

464-628



2-5-2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

February 5, 2008

Rhonda Vance-Moeser  
Senior Regulatory Specialist  
**The Dow Chemical Company**  
574 Building, Office 2044  
Midland, MI 48667

Subject: **Dowicil QK-20 Antimicrobial**  
EPA Registration No. 464-628  
Application Dated: January 14, 2008  
Receipt Date: January 16, 2008

Dear Ms. Vance-Moeser:

The following amendment, submitted in connection with registration under section of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable.

**Proposed Amendment:**

- Updated labeling

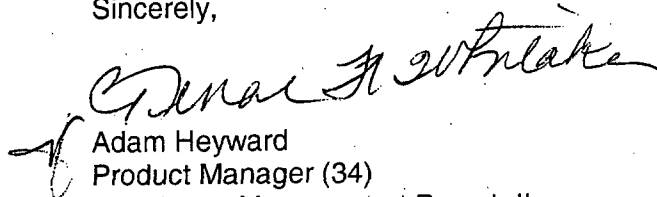
**Other comments:**

A stamped copy of the accepted labeling is enclosed.

The Agency is moving away from review of paper submitted registration applications to electronic review of applications. Therefore, we need your help to make this an efficient and convenient process for both you and the Antimicrobials Division. Accordingly, we are asking you to submit future labeling amendments for this product via the electronic labeling process. Refer to the following website for guidance on electronic submissions, including label: [http://www.epa.gov/oppfead1/eds/esr\\_guidance.htm#overallsub](http://www.epa.gov/oppfead1/eds/esr_guidance.htm#overallsub). If you have questions concerning electronic labeling, a list of contacts is available at the following site: <http://www.epa.gov/oppfead1/eds/edsgoals.htm#contacts>

Should you have any questions concerning this letter, please contact me by telephone at (703) 308-6422 or email address at: [heyward.adam@epa.gov](mailto:heyward.adam@epa.gov), or Renae Whitaker telephone at (703) 308-7003 or email address at: [whitaker.renae@epa.gov](mailto:whitaker.renae@epa.gov) during the hours of 8:00 am to 3:30 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



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

Enclosure: EPA stamped approved labeling

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## DOWICIL™ QK-20 Antimicrobial

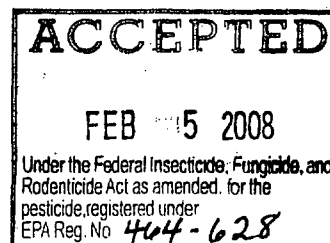
Reduces microbial contamination in process water, raw materials and formulated consumer, institutional and industrial products. Reduces microbial contamination in wastewater, recycled process water, recycled products, recycled wastewater, equipment cleaning and electrodeposition systems.

**Active Ingredient:**

2,2-Dibromo-3-nitropropionamide ..... 20%  
Inert Ingredients: ..... 80%  
Total 100%

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

E.P.A. Est. XXX-XX-XX



### KEEP OUT OF REACH OF CHILDREN

### DANGER

#### PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

### DANGER

Corrosive. Causes irreversible eye damage • Causes skin Burns • Harmful if swallowed or absorbed through skin • Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals • Harmful if inhaled • Avoid breathing vapor or mist • Wear goggles, face shield or safety glasses • Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet • Remove and wash contaminated clothing 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 mixing/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 handling 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.

<b>FIRST AID</b>	
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 30 minutes</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye</li> <li>• Obtain prompt medical treatment, preferably from an ophthalmologist.</li> </ul>
<b>IF ON SKIN OR CLOTHING</b>	<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>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Call a 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>
<b>IF INHALED</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible</li> <li>• Call a poison control center or doctor for further treatment advice</li> </ul>
<b>HOT LINE NUMBER</b>	
<p><b>IN CASE OF AN EMERGENCY</b> endangering life or property involving this product, call collect (989) 636-4400. Have product container or label with you when calling a poison control center or doctor or going for treatment.</p>	
<b>NOTE TO PHYSICIAN</b>	
<p>Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

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### ENVIRONMENTAL HAZARDS

This product 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 State Water Board or 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.

*Following statement to appear on label when reusable portable containers are used:*

**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 or their designate.

### NOTICE



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

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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.

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

### **Process, Product, Wastewater & Recycle 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, recycled process water and materials or recycled wastewater. The required concentration will depend upon the material being treated and the contamination load. Organic load, pH, exposure load and time are 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.

### **Consumer, Household & Institutional Recycle Water, Recycle Product Clean Up & Recycle Wastewater**

DOWICIL QK-20 Antimicrobial may be added to recycle process water, a recycle product stream or added to a recycle waste water stream to reduce microbial contamination. Add at a convenient point of uniform mixing. This can be either

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continuous feed directly into a transfer line or slug fed to the storage container for either wash water or product. Add 125 to 1000 ppm by weight. This concentration is equivalent to 38 to 303 ml (1.28 to 10.2 fluid oz) DOWICIL QK-20 Antimicrobial per 100 gallons to be treated.

### **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 Recycle Water, Recycle Product Clean Up & Recycle Wastewater**

DOWICIL QK-20 Antimicrobial may be added to recycle process water, a recycle product stream or added to a recycle waste water stream to reduce microbial contamination. Add at a convenient point of uniform mixing. This can be either continuous feed directly into a transfer line or slug fed to the storage container for either wash water or product. Add 125 to 2000 ppm by weight. This concentration is equivalent to 38 to 606 ml (1.28 to 20.4 fluid oz) DOWICIL QK-20 Antimicrobial per 100 gallons to be treated.

## **Industrial Wastewater Systems**

### **Wastewater Systems, Wastewater Sludge and Wastewater Holding Tanks**

#### **Not Registered For This Use In The State Of California**

DOWICIL QK-20 Antimicrobial may be added to a wastewater system or sludge at a convenient point of uniform mixing such as the digester. Add 125-2,000 ppm by weight. This concentration is equivalent to 378-6054 milliliters (12.8 - 204.7 fluid oz) DOWICIL QK-20 Antimicrobial per 1,000 gallons of water.

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## Tankside Addition to Electrodeposition Systems

### Not Registered For This Use In The State Of California

DOWICIL QK-20 Antimicrobial may be added as a tankside additive in recirculating electrodeposition systems and associated rinse systems to control microbial contamination. DOWICIL QK-20 Antimicrobial should be added into the recirculating rinse system, ultra filter permeate, or final distilled rinse system at a point to insure uniform mixing. Add 125 – 2000 ppm by weight. This concentration is equivalent to 378 – 6054 milliliters (12.8 – 204.7 fluid oz) of DOWICIL QK-20 Antimicrobial per 1000 gallons of water.

## Equipment Cleaning

### Not registered for this use in the State of California

DOWICIL QK-20 Antimicrobial 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 Antimicrobial 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 Antimicrobial. After treating process equipment with the DOWICIL QK-20 Antimicrobial, allow the DOWICIL QK-20 Antimicrobial solution to be in contact with surfaces for up to four hours.

If bleach is being used for cleaning purposes at 50 to 250 ppm available chlorine, DOWICIL QK-20 Antimicrobial 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 Antimicrobial. Do not combine concentrated sodium hypochlorite solution with DOWICIL QK-20 Antimicrobial.

**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, subject to the inherent risks set forth below. 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 – *When product produced by contract manufacturer*

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

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