

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

October 11, 2006

Maureen Mikszal  
Senior Regulatory Specialist  
The Dow Chemical Company  
1803 Building  
Midland, MI 48674

Subject: Amical WP Antimicrobial Agent  
EPA Registration No.: 464-672  
Application Date: September 11, 2006  
Receipt Date: September 12, 2006

Dear Ms. Mikszal,

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

**Proposed Notification**

- Add the phrase "Produced for" to label.

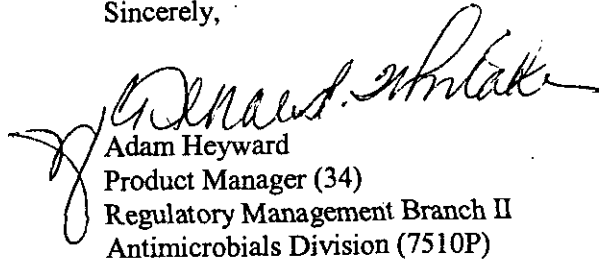
**General Comments**

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.

Sincerely,



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

CONCURRENCES							
YMBOL	750P						
JRNAME	Graham						
DATE	10/11/06						

286



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 464-672	2. EPA Product Manager A. Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) AMICAL WP Antimicrobial Agent	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) The Dow Chemical Company 1803 Building Midland, MI 48674 <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 _____
<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.)

The Dow Chemical Company is submitting a notification to update the label to clarify that Dow is not the producer. The text, "produced for:" has been added to the label. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 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 a violation of 18U.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 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 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 type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 15 gallon	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 <input type="checkbox"/> 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 Maureen Miksztal	Title Senior Regulatory Specialist	Telephone No. (Include Area Code) 732-563-5586
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>Maureen Miksztal</i>	3. Title Senior Regulatory Specialist	
4. Typed Name Maureen Miksztal	5. Date 9/8/06	



3 8 6

September 11, 2006

The Dow Chemical Company  
171 River Road  
Piscataway, NJ 08854  
USA

**Overnight Delivery**

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

Subject: AMICAL™ WP Antimicrobial Agent EPA Reg. No. 464-672  
**Notification of Minor Label Change**

Dear Sir/Madam:

Per PR Notice 98-10, The Dow Chemical Company is submitting a notification to the registration for AMICAL™ WP Antimicrobial Agent EPA Reg. No. 464-672. Please find enclosed the following documentation in support of this application:

- Application Form, EPA Form 8570-1
- Draft label with highlighted change

Please contact me at 732-563-5586 with questions or comments regarding this submission. Thank you for your assistance.

Sincerely,

Maureen Mikszal  
Senior Regulatory Specialist

cc: Mr. Adam Heyward, PM-34

Enclosure

4 8 6

# AMICAL™ WP Antimicro

**Active Ingredient(s):**

Diiodomethyl p-tolyl sulfone . . . . . 48.45% (w/w)

**Inert Ingredient(s):**

Related Compounds & Carriers . . . 51.55% (w/w)  
TOTAL 100%

E.P.A. Registration No. 464-672

E.P.A. Est. 37429-GA-2

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**DANGER. Corrosive. Causes irreversible eye damage. Harmful if absorbed through the skin.**

**Do Not Get In Eyes, On Skin, Or On Clothing · Wear Goggles, Face Shield, or Safety Glasses · Wash Thoroughly With Soap And Water After Handling · Remove Contaminated Clothing and Wash Clothing Before Reuse**

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish. Do not contaminate water when disposing of equipment washwaters. 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.

Produced for:



**THE DOW CHEMICAL COMPANY**

Midland, Michigan 48674 U.S.A.

(989)636-4400

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

Made in U.S.A.

76917-9/5/2006-1874

FIRST AID:	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eyes open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first five minutes, then continue rinsing.</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 by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN:</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.</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.</li> </ul>
HOT LINE NUMBER	
<b>IN CASE OF AN EMERGENCY</b> endangering life or property involving this product. Have the product container or label with you when calling a poison control center or doctor.	
<b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may preclude the use of gastric lavage.	

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store in a dry area. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinseate 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:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

**USE IN PAINTS**

AMICAL WP Antimicrobial Agent algicide for exterior and interior fire-retardant insulation coating a paint and duct coating will vary expected severity of field condition. Antimicrobial Agent will impart protection between 4.0-10.2 lb AMICAL WP of paint for severe situations with Antimicrobial Agent per 100 gal severe conditions. AMICAL WP during the last few minutes of the dispersion. For mildew control of WP Antimicrobial Agent at 0.02 to ensure sufficient mixing with other ingredients.

**USE IN PIGMENT DISPERSIONS, EXTENDER SLURRIES**

To inhibit the growth of spoilage suspension and dispersions. Antimicrobial Agent when dosed at Antimicrobial Agent at a point in sufficient mixing will assure good ingredients are added.

**USE IN ADHESIVES, CAULK**

AMICAL WP Antimicrobial Agent adhesives and binders e.g., joint paste, carpet backing, air filter where mildew growth on the application problem. For control of mildew growth Antimicrobial Agent at a point in sufficient mixing will assure good ingredients are added.

# WP Antimicrobial Agent

FIRST AID:	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eyes open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first five minutes, then continue rinsing eyes.</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 by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN:</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.</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, preferable mouth to mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment.</li> </ul>
HOT LINE NUMBER	
<b>IN CASE OF AN EMERGENCY</b> endangering life or property involving this product, call <b>1-800-424-9300</b> . Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
<b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may preclude the use of gastric lavage.	

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store in a dry area. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinseate 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:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

**USE IN PAINTS**

AMICAL WP Antimicrobial Agent is an effective mildewcide and algicide for exterior and interior latex paints, solvent-based paints, fire-retardant insulation coating and air duct coatings. Use levels in paint and duct coating will vary depending upon the formulation and expected severity of field conditions. Generally, AMICAL WP Antimicrobial Agent will impart protection when used at levels of between 4.0-10.2 lb AMICAL WP Antimicrobial Agent per 100 gallons of paint for severe situations while 3.0-6.1 lb AMICAL WP Antimicrobial Agent per 100 gallons of paint are sufficient for less severe conditions. AMICAL WP Antimicrobial Agent should be added during the last few minutes of the pigment grind for maximum dispersion. For mildew control on fire-retardant coating add AMICAL WP Antimicrobial Agent at 0.02 to 0.61% at point in production process to ensure sufficient mixing with other dry ingredients.

**USE IN PIGMENT DISPERSIONS, INKS, EMULSION AND EXTENDER SLURRIES**

To inhibit the growth of spoilage fungi during storage of water-based suspension and dispersions. AMICAL WP Antimicrobial Agent will impart protection when dosed at 0.1-0.31% (w/w). Add AMICAL WP Antimicrobial Agent at a point in the production process where sufficient mixing will assure good suspension of the material as other ingredients are added.

**USE IN ADHESIVES, CAULKS AND SEALANTS**

AMICAL WP Antimicrobial Agent is recommended for use in adhesives and binders e.g., joint compounds, tile mastics, wallpaper paste, carpet backing, air filter adhesive and sealants and caulks where mildew growth on the applied or stored product may be a problem. For control of mildew growth add 0.04-0.61% AMICAL WP Antimicrobial Agent at a point in the production process where sufficient mixing will assure good suspension of the material as other ingredients are added.

**USE IN LEATHER TANNING**

AMICAL WP Antimicrobial Agent is vegetable tanned leather from mold wet processing and for protecting w long transportation times. For norm cattle hides (based on white weight) sheep hides (based on drained pickd goat and small skins use levels shd basis of the skin weight, assuming li and pickled weight to be 33% dry b protection is required, use 0.04-0.08 sheep, and on goat and small skins normal protection. Use level recom retan/color/fatliquor protection of chr types are 0.2-0.61 (% on wet blue w the dry AMICAL WP Antimicrobial A preferably by sprinkling across the v be done just prior to chrome additio formate is added dry prior to chrom retan/color/fatliquor, add AMICAL V the prime fatliquor feed.

**USE IN WOOD PRESERVATION ONLY)**

AMICAL WP Antimicrobial Agent ca sapstain, and wood rotting organisr Antimicrobial Agent into appropriate stain and decay. AMICAL WP Anth either aqueous or solvents-based sy from 0.61%-2.0% (w/w). Solvent-b; mineral spirits require a suitable co-AMICAL WP Antimicrobial Agent int responsible for obtaining EPA regist

**USE IN METALWORKING FLUID**

AMICAL WP Antimicrobial Agent is metalworking fluids and lubricants t level of AMICAL WP Antimicrobial A metalworking fluid concentrate will v factor recommended by the manufe activity, a concentration 204 to 612 Antimicrobial Agent in the diluted flui Antimicrobial Agent should be dissol prior to addition to the metalworking

**USE IN RUBBER AND PLASTIC**

AMICAL WP Antimicrobial Agent is polyurethane, rubber, thermoplastic polymeric-based products, coating, requiring protection against microbi microbial deterioration use 0.2-1.6% Agent based upon total weight of so WP Antimicrobial Agent can be inco any convenient state of the manufac

**USE IN TEXTILES AND NON-WC**

To prevent mildew growth on produ cordage, drapes, filters, and shower upon the expected severity of expos general 1.0-10.2 lb of AMICAL WP , of rlv fabric (1020-10,200 ppm) is n Antimicrobial Agent is best added to emulsion o- dye to ensure durability

# ocial Agent

eyes.

call 1-800-424-9300.  
for or going for treatment.

ivage.

an effective mildewcide and  
paints, solvent-based paints,  
air duct coatings. Use levels in  
according upon the formulation and  
Generally, AMICAL WP  
when used at levels of  
Antmicrobial Agent per 100 gallons  
0.0-6.1 lb AMICAL WP  
of paint are sufficient for less  
Antmicrobial Agent should be added  
ment grind for maximum  
e-retardant coating add AMICAL  
51% at point in production process  
dry ingredients.

## 3, INKS, EMULSION AND

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AL WP Antmicrobial Agent will  
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production process where  
suspension of the material as other

## AND SEALANTS

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sive and sealants and caulks  
or stored product may be a  
th add 0.04-0.61% AMICAL WP  
production process where  
suspension of the material as other

## USE IN LEATHER TANNING

AMICAL WP Antmicrobial Agent is used in protecting chrome or vegetable tanned leather from mold and mildew during in-tannery wet processing and for protecting wet-blue during long storage and long transportation times. For normal protection of chrome-tanned cattle hides (based on white weight of hides) use 0.02-0.04%, for sheep hides (based on drained pickle weight) 0.1-0.16%, and for goat and small skins use levels should be calculated on the dry basis of the skin weight, assuming limed weight to be 20% dry basis and pickled weight to be 33% dry basis. When long hold or export protection is required, use 0.04-0.08% for cattle, 0.16-0.31% for sheep, and on goat and small skins follow recommendations for normal protection. Use level recommendations during retan/color/fatliquor protection of chrome-tanned hides for all hide types are 0.2-0.61% (% on wet blue weight). In all applications, add the dry AMICAL WP Antmicrobial Agent through the drum door, preferably by sprinkling across the width of the drum. This should be done just prior to chrome addition, or together with the formate, if formate is added dry prior to chrome. In the case of retan/color/fatliquor, add AMICAL WP Antmicrobial Agent prior to the prime fatliquor feed.

## USE IN WOOD PRESERVATION (FOR FORMULATING USE ONLY)

AMICAL WP Antmicrobial Agent can be used for control mildew, sapstain, and wood rotting organisms. Incorporate AMICAL WP Antmicrobial Agent into appropriate vehicles to protect wood from stain and decay. AMICAL WP Antmicrobial Agent can be utilized in either aqueous or solvents-based systems at concentrations ranging from 0.61%-2.0% (w/w). Solvent-based systems containing mineral spirits require a suitable co-solvent for the incorporation of AMICAL WP Antmicrobial Agent into the system. Formulators are responsible for obtaining EPA registration of formulated products.

## USE IN METALWORKING FLUIDS

AMICAL WP Antmicrobial Agent is recommended for use in metalworking fluids and lubricants to prevent fungal growth. The level of AMICAL WP Antmicrobial Agent to be incorporated into metalworking fluid concentrate will vary depending upon the dilution factor recommended by the manufacturer. For efficient fungistatic activity, a concentration 204 to 6122 ppm of AMICAL WP Antmicrobial Agent in the diluted fluid is suggested. AMICAL WP Antmicrobial Agent should be dissolved in an appropriate solvent prior to addition to the metalworking fluid.

## USE IN RUBBER AND PLASTIC PRODUCTS

AMICAL WP Antmicrobial Agent is recommended for PVC, polyurethane, rubber, thermoplastic rubber and other polymeric-based products, coating, adhesives, foams, and sealants requiring protection against microbial deterioration. For control of microbial deterioration use 0.2-1.6% AMICAL WP Antmicrobial Agent based upon total weight of solids in the formulation. AMICAL WP Antmicrobial Agent can be incorporated into the formulation at any convenient state of the manufacturing process.

## USE IN TEXTILES AND NON-WOVENS (NON-CLOTHING)

To prevent mildew growth on products such as canvas, carpet, cordage, drapes, filters, and shower curtains. Use levels depend upon the expected severity of exposure or end-use conditions. In general 1.0-10.2 lb of AMICAL WP Antmicrobial Agent per 1000 lb of dry fabric (1020-10,200 ppm) is needed. AMICAL WP Antmicrobial Agent is best added together with the water-repellent emulsion or dye to ensure durability.

## USE IN PAPER PRODUCTION

This product aids in the control of objectionable fungi pulp, paper mills and the additive system and for the preservation of pulp, pigment slurries, alum, emulsions, adhesives, defoamers, polymers and paper products. This product is used to inhibit fungal growth which causes discoloration, odor and degradation in paper and paperboard. This product is not cleared for use in the manufacture of paper and paperboard products that come in contact with food.

Additions can be made on a continuous or intermittent basis, depending upon the severity of the contamination. Badly fouled systems must be cleaned before treatment is begun. Apply at a point in the system where the product will be uniformly mixed.

Intermittent or Slug Method - Initial Dose: When the system is noticeably fouled, add this product at the rate of 0.0016 to 1.6 lb per ton of pulp, or paper produced. Addition to the additive system should be made directly at the rate of 0.008 to 6.78 lb (0.98 to 816 ppm) per 1000 gallons. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add this product at the rate of 0.0016 to 0.8 lb per ton of pulp of paper produced. Treat the system as needed to maintain control. Addition of this product to the additive system may be reduced to 0.008 to 3.43 lb (0.98 to 408 ppm) per 1000 gallons.

Continuous Feed Method - Initial Dose: When the system is noticeably fouled, add this product at the rate of 0.0016 to .08 lb per ton of pulp of paper produced. Additions of this product to the additive system should be made directly at the rate of 0.008 to 5.14 lb (0.98 to 612 ppm) per 1000 gallons. Continue until control is achieved. Subsequent Dose: Maintain by continuous feed of this product at the rate of 0.006 to 0.8 lb per ton of pulp and paper produced.

## MOLD INHIBITION IN PAPER AND PAPERBOARD

This product is used to inhibit fungal growth which causes discoloration, odor and degradation in paper and paperboard. This product may be applied to the white water or stock rate of 0.04 to 6.9 lb per ton of dry fiber produced. For inhibition of wet lap or sheet pulp, this products should be applied to the dewatered pulp surfaces via applicator rolls or shower at 0.04 to 6.9 lb per ton of dry fiber produced. Application can also be made at the size press or water box. Application is made at the rate of 163 to 16,300 ppm of this product in the solution applied to the paper sheet.

## PRESERVATION IN PAPER PLANT STORAGE

This product should be added directly to the material to be preserved prior to manufacturing into the finished product, i.e., pulp, alum, broke, polymers, defoamers, emulsions, adhesives, paper mill coating, pigment and slurries. The dosage rate will depend upon the material to be preserved and the storage time. The usual additions should be 0.4 ppm for storage of microbial resistant materials up to 510 ppm for less resistant materials. Under extreme conditions of spoilage the dosage rate should be increased to 8.2-816 ppm. The above recommendations are based on a maximum storage time of two weeks.

NET WT: 100 lb

