

June 3, 2003

Mr. Allen F. Bollmier
Regulatory Specialist
The Dow Chemical Company.
1803 Building
Midland, MI 48674

Subject: **BIOBAN BNS 25% BA Industrial Preservative**
EPA Registration Number 464-684
Application March 7, 2003

Dear Mr. Bollmeier:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comments.

Proposed Amendment

- Revised first aid instructions (Per PR Notice 2001-1)
- Removal of end-use instructions from manufacturing use label

General Comments:

1. The Word "Warning" must be added to the precautionary Statement subheading to read:

**PRECAUTIONARY STATEMENT
HAZARD TO HUMANS AND DOMESTIC ANIMALS**

WARNING CONCURRENCES

SYMBOL								
SURNAME								
DATE								

2. The Storage and Disposal statements format must be revised to read as follows:

STORAGE AND DISPOSAL

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

"PESTICIDE STORAGE: Store the product (**You must include the storage information**)

"PESTICIDE DISPOSAL: Pesticide wastes are ..Regional Office for guidance."

"CONTAINER DISPOSAL: Triples rinse....and local authorities."

"BULK CONTAINERS (Tote Tanks): Do not rinse ... purchase for full refund".

Refer to PR Notice 83-3 for detailed information and appropriate languages.

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 or comments concerning this letter, please contact me at (703) 308-6422 or Drusilla Copeland at (703) 308-6224.

Sincerely,

for Drusilla Copeland

Adam Heyward

Product Manager (34)

Regulatory Management Branch II

Antimicrobials Division (7510C)

BNS 25%-BA

INDUSTRIAL PRESERVATIVE

INGREDIENTS:

Nitrostyrene	25.0%
Other Ingredients	75.0%
TOTAL	100.0%

PRECAUTIONS

Prevent temporary eye injury and skin irritation through skin. Do not wear a MSHA/NIOSH approved respirator for repeated skin contact. Do not get in eyes, nose, and water after handling before reuse.

Do not discharge to streams, ponds, estuaries, or other bodies of water without the requirements of a NPDES permit and the appropriate discharge. Do not use in closed systems without proper ventilation. For guidance contact the EPA.

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 or doctor. Do not give anything by mouth to an unconscious person.

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



THE DOW CHEMICAL COMPANY

Midland, Michigan 48674 U.S.A.

(800) 836-4400

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DIRECTIONS FOR USE

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

FOR MANUFACTURING OR REFORMULATION USE

Only for formulation into an preservative for the following uses:

- Paper Mill Process Water
- Paper Mill Bulk-Pulp (non-food contact)
- Mold Inhibition in Paper and Paperboard (non-food contact)
- Starch, Size, Retention Aids and Paper Coatings (non-food contact)
- Once Through Industrial Cooling Water Systems
- Recirculating Cooling Water
- Auxiliary Water and Waste Water
- Packer Fluids and Drilling Muds
- Secondary and Tertiary Oil Recovery Systems
- Metalworking Fluids
- Leather
- Adhesives, Caulks and Sealants
- Consumer, Household and Institutional Products
- Printing Inks, Dyes, Textile Lubricants, Guar Gum, and Fountain Solutions
- Surfactant Preservation
- Fabric Mildewcide
- Coating Pigments and Mineral Slurries
- Paints, Latex, Antifoams, and Emulsion Systems

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

Pesticide or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides.

Triple rinse the container or equivalent before sending to drum conditioner or destroying by perforation or crushing. Consult Federal, state or local authorities for approved alternative procedures.

ACCEPTED
with COMMENTS
EPA Letter Dated:

JUN - 3 2003

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

464-684