

464-628

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JUN 15 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Subject: **DOWICIL™ QK-20 Antimicrobial**
EPA Registration No. 464-628
Application Date: March 16, 2009
Receipt Date: March 17, 2009

Dear Ms. Vance-Moeser:

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

Proposed Amendment:

- Revised labeling per Agency's letter dated December 12, 2008
- Revised Storage and Handling per PR Notice 2007-4

Reorder the First Aid Statement to read as follows:

IF IN EYES
IF ON SKIN OR CLOTHING
IF SWALLOWED
IF INHALED

General Comment:

A stamped copy of the accepted label with comments has been inserted in your file for future reference. Submit one copy of your final printed label distributing or selling the product bearing the revised labeling.

Should you have any questions concerning this letter, you may contact me by telephone at (703) 308-6415 or by e-mail at lantz.tracy@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by email at grigsby.stacey@epamail.epa.gov during the hours of 8:00 am to 4:00 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,

Stacey Grigsby
Tracy Lantz
(Acting) Product Manager (34)

Regulatory Management Branch II
Antimicrobials Division (7510P)

SYMBOL						
SURNAME						
DATE						

Enclosure: Stamped Label

2008

DOWICIL QK-20 ANTIMICROBIAL
FINAL MASTER LABEL
March, 2009

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-nitrilopropionamide	20%
Inert Ingredients:	80%
	Total 100%

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

JUN 15 2009

E.P.A. Registration No. 464-628
E.P.A. Est. No. XXX-XX-XX

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

KEEP OUT OF REACH OF CHILDREN

DANGER

**Precautionary Statements
Hazards To Humans and Domestic Animals
DANGER**

CORROSIVE: Causes irreversible eye damage • May be Fatal if swallowed • Causes skin irritation • Harmful if inhaled or absorbed through skin • Do not get in eyes, on skin or on clothing • Avoid breathing spray or mist • When loading or handling wear protective eyewear (goggles or face shield) Wear long-sleeved shirt and long pants, socks, shoes and chemically resistant gloves • Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals • Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco • Remove and wash contaminated clothing separately before reuse.

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Personal Protective Equipment

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 nitrile/neoprene rubber, PVC or viton)

Engineering Controls

When handlers use closed metering systems the handler requirements may be reduced or modified to long-sleeve shirt, long pants, shoes and socks.

User Safety Requirements

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 the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing

Application Restrictions

Do not apply this product directly in a way that will contact workers or others persons either directly or through drift. Only protected handlers may be in the area during application.

DOWICIL QK-20 ANTIMICROBIAL
 FINAL MASTER LABEL
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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 rinsing eye • Obtain prompt medical treatment, preferably from an ophthalmologist.
IF INHALED	<ul style="list-style-type: none"> • 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
IF SWALLOWED	<ul style="list-style-type: none"> • Call a 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.
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.
Have product container or label with you when calling a poison control center or doctor or going for treatment.	
HOT LINE NUMBER	
IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect (989) 636-4400.	
NOTE TO PHYSICIAN	
If lavage is performed, suggest endotracheal and/or esophageal control. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach. The decision of whether to induce vomiting or not should be made by a physician. Chemical eye burns may require extended irrigation. Obtain prompt consultation, preferably from an ophthalmologist. If burn is present, treat as any thermal burn, after decontamination. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.	

ENVIRONMENTAL HAZARDS

This pesticide 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. 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.

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STORAGE AND DISPOSAL

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

Storage: To maintain product quality, store at temperatures below 35°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

Option to use for labels on nonrefillable rigid containers of all sizes

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.

Option to use for labels on refillable rigid tote containers

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning of the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean container before final disposal, empty contents into application equipment and triple rinse. Pour or pump rinsate into application equipment or rinsate collection system. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed 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 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.

DOWICIL QK-20 ANTIMICROBIAL
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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 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.

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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.

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

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DOWICIL QK-20 ANTIMICROBIAL
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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. 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:
Lot:

Produced For (*used when manufactured by contract manufacturer*)

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