

JUN 16 2003

The Dow Chemical Company
1500 E. Lake Cook Road
Buffalo Grove, IL 60089

Attention: Allen F. Bollmeier
Regulatory Specialist

Subject: BioBan P-1487T
EPA Registration No. 464-674
Amendment Dated March 21, 2003

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided that you make the following labeling changes under "Minor Conditions" for our review.

- To revise the First Aid statement per PR Notice 2001-1
- To update Environmental Hazards statement
- To change the ingredient statement to the nominal concentration
- To revise the Precautionary Statements

Minor Conditions

1. Revise the instructions in the Precautionary Statements to read:

Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through skin. May cause allergic skin reaction. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

2. Submit a revised Confidential Statement of Formula (CSF) since you have changed the ingredient statement to the nominal value on the label. Please note that the Basic CSF dated January 16, 2003 was accepted under a separate letter.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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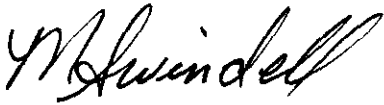
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General Comments

Submit two (2) copies of final printed labeling for our review. A stamped copy of the accepted labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobial Division (7510C)

Enclosure

BIOBAN® P-1487T ANTIMICROBIAL AGENT

Active Ingredient:

4-(2-Nitrobutyl)morpholine . . . 36.2% by wt
4, 4'-(2-Ethyl-2-nitrotrimethylene)
dimorpholine 2.0% by wt
Inert Ingredients 61.8% by wt
Total 100%

EPA Reg. No. 464-674
EPA Est. No. 48301-LA-001

KEEP OUT OF REACH OF CHILDREN

DANGER
PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUSES IRREVERSIBLE EYE DAMAGE.
HARMFUL IF SWALLOWED OR ABSORBED
THROUGH THE SKIN. MAY CAUSE ALLERGIC
SKIN REACTION.

Do not get in eyes, on skin, or on clothing.
Wash thoroughly with soap and water after
Handling.

with COMMENTS
in EPA Letter Dated:

JUN 16 2003

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



THE DOW CHEMICAL COMPANY
Midland, Michigan 48674 U.S.A.

1-800-258-CHEM

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7717-101 / 2601-1749

Active

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 five minutes, then continue rinsing eyes. Call a poison control center or doctor for treatment advice.

If swallowed: 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 by a poison control center.

If on skin: Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment.

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.

Note to physician: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. 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 of Regional Office of the EPA.

IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect **989-636-4400**.

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

Triple rinse (or equivalent). Then offer for recycling or reconditioning by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

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

FOR USE IN METALWORKING FLUIDS

BIOBAN P-1487T is recommended for use in soluble oils, semi-synthetic, to the sump (with agitation). A dose of 1000 - 2000 ppm is recommended, but no greater for foated systems. After addition of BIOBAN P-1487T, 1 hour before shut-down.

In Diluted Fluids: A concentration of 1000 to 2,500 ppm of BIOBAN P-1487T growth. For example, add 1.0 lb of BIOBAN P-1487T to 1,000 lb of fluid to maintain.

FOR USE IN HYDROCARBON PRESERVATION

To control the growth of problem microorganisms associated with the fuel in general use. Add BIOBAN P-1487T to storage tanks or fuel tanks for oil, gasoline, or kerosene. Treatment may be performed by slug dosage or by intermittent of BIOBAN P-1487T.

For storage above water. Add 2.2 gallons of BIOBAN P-1487T to each 1,000 gallons of water and add this solution directly to the water phase in the tank. For storage in tanks without intentional water. Add 0.25 - 2.2 gallons of BIOBAN P-1487T to each 1,000 gallons of hydrocarbon in the system to obtain a concentration of approximately 500 ppm. In a fuel-treatment pre-mix, BIOBAN P-1487T may be mixed with other fuel additives. Add sufficient BIOBAN P-1487T to the pre-mix to provide 500 - 2,500 ppm.

FOR USE IN ADHESIVES AND INDUSTRIAL

For control of microbial contamination in resin, latex or other water-based emulsions of microorganisms in adhesives, add 0.05 - 0.2% (500 - 2,000 ppm) BIOBAN P-1487T to the mixture as a final step in the manufacturing process after any heating and curing.

FOR USE IN INKS (NON-FOOD USE)

To inhibit the growth of microorganisms during storage or use of water-based inks. Add BIOBAN P-1487T in the final step of the manufacturing process. BIOBAN P-1487T should be dosed at 500 - 2,000 ppm. BIOBAN P-1487T may be added press-side at a concentration of 500 - 2,000 ppm.

FOR USE IN DIE CAST LUBRICANTS AND MOLDING

To control the growth of microorganisms in fluids used as lubricants in metalworking and in the manufacture of plastics.

BIOBAN P-1487T is recommended for use in soluble oils, semi-synthetic, and to the sump (with agitation). A dose of 1000 - 2000 ppm is recommended, but no greater for foated systems. After addition of BIOBAN P-1487T, 1 hour before shut-down.

In Diluted Fluids: A concentration of 1000 to 2,500 ppm of BIOBAN P-1487T in growth. For example, add 1.0 lb of BIOBAN P-1487T to 1,000 lb of fluid to maintain.

Maintenance Dosage: Add 500 - 1000 ppm of BIOBAN P-1487T to maintain.