



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 30, 2004

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

Subject: Notification Application Per PR Notice 98-10
Dowicil * QK-20 Antimicrobial
EPA Registration No. 464-628
Application Dated March 1, 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 Notification:

- Revised storage and disposal statement

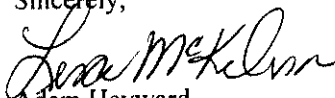
General Comment:

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, or Lisa McKelvin at (703) 308-7496.

Sincerely,


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

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Please read instructions on reverse before completing form.

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



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 464-628	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow Chemical / DOWICIL* QK-20 Antimicrobial	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 _____	NOTIFICATION Date Reviewed: 3-30-04 Reviewed By: L. Moore/VM
<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:				2. Type of Container	
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		<input checked="" type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container	<input checked="" type="checkbox"/> Glass	<input type="checkbox"/> Paper
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
Certification 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 March 1, 2004	



The Dow Chemical Company
Midland, Michigan 48674

1803 Building
March 1, 2004

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 - DOWICIL* QK-20 ANTIMICROBIAL
EPA REG. NO. 464-628

NOTIFICATION
Date Reviewed: 3-30-04
Reviewed By: L. McRee/ujw

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

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

*Trademark of The Dow Chemical Company

Enclosures

DOWICIL* QK-20 Antimicrobial

Reduces microbial contamination in process water, raw materials and formulated consumer, institutional and industrial products. Reduces microbial contamination in wastewater and equipment cleaning operations.

Active Ingredient(s):
2,2-Dibromo-3-nitriopropionamide20%
Inert Ingredient(s):80%
Total 100%

E.P.A. Registration No. 464-628
E.P.A. Est. 464-MI-1

KEEP OUT OF REACH OF CHILDREN

DANGER

Precautionary Statement
Hazards to Humans & Domestic Animals
DANGER

Corrosive. Causes irreversible eye damage or skin burns. Do not get in eyes, on skin or on clothing. May cause loss of vision. Fatal if absorbed through skin. Harmful if swallowed or inhaled. Avoid breathing vapor. Wear goggles or face shield (safety glasses). Wear protective clothing (long-sleeve shirt and long pants, socks plus shoes and chemical resistant gloves such as waterproof gloves.) Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:
Coveralls, over long-sleeved shirt and long pants
-socks and chemical resistant footwear
-goggles or face shields
-Chemical-resistant gloves (such as barrier, laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, viton)
-For filling/loading: wear a chemical resistant apron.
Follow manufacturers' instructions for cleaning & maintaining PPE
If no such instructions exist for washables, use detergent and hot water.
Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must wash hands before eating, drinking, chewing gum, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after using this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly.

General Precautions and Restrictions

Do not apply this product directly in a way that will contact workers or others persons

NOTIFICATION

Date Reviewed: 3-20-04
Reviewed By: [Signature]



THE DOW CHEMICAL COMPANY

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

* Trademark of THE DOW CHEMICAL COMPANY

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 rinsing eye. • Call a 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 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	
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.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

ENVIRONMENTAL HAZARDS

This pesticide is toxic or highly 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 Regional Office of the EPA.

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.

NOTICE

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



NOTICE

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

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.

Process, Product & Wastewater Clean Up

DOWICIL QK-20 Antimicrobial may be used to reduce microbial contamination in process water and raw materials during the formulating phase, or it can be added directly to the final formulated product to reduce microbial contamination prior to packaging. DOWICIL QK-20 Antimicrobial may also be used for treatment of wastewater prior to discharge to a public-owned treatment works. The required concentration will depend upon the exposure load and time and matrix effects that impact efficacy of the biocide. You will need to determine the optimum level to use for your system or product within the guidelines given below. Do not use at greater than recommended levels.

Consumer, Household & Institutional Processes & Products

DOWICIL QK-20 Antimicrobial is not intended for use in personal care products.

PROCESS WATER & RAW MATERIAL CLEAN UP

To reduce microbial contamination in process water or raw materials used to make consumer, household or institutional products, add DOWICIL QK-20 Antimicrobial directly to the water or raw material at a concentration of 125-1,000 ppm by weight.

DIRECT PRODUCT ADDITION

To reduce microbial contamination in formulated products such as hard surface cleaners, laundry detergent, fabric softeners and other water based formulations, add 125-250 ppm by weight DOWICIL QK-20 Antimicrobial directly to the product prior to packaging. Through mixing is recommended.

Industrial Processes & Products

PROCESS WATER & RAW MATERIAL CLEAN UP

To reduce microbial contamination in process water or raw materials used to make industrial products, add DOWICIL QK-20 Antimicrobial directly to the process water or raw material at a concentration of 125-2,000 ppm by weight. This includes raw materials and/or products such as aqueous paints and coatings, polymers, slurries, adhesives, latex and resin emulsions and surfactants.

DIRECT PRODUCT ADDITION

To clean up microbial contamination in a final formulated industrial product, add 125-500 ppm by weight DOWICIL QK-20 Antimicrobial directly to the product prior to packaging.

Industrial Wastewater DOWICIL QK-20 Antimicrobial sludge at Add 125-500 ppm 107-1,712

Not DOWICIL or growing storage to equipment solution, to equipment After treat DOWICIL If bleach is DOWICIL program a Treat proc DOWICIL hypochlorite