4.64-632

9/23/2002

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

> OFFICE OF PREVENTION. PESTICIDES AND TOXIC SUBSTANCES

September 23, 2002

Ms. Rhonda Vance-Moeser Senior Regulatory Specialist **The Dow Chemical Company** 2030 Dow Center Midland, MI 48674

Subject: Clarification of Product Name Change SUMP BUDDY MWF EPA Registration Number 464-632 Fax Letter Receipt Date: August 29, 2002

Dear Ms. Vance -Moeser:

This letter is to clarify the Agency's letter of September 23, 1998 (your application of 08/26/98) with respect to your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9, requesting that the primary brand name of the subject product being changed from Dow Time-Release Antimicrobial MWF to *"SUMP BUDDY MWF"* and to designate Dow Time-Release Antimicrobial MWF as the alternate brand name.

The primary brand name change to "SUMP BUDDY MWF" and the alternate brand name "Dow Time-Release Antimicrobial MWF" is acceptable. Copies have been inserted in your file for future reference.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with comment:

1. In accordance with PR Notice 2001-1, the heading and first aid statements must be revised to read:

FIRST AID

IF IN EYES: Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

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.

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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. Do not induce vomiting unless told by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

2. Add the word "Pesticides" prior to the word Storage under the heading Storage and Disposal.

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product.

Should you have any questions concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,

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

Enclosure

SUMP BUDDY* MWF Antimicrobial Time-Release Tablets

in Water-Soluble Bags

Controls bacteria and fungi in use dilutions of cutting, grinding, and other water-based metalworking fluids.

FOR INDUSTRIAL USE ONLY

Active Ingredient:

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2,2-Dibromo-3-nitrilopropionamide	.40%
inert Ingredient(s):	<u>60%</u>
Total	00%
E.P.A. Registration No. 464-632	
E.P.A. Est. 464-MI-1; 33967-NJ-1	

EEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals



THE DOW CHEMICAL COMPANY

Midland, Michigan 48674 U.S.A. 1-800-258-CHEM * Trademark of THE DOW CHEMICAL COMPANY

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CORROSIVE · CAUSES IRREVERSIBLE EYE DAMAGE · HARMFUL IF SWALLOWED OR ABSORBED THROUGH SKIN

Do Not Get In Eyes, On Skin, Or On Clothing • Avoid Contact With Skin • Wear Goggles Or Face Shield • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reaction in Some Individuals. • Wash Thoroughly With Soap And Water After Handling • Remove Contaminated Clothing and Wash Before Reuse

STATEMENTS OF PRACTICAL TREATMENT:

In case of eye contact, hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention. In case of skin contact, wash with plenty of scap and water. Get medical attention.

If swallowed, call a physician or Poison Control Center. Do not induce vorniting. Drink promptly large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Net Contents: 25 Tablets NET WT: 5 kg/11.023 lb

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. 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 35°C. Keep tablets in closed container when not in use.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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. Dispose of container in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Notice: descript purpose accepte has sub direction IN THIS RESPE OF ANU MERCH PURPO REPRE

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APPRO) of SUMF gallons (control.



ACCEPTED with COMMENTS EPA Letter Dated: SEP 2 3 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 464 - 632

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