

464-628

6/20/2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 20 2001

Ms. Rhonda-Vance-Moeser  
Registration Specialist  
THE DOW CHEMICAL COMPANY  
1803 Building  
Midland, MI 48674

Dear Ms. Vance-Moeser:

Subject: Revised Label  
**DOWICIL QK-20 ANTIMICROBIAL**  
EPA Registration Number 464-628  
Your Letter Dated March 15, 2001

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) or 4(a) when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling;

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> <li>•Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> <li>•Take off contaminated clothing.</li> <li>•Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
IF SWALLOWED	<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>"In case of emergency call toll free at (Registrant fill in )." The product container or label with you when calling a poison control center or doctor or going for treatment."</p>	
NOTE TO PHYSICIAN	

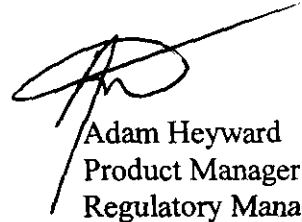
CONCURRENCES				
SYMBOL	The following statements are suggested types of information that may be included, if applicable:			
SURNAME	464-628-PL			
DATE	7/20/01			

3. The following statements are suggested types of information that may be included in the first aid statement.
  - technical information on symptomatology;
  - use of supportive treatments to maintain life functions;
  - medicine that will counteract the specific physiological effects of the pesticide;
  - company telephone number to specific medical personnel who can provide specialized medical advice.
  
4. Submit three (3) copies of your final printed labeling before you release the product for shipment

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions, please contact LaVerne Dobbins at (703) 308-6378.

Sincerely,



Adam Heyward  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510C)

Enclosure:

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DOWICIL QK-20 ANTIMICROBIAL  
FINAL DRAFT LABEL  
March 13, 2001  
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# DOWICIL\* QK-20 Antimicrobial

To control Coliform and Other Bacteria in Publicly-Owned Treatment Works; reduces microbiological contamination in equipment cleaning operations and industrial preservation applications, including both raw materials and products.

FOR INDUSTRIAL USE ONLY

**Active Ingredients:**

2,2-Dibromo-3-nitrilopropionamide . . . . . 20%

**Inert Ingredients:** . . . . . 80%

E.P.A. Registration No. 464-628

E.P.A. Est. 464-MI-1

**KEEP OUT OF REACH OF CHILDREN**

## DANGER

### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

**CORROSIVE • CAUSES IRREVERSIBLE EYE DAMAGE •  
CAUSES SKIN BURNS • MAY BE FATAL IF SWALLOWED •  
HARMFUL IF INHALED • HARMFUL IF ABSORBED THROUGH SKIN**

**Do Not Get In Eyes, on Skin, or on Clothing • Avoid Breathing Vapors •  
Wear Protective Eyewear (chemical goggles) • Wear Protective  
Clothing (faceshield, boots, apron or full-body suit; depending on operation)  
and Chemical Resistant (such as nitrile or butyl) Gloves • Wash Thoroughly  
With Soap and Water After Handling and Before Eating, Drinking, or Using Tobacco •  
Remove Contaminated Clothing and Wash Clothing Before Reuse**

**FIRST AID:** In case of eye contact, immediately flush eyes with plenty of water for at least 15 minutes. Get medical attention. In case of skin contact, immediately wash skin with soap and plenty of water. Get medical attention if irritation persists. If swallowed, Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated:**

**JUN 20 2001**

\* Trademark of The Dow Chemical Company

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 464-628

#### ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. 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.

In case of an emergency endangering life or property involving this product, call collect 517-636-4400.

#### 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:** 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.

**Reuseable 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.

#### DIRECTIONS FOR USE

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

**NOTE: ADD DOWICIL QK-20 ANTIMICROBIAL SEPARATELY TO THE SYSTEM. DO NOT MIX IT WITH OTHER ADDITIVES, IN ORDER TO AVOID DECOMPOSITION OF DOWICIL QK-20 ANTIMICROBIAL DUE TO THE HIGH pH OF MANY ADDITIVE FORMULATIONS.**

#### INDUSTRIAL PRESERVATION

DOWICIL QK-20 Antimicrobial may be used to reduce microbiological contamination in raw materials and/or products such as; aqueous paints and coatings, polymers, slurries, adhesives, latex and resin emulsions, sizing, caulk, process water, and electrochemical deposition along with specialty industrial products including; inks, polishes, waxes, detergents, and cleansers.

**TO REDUCE MICROBIOLOGICAL CONTAMINATION**

Adding DOWICIL QK-20 to the material or product at concentrations ranging from 125 to 2000 ppm by weight will typically provide effective reduction. This concentration is equivalent to 14 to 224 fluid ounces DOWICIL QK-20 Antimicrobial per 1000 gallons or 107 to 1712 milliliters DOWICIL QK-20 Antimicrobial per 1000 liters. In some instances lower levels of DOWICIL QK-20 Antimicrobial may be effective. The required concentration will depend on the material being treated and the level of contamination present. Matrix effects that can impact the efficacious level of DOWICIL QK-20 are pH, organic load, exposure time and type of contamination. To determine the exact dosage for a given application you will need to test it within your system.

**EQUIPMENT CLEANING**

DOWICIL QK-20 can be used to kill microorganisms present in solution or growing on the surfaces of process equipment such as; reaction vessels, storage tanks and containers, piping and hoses. For standard cleaning of equipment, add 50 to 250 ppm by weight DOWICIL QK-20, in an aqueous solution, to process piping or equipment. Heavily fouled solutions or equipment may be treated with up to 2000 ppm of DOWICIL QK-20. After treating process equipment with the DOWICIL QK-20, allow the DOWICIL QK-20 solution to be in contact with surfaces for up to four hours. Treat process equipment at least monthly, or as often as needed.

If bleach is being used for cleaning purposes at 50 to 250 available chlorine, DOWICIL QK-20 can be used as part of a dual treatment program at 50 to 100 ppm by weight, in combination with sodium hypochlorite. Treat process equipment with chlorine first. Follow this treatment with DOWICIL QK-20. Do not combine concentrated sodium hypochlorite solution with DOWICIL QK-20.

**PUBLICLY-OWNED TREATMENT WORKS**

**TO CONTROL COLIFORM AND OTHER BACTERIA**

Add DOWICIL QK-20 Antimicrobial at a concentration of 1.0 to 10.0 ppm by weight of water being treated, depending on the severity ad contamination in the system. Addition should be CONTINUOUS and should be made with a metering pump at a point in the system where mixing will be rapid and thorough. Add DOWICIL QK-20 Antimicrobial to the system in a location where contact time will be 30 minutes or greater before reaching the outfall.

**TO USE AS A CO-TREATMENT WITH CHLORINE**

Add 0.4-1.5 ppm DOWICIL QK-20 Antimicrobial by weight of water treated. Chlorination should result in a minimum detectable residual (i.e., greater than zero but less than the NPDES permit level). Addition should be CONTINUOUS and made at a point just after initial chlorine mixing. Rapid mixing is necessary for maximum effectiveness. DOWICIL QK-20 Antimicrobial should be added at a location where a contact time of 10 minutes or longer will be provided before reaching the outfall.

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DOWICIL QK-20 ANTIMICROBIAL  
FINAL DRAFT LABEL  
March 13, 2001  
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NOTICE: Seller warrants that the product conforms to its chemical description as contained on this label and is reasonably fit for the purposes stated on this label (except uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration) when used in accordance with directions under normal conditions of use. THE WARRANTIES MADE IN THIS PARAGRAPH ARE SELLER'S SOLE WARRANTIES WITH RESPECT TO THE PRODUCT AND ARE MADE EXPRESSLY IN LIEU OF AND EXCLUDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIONS AND WARRANTIES.

**NOTICE**

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

**THE DOW CHEMICAL COMPANY**  
**Midland, Michigan 48674**  
**1-800-258-CHEM**

**\*Trademark of THE DOW CHEMICAL COMPANY**

