

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

NOV - 2 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

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

Subject:

DOWICIL™ QK-20 Antimicrobial

EPA Registration No.: 464-628 Application Date: October 5, 2011 Receipt Date: October 7, 2011

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: Delete Qualifier Statement: "Product no registered for this use in California" to the Equipment Cleaning use site.

General Comment:

Based on a review of the material submitted, your notification to update as referenced above is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at grigsby.stacey@epa.gov during the hours of 8:00am to 4:00pm EST. 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 Product Manager (34)

Regulatory Management Branch II Antimicrobials Division (7510P)

United States Environmental Protection Age Washington, DC 20460	ency	×	Registrati Amendm Other	William Co.	OPP Identifier Number	
Application for	Pesticide - Sec	tion				
. Company/Product Number 464-628	2. EPA Product Manager J. Campbell-McFarlane		3. P		Proposed Classification	
- Company/Product (Name) The Dow Chemical Company/ DOWICIL QK 20 Antimicrobial	PM# 34			X None Restricted		
The Dow Chemical Company 1803 Building Midland, MI 48674 Check if this is a new address	(b)(i), my product to:	is sim			FIFRA Section 3(c)(3) nposition and labeling	
Sec	ction - II					
Amendment - Explain below. Resubmission in response to Agency letter dated X Notification - Explain below.	Final printe Agency let "Me Too" Other - Exp	ter date Applica	tion.	to		
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The Dow Chemical Company Midland, MI 48674 U.S.A.

October 5, 2011

Office of Pesticide Programs (7504P)
Document Processing Desk (NOTIF)
U. S. Environmental Protection Agency
One Potomac Yard, Room S-4900
2777 S. Crystal Drive
Arlington, Virginia 22202-4501

Overnight Mail

RE: NOTIFICATION -DOWICIL™ QK-20 Antimicrobial - EPA REG. NO. 464 - 628

Dear Ms. Campbell-McFarlane,

The Dow Chemical Company (Dow) hereby submits a label Notification to the registration of DOWICIL QK-20 Antimicrobial, EPA REG. NO. 464 – 628. This Notification *removes* the qualifier, "Product not registered for this use in California" to the Equipment Cleaning use site.

In order for the application to be processed the required Notification statement is included below.

"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 labeling or the confidential statement of formula of this product. I understand that it is 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 enforcement action and penalties under section 12 and 14 of FIFRA"

Enclosed are the following documents to support this notification

1) Completed application for Pesticide Registration, Form 8570-1.

2) Required notification statement above.

3) One copy of the label with change highlighted

4) Two copies of the final label

Please contact me if you have any questions or need additional information.

Sincerely,

Rhanda Vance- Maser

Rhonda Vance-Moeser Product Stewardship Regulatory Manager Larkin Laboratory, 1691 N. Swede Road Midland, MI 48674

Phone: (989) 636-1884

e-mail: rgvmoeser@dow.com

Enclosures

TMTrademark of the Dow Chemical Company ("Dow") or an affiliated company of Dow

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.

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 other persons, either directly or through drift. Only protected handlers may be in the area during application.

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.

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 Disposar:

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 labelinstructions, 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 nonrefillably rigid containers of all sizes.

Nonrefillable container. Do not reuse of refill this container. Triple rinse or pressure rinse container (or equinalent) 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 revillable 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.

DOWICILTM QK-20

Reduces microbial contamination in process water, raw material industrial products. Reduces microbial contamination in wastewat recycled wastewater, equipment cleaning and electrodeposition sys

Active	Ingredien	t
	g. calon	

2,2	-Dibromo-3-ni	trilopropionamide	
Inert I	ngredient(s):	,	
Total			

	FIRST AID
IF IN EYES	•Hold eye open and rinse slowly and gently with water for •Remove contact lenses, if present, after the first 5 minutes •Obtain prompt medical treatment, preferably from an ophth
IF ON SKIN OR CLOTHING	•Take off contaminated clothing. •Rinse skin immediately with plenty of water for 15–20 mine •Call a poison control center or doctor for treatment advice.
IF SWALLOWED	Call a poison control center or doctor immediately for treate Have a person sip a glass of water if able to swallow On not induce vomiting unless told by the poison control ce
IF INHALED	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then possible. Call a poison control center or doctor for further treatment

Have product container or label with you when calling a poison control center c

HOT LINE NUMBER

IN CASE OF AN EMERGENCY endangering life or property involving this produc

NOTE TO PHYSICIA!

If lavage is performed, suggest endotracheal and/or esophageal control. Da toxicity when considering emptying the stomach. The decision of whether physician. Chemical eye burns may require extended irrigation. Obtain promp burn is present, treat as any thermal burn, after decontamination. No specific ϵ the control of symptoms and the clinical condition of the patient.

Produced For



THE DOW CHEMICAL COMPANY

Midland, Michigan 48674

989-636-4400

^{® TM} Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

NET CONTENTS: 49 gallons NET WEIGHT: 500 lb / 227 kg LOT NO:

OWICIL™ 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.

Antimicrobial

NOTE: ADI

Process, Pro

DOWICIL QK formulating p packaging. D materials or contamination will need to d greater than r

Consumer, H

DOWICIL QK

PROCESS W To reduce mi products, add weight.

DIRECT PRO To reduce mis and other wa to packaging.

Consumer, F

DOWICIL QK waste water continuous fe 1000 ppm by per 100 gallor

Industrial Pr

PROCESS W To reduce mi Antimicrobial materials and and surfactar

DIRECT PRO To clean up i Antimicrobial

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DOWICIL QF waste water continuous fe 2000 ppm by per 100 galloi

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Wastewater

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Tankside Ad

Not Register DOWICIL O associated r recirculating 2,000 ppm b Antimicrobial

Equipment (

DOWICIL QF equipment si add 50 to 25 fouled solution equipment w surfaces for

If bleach is t used as part process equ concentrated

Notice: Sell purposes sta IMPLIED W EXPRESS C

Active Ingredient:

2,2-Dibromo-3-nitrilopropionamide 20% Inert Ingredient(s): -80% 100%

	FIRST AID
IF IN EYES	•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 ON SKIN OR CLOTHING	•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	Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow On not induce vomiting unless told by the poison control center or doctor
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.

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.

> E.P.A. Registration No. 464-628 E.P.A. Est. 83434-IL-001

Pleviewed By:

Produced For



THE DOW CHEMICAL COMPANY

Midland, Michigan 48674

989-636-4400

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

NET CONTENTS: 49 gallons NET WEIGHT: 500 lb / 227 kg

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collect (989)636-4400.

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> E.P.A. Registration No. 464-628 E.P.A. Est. 83434-IL-001

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. Thorough 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. 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 insurauniform mixing. 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.

Equipment Cleaning

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.

HIGHLIGHTED CHANGE

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.