469-679

06/04/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Ms. Abigail Trueblood Senior Regulatory Specialist for, The Dow Chemical Company 1803 Building Midland, MI 48674

JUN 4 2010

Subject: BIOBAN P-1487T[™]Antimicrobial Agent EPA Registration Number 464-674 Your Amendment Dated March 29th, 2010 EPA Received Date April 1st, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to update the Precautionary Statements, Environmental Hazard statements as per the BioBan P-187 Red as well as update the First Aid statement for eye contact, is acceptable.

A copy of the stamped labeling is enclosed.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

Marshall Swindell Product Manager 33 Regulatory Management Branch I Antimicrobials Division(7510P)

ACCEPTED with COMMENTS EPA Letter Dated:

1

BIOBAN TM P-1487T Antimicrob Active Ingredient(s): 4-(2-Nitrobutyl)morpholine 4,4'- (2-Ethyl-2-nitrotrimethylene)dimorpholin	registered unter EP 36.5 % Dy We er EP	4 2010 Insecticide, enticide Act as esticide, PA Reg. No. 464-674
Inert Ingredients	61.2 % by wt 100%	۲. ۲. ۵
E.P.A. Registration No. 464- 674 E.P.A. Est. XXXX-XX-X	сф (fr с с с	Girt s GrC U
KEEP OUT OF REACH OF CHILDREN	(70), 0, 0 0 0 76, 0 8, 0	ο τ τ.ο.τ.τ. τ.
DANGER	``4 € ⊗ ∞ €) € ₹, Ģ	6 6 6

	FIRST AID
IF IN EYES:	 Hold eyes open and rinse slowly and gently with water for 30 minutes. Remove contact lenses, if present, after the first 5 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 or doctor.
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 and the give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment
	HOT LINE NUMBER
	RGENCY endangering life or property involving this product, call collect
	he product container or label with you when calling a poison control center or
doctor or going for treatr	
NOTE TO PHYSICIAI	N: Probable mucosal damage may contraindicate the use of gastric lavage.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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 when handling. Wear a long-sleeve shirt, long pants, shoes, socks, and chemicalresistant gloves. Wash thoroughly with soap and water after handling and before eating, **BIOBAN P-1487T Antimicrobial Agent** Master Label March 31, 2010

drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

JUN 4 201n

ACCEPTED

with COMMENTS

This pesticide is toxic to fish and aquatic invertebrates. Do not discharge efficient Insecticide. This pesticide is toxic to fish and aquatic inverteorates. Do not discharge infiguration in the pesticide are infigurated and infiguration in the pesticide act as in accordance with the requirements of a National Pollutant Discharge Gisminationer EPA Reg. No. 464-67-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 plan authority. For guidance, contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

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:

Nonrefillable Container: Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

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 and synthetic fluids. It should be added directly in the sump (with agitation). A dose of 1000-2000 ppm is recommended for initial treatment; higher levels up to 2500 ppm, but no greater, for fouled systems. After addition of BIOBAN P-1487T the system should be circulated for about one hour before shut down.

In Diluted Fluids: An initial concentration of 1000to 2500 ppm of BIOBAN P-1487T is sufficient to control gross microbial growth. For example, add 1.0 lb of BIOBAN P-1487 T to 1000 lb of fluid to obtain a dose level of 1000 ppm in the fluid.

Maintenance Dosage: Add 500-1000 ppm of BIOBAN P-1487T to maintain control of the system

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 control of microbial growth in diesel oil, fuel oil, gasoline, or kerosene. Treatment may be performed by slug dosage or by intermittent metering to attain the proper concentration of BIOBAN P-1487T.

For Storage Above Water: Add 2.2 gallons of BIOBAN P-1487T to each 1000 gallons of water in the bulk storage system to achieve a concentration of approximately 2200 ppm. To facilitate mixing dissolve each

BIOBAN P-1487T Antunicrobial Agent Master Label March 31, 2010

gallon of BIOBAN P-1487T in 100 gallons of water and add this solution directly to the water phase in the tank with minimal agitation.

For Storage in Tanks Without Intentional Water: Add 0.28-2.2 gallon of BIOBAN P-1487T directly to each 1000 gallons of hydrocarbon in the system to obtain a concentration of approximately 280-2200 ppm.

In a Fuel-Treatment Pre-Mix: BIOBAN P-1487T may be mixed with other fuel additives for addition to fuel. The end user must add sufficient BIOBAN P-1487T to the pre-mix to provide 280-2200 ppm of BIOBAN P-1487T in the treated fuel.

Notice: Seller warrants that the product conforms to its chemical description as contained on this label and is reasonably fit for the purposes stated on this label when used in accordance with directions under normal conditions of use. THE WARRANTIESMADE IN THIS PARAGRAPH ARE SELLER'S SOLE WARRANTIES AND ARE MADE EXPRESSLY IN LIEU OF AND EXCLUDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIONS AND WARRANTIES.

NET WT: LOT:

Produced for:

THE DOW CHEMICAL COMPANY Midland, Michigan 48674 USA (989)636-4400

> ACCEPTED with COMMENTS • EPA Letter Dated:

JUN 4 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended. for the pesticide, registered under EPA Reg. No. 464-674