hereby submits a Notification to change the storage and disposal statement. We request to remove the following statement from the label:

"Reusable Portable Containers (Totes): Do NOT rinse containers. Do not put any other material(s) in containers. Seal all openings with proper fittings and clean outside of container. Then return container to The Dow Chemical Company."

This is being requested since Dow **does not ship this product in returnable totes**. This product is shipped in only one way totes.

The following documents are enclosed in support of this Notification:

1. Application for Pesticide Registration, Form 8570-1
2. Two copies of the final printed label.

Please feel free to contact me if you have any questions or need additional information regarding this Notification.

Sincerely,

Rhonda Vance-Moeser  
Senior Regulatory Specialist  
Dow Biocides  
(989) 636-1884  
e-mail: [rgvmoeser@dow.com](mailto:rgvmoeser@dow.com)

Enclosures



Please read instructions on reverse before completing form.

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

United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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### Application for Pesticide - Section I

1. Company/Product Number 464-496	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow Chemical / Antimicrobial 8536	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)(i), 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 of change in storage and Disposal Statement per PR Notice 98-10. Refer to cover letter for verbiage to be removed. "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 labelling 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:			
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input checked="" type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Notification must be submitted		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt    No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 55 gallons/ 300 gallons / 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
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<b>Certification</b> 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.		6: 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>Feb. 27, 2004</i>	