

464-620

1/20/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JAN 20 2010

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Subject: Antimicrobial DTEA
EPA Registration Number: 464-620
Application Date: October 21, 2009
Receipt Date: October 22, 2009

Dear Ms. Vance-Moeser:

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

Proposed Amendment:

- Revise label language in response to registration review.
- Revise warranty statement

Conditions

Revise the label as follows:

1.) The "Precautionary Statements" modification is incomplete because it does not address, this product's complete acute toxicity profile as outlined in the October 20, 1993 Registration Notice and stamped accepted label or the March 6, 1996 letter from CA Department of Registration. According to these documents and your agreement to waive acute inhalation and accept the default toxicity I category, this product's acute toxicology profile is:

Data Requirement	Means of Support	Status/Tox. Category
Acute Oral Toxicity	Submitted study, MRID 40126504	Acceptable/ IV
Acute Dermal Tox.	Submitted study, MRID 40126505	Acceptable/ III
Acute Inhalation Tox.	Waived	Acceptable/ I
Eye Irritation	Submitted study, MRID 40126506	Acceptable/ I
Skin Irritation	Submitted study, MRID 40126507	Acceptable/ II: CADPR I
Skin Sensitization	Submitted study, MRID 40126508	Acceptable/ Non-sensitizer

SYMBOL	SURNAME	DATE

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

According to 40 CFR 156.10 (h)(i)(A), POISON and Skull and Crossbones Symbol is mandatory for any product classified in category I for systemic routes of exposure (i.e. oral, dermal, and/or inhalation. POISON must appear in red on a background of a distinctly contrasting color. Skull and Crossbones must appear near the Signal Word, DANGER. You need to relocate the POISON and Skull/Crossbones to appear above the "Precautionary Statements" heading on page 1.

Revise the Precautionary Statements to be in agreement with the toxicology profile cited above by stating the following:

Fatal if inhaled. Corrosive Causes irreversible eye damage and skin burns. Do not breathe vapor, spray, or mist. Do not get on in eyes, on skin, or on clothes. Wear protective eyewear (goggles or face shield), protective clothing, and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. The following PPE is consistent with a closed system being used, handlers must be provided with all specified PPE and have additional PPE immediately available for use in an emergency; such as a spill or equipment breakdown.

Additional PPE includes, a respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefix).

2) Revise the "First Aid" statements to include "IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice." The "If Inhaled" statements must be listed first above the "If in Eyes" statements.

General Comments:

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have further questions concerning this letter, please contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Killian Swift by telephone at (703) 308-6346 or by email at swift.killian@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

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

CONCURRENCES						
SYMBOL	Enclosure: Stamped label					
SURNAME						
DATE						

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ANTIMICROBIAL DTEA

Technical Liquid

FOR MANUFACTURING USE ONLY

Active Ingredient:

2-(Decylthio) ethanamine..... 99.8%

Inert Ingredient(s): 0.2%

Total 100%

E.P.A. Reg.No. 464-620

E.P.A. Est. No. XXX-XX-XXX

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER - POISON

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JAN 20 2010

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

464-620



FATAL IF INHALED • DO NOT BREATHE VAPOR, SPRAY OR MIST • WEAR GOGGLES OR FACE SHIELD, PROTECTIVE CLOTHING, AND RUBBER GLOVES WHEN HANDLING • WHEN REDUCED PPE IS WORN BECAUSE A CLOSED SYSTEM IS BEING USED, HANDLERS MUST BE PROVIDED ALL PPE SPECIFIED AND HAVE ADDITIONAL PPE IMMEDIATELY AVAILABLE FOR USE IN AN EMERGENCY, SUCH AS A SPILL OR EQUIPMENT BREAK-DOWN • ADDITIONAL PPE INCLUDES A RESPIRATOR WITH AN ORGANIC VAPOR REMOVING CARTRIDGE WITH A PREFILTER APPROVED FOR PESTICIDES (MSHA/NIOSH APPROVAL NUMBER PREFIX TC- 23C), OR A CANISTER APPROVED FOR PESTICIDES (MSHA/NIOSH APPROVAL NUMBER PREFIX TC-14G), OR A NIOSH APPROVED RESPIRATOR WITH AN ORGANIC VAPOR (OV) CARTRIDGE OR CANISTER WITH ANY N, R, P OR HE PREFILTER) • REMOVE AND WASH CONTAMINATED CLOTHING BEFORE REUSE.

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FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • 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 Rinising 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 15-20 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 for treatment advice • Promptly drink a large quantity of milk, egg whites, or gelatin solution; if these are not available, drink large quantities of water. Avoid alcohol. • Do not induce vomiting unless told to do so by poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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>	
NOTE TO PHYSICIAN	
<p>Probable mucosal damage may contraindicate the use of gastric lavage</p>	

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, oceans, estuaries, or public waters unless this product is specifically identified and addressed in a NPDES permit. Do not discharge effluent containing this product to public sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PESTICE STORAGE AND DISPOSAL

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

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: Nonrefillable container. Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. 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.

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DIRECTIONS FOR USE

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

This pesticide may be used for the formulation of pesticide product for use in recirculating cooling water systems. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

Note: Closed metering systems only. Handlers must use a closed system that is designed by the manufacturer to prevent dermal and inhalation exposures. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that will limit drippage to no more than 2 ml per disconnect. The closed system must function properly and be used and maintained in accordance with the manufacturer's written operating instructions. Handlers must wear the personal protective equipment required on this labeling.

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:

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

TM Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow