

464-8123

12-22-2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Abigail Trueblood
Senior Regulatory Specialist
The Dow Chemical Company
1500 East Lake Cook Rd.
Buffalo Grove, IL 60089

DEC 22 2009

FILE COPY

Subject: Notification Application per PR Notice 2007-4
FILMGUARD™ IPBC 100 Fungicidal Agent
EPA Registration Number: 464-8123
Application Date: December 4, 2009
Receipt Date: December 7, 2009

Dear Ms. Trueblood:

This will acknowledge receipt of your notification, submitted under the provisions of PR Notice 2007-4.

Proposed Notification:

Updated Storage and Disposal language

General Comment:

Based on a review of the material submitted, the following comment applies:

The notification is acceptable.

Should you have any questions concerning this letter, please contact Heather Garvie at (703) 308-0034 or by email address at garvie.heather@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "ShaRon Carlisle".

ShaRon Carlisle
(Acting) Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)



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 464-8123	2. EPA Product Manager S. Carlisle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) FILMGUARD IPBC 100 Fungicidal 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.)

Notification to update label in response to PR Notice 2007-4. Enclosed letter contains required Notification Certification

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"/> Text No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	<input type="checkbox"/> Plastic	
		If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Various		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
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 Abigail Trueblood	Title Senior Regulatory Specialist	Telephone No. (Include Area Code) 847-808-9555
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 	3. Title Senior Regulatory Specialist	
4. Typed Name Abigail Trueblood	5. Date December 4, 2009	



December 4, 2009

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

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900
2777 S. Crystal Drive
Arlington, VA 22202-4501

Re: **NOTIFICATION- EPA Reg. No. 464-8123**
FILMGUARD™ IPBC 100 Fungicidal Agent
The Dow Chemical Company

Dear Ms Carlisle:

The Dow Chemical Company (Dow) hereby submits a label Notification to revise the container disposal statement in response to PR Notice 2007-4. The language used for this notification was approved previously for 464-403.

In order for the application to be processed the required Notification Statement is below:

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 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 violation of 18 U.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 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

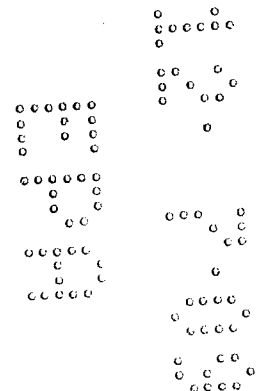
Enclosed are the following documents to support this Notification:

- EPA Form 8570-1, marked for Notification
- One copy of the proposed label with changes highlighted

Please contact me if you have any questions or need additional information.

Sincerely,

Abigail Trueblood
Senior Regulatory Specialist
The Dow Chemical Company
1500 East Lake Cook Rd.
Buffalo Grove, IL 60089
847-808-3555
atrueblood@dow.com



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FILMGUARD IPBC 100 FUNGICIDAL AGENT

Master Label

December 4, 2009

FILMGUARD™ IPBC 100 FUNGICIDAL AGENT

For industrial use only as a preservative for aqueous compositions including, adhesives, aqueous metalworking fluids, plastics, cordage, textiles, inks, paints and stains, plastics, paper coating, wood preservation

ACTIVE INGREDIENT

3-Iodo-2-propynyl butyl carbamate 98%
 INERT INGREDIENTS (OTHERS). 2%
 Total 100%

NOTIFICATION
 Date Reviewed: 12/22/09
 Reviewed By: *A. Barrie*

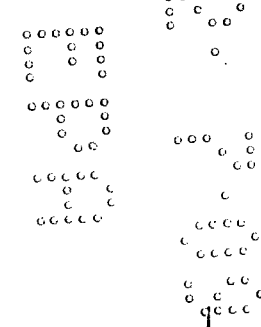
E.P.A. Registration No. 464-8123

E.P.A. Est. XXX-XX-X

KEEP OUT OF REACH OF CHILDREN

DANGER- PELIGRO

FIRST AID	
IF INHALED	<ul style="list-style-type: none"> • 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 advice
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • 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
IF IN EYES	<ul style="list-style-type: none"> • Hold eye 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 eye. • Call a poison control center or doctor for treatment advice
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have affected 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.
HOT LINE NUMBER	
<p>IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect (989) 636-4400. Have the product container or label with you when calling a poison control center or doctor or going for treatment.</p>	
<p>NOTES TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Exposure to high concentrations via inhalation may result in the inhibition of acetylcholinesterase and produce related symptoms.</p>	



FILMGUARD IPBC 00 FUNGICIDAL AGENT
Master Label
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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CORROSIVE. Causes skin burns and irreversible eye damage. Do not get in eyes, on skin, or on clothing. Harmful if swallowed, inhaled or adsorbed through the skin. Avoid breathing vapor or spray mist. Wear goggles or face shield, protective clothing, chemical-resistant (such as nitrile or butyl) gloves. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans or public 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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep container tightly closed when not in use. Store in a cool place. Do not store with strong oxidizing agents or strong (concentrated acids).

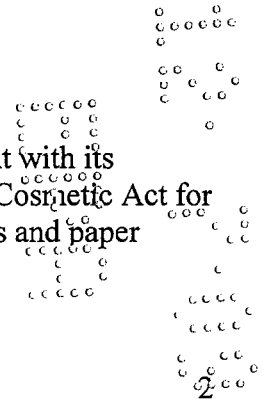
PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, pesticide spray or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

Nonrefillable container: Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mix tank. Triple rinse drum liner and remove liner and dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Then offer drum for recycling if available. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This formulation is not cleared by the Federal Food, Drug and Cosmetic Act for use in manufactured food grade adhesive, paper and paper board products and paper coating.



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Dry Film Paint Preservative

FILMGUARD IPBC 100 Fungicidal Agent inhibits the growth of mildew in solvent-based paints and waterborne paints, stains and latex emulsions. For best results, it should be solubilized in a suitable solvent prior to adding to the paint. Addition should be at the end of the manufacturing process and allowed to mix long enough to be adequately dispersed. Typical levels for protection against mildew on painted surfaces are 0.1-0.5% by weight on wet paint. For example, house paint with a wet density of 10 lbs. per gallon would use 1-5 lbs. of this product per 100 gallons of wet paint. Where the climate is severe and mildew growth is a major problem for painted surfaces, more would be required, as much as 0.8% by weight in the paint.

Aqueous Metalworking, Cutting, Cooling & Lubricating Concentrates

To inhibit the growth of fungi in aqueous metalworking, cutting, cooling and lubricating concentrates, add an amount that will give up to 1,000 ppm in the diluted fluid. The amount required in the concentrate will depend on the end use dilution. For example, if the desired level of this product in the diluted fluid is 100 ppm, and the end use dilution of the fluid is 5%, then a 0.2% concentration of this product is required in the concentrate (100 ppm/0.05= 2,000 ppm or 0.2%).

Aqueous Metalworking, Cutting, Cooling & Lubricating Fluids

To inhibit the growth of fungi in aqueous metalworking, cutting, cooling and lubricating fluids add up to 1000 ppm (0.1% w/w/ of this product to the diluted fluid (1.0 lbs. per 1000 lbs of solution or approximately 0.8 lbs. per 100 gallons of solutions or 1.0 kg per 1000 kg). This product may be added to the fluid at the time it is prepared (diluted) or to the reservoir (sump) containing the fluid after it is put into use. If it is added to the reservoir, the fluid should be circulated after addition to ensure mixing.

Fungicide in Non-medical, Non-food Contact Aqueous, Solvent and Non-solvent Based Systems Such as Natural and Synthetic Adhesives, Caulks, Patching Compounds, Sealants, Grouts, Latexes Such as SBR/Latex Used in the Manufacture of Flooring Adhesives or Carpet Backings

FILMGUARD IPBC 100 Fungicidal Agent can be used as an additive to non-medical, non-food use natural and synthetic adhesives, caulks, patching compounds, sealants, grouts, latexes such as SBR/latex flooring adhesives or carpet backings to prevent the growth of fungi, molds and mildews in the material both in the wet state and in the dry film of the finished product. Recommended use levels are between 0.02-0.25% wet formulation weight. FILMGUARD IPBC 100 Fungicidal Agent should be added toward the end of the production cycle with good agitation to ensure uniform distribution. For example, to inhibit the growth of mildew on a latex-based wall cover adhesive for a non-food area, add 0.2% (2 lbs. of FILMGUARD IPBC 100 Fungicidal Agent per 1000 lbs. of latex- based adhesive formulation) of this product to the latex-based formulation.

Plastics and Plastic Coatings

FILMGUARD IPBC 100 Fungicidal Agent may be used to prevent surface mildew growth on plastic items, such as shower curtains, cable and wire insulation, sun



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umbrellas, polymer furniture, filter medias, polymer components of carpet etc. Intended plastics include polymers such as PVC, polyurethanes, elastomers and rubbers, neoprene, styrene compounds, polyolefins, etc. Use levels of 0.05-1.0% by weight of the plastic are generally adequate. This product should be dispersed in the plasticizer or color concentrate before it is incorporated into the resin to ensure a uniform distribution. Use of this product is not recommended if the heat of processing is above 350° F for prolonged periods, not should it be used in a plastic that will be in contact with food or in medical device applications. For example, to inhibit growth on a plastic such as polyurethane boat cushions intended for a non-food area add 0.5% (5 lbs. FILMGUARD IPBC 100 Fungicidal Agent per 1000 lbs. of polyurethane formulation) of this product to the polyurethane formulation.

Paper Coatings

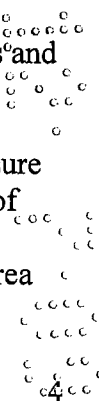
FILMGUARD IPBC 100 Fungicidal Agent may be used as a mildewcide in both aqueous and solvent-based coatings which are applied to paper and cardboard substrates. This product can be used to prevent mold and mildew from growing in products such as corrugated cardboard or soap wrappers, wall covers, non-food contact packaging materials, and non-food contact paper tapes. Use levels of this product range from 0.02-0.75% of this product by weight. This product should be added at the end of the production cycle and with good agitation to prevent possible mechanical losses and to ensure uniform distribution. As an example, to inhibit the growth of mildew on corrugated cardboard intended for non-food packaging, add 0.5% (5 lbs. FILMGUARD IPBC 100 Fungicidal Agent per 1000 lbs. coating material) of this product to the coating material formulation.

Cordage

FILMGUARD IPBC 100 Fungicidal Agent may be used as a mildewcide in both aqueous and solvent based process formulations which coat cordage. Typical use levels of this product will range from 0.02-1% of the process formulations used in the process of these cordages. This product should be added to the process formulation at the end of the production cycle with good agitation to prevent possible mechanical losses and to ensure a uniform distribution. As an example, to inhibit the growth of mildew on cordage intended for a non-food area, add 0.5% (5 lbs FILMGUARD IPBC 100 Fungicidal Agent per 1000 lbs. of process formulation) of this product to the process formulation.

Textiles

FILMGUARD IPBC 100 Fungicidal Agent may be used as a mildewcide applied in both aqueous and solvent-based coatings or dyes which are typical to the textile material processing. Typical end use applications of these materials may include carpet fibers and backings, canvas and cordage, drapes and shower curtains. Not to be used in fabrics intended for human wear or direct skin contact. The product should be solubilized or stirred in the dye bath or polymer coating pan to minimize mechanical losses and ensure a uniform distribution of the product. Use levels in the range of 0.02-1% by weight of the total processing formulation are typically adequate to prevent fungal growth. For example, to inhibit the growth of mildew on cotton canvas intended for a non-food area



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add 0.5% (5 lbs FILMGUARD IPBC 100 Fungicidal Agent per 1000 lbs dye bath) of this product to the dye bath formulation

Inks

FILMGUARD IPBC 100 Fungicidal Agent may be used in aqueous-based ink solutions for protection of these solutions against attack by fungal organisms. It is recommended that this product will be added at the end of the production cycle with good agitation. This product will generally impart protection when used at levels of 0.05-3.0% of active ingredient based on the formula weight.

Wood Preservation

FILMGUARD IPBC 100 Fungicidal Agent is a white powder, non-metallic compound designed as a wood preservative for use in above ground applications. All recommendations of use levels are in percentage by weight and refer to this product. Dosage ranges are given for the various applications to indicate the approximate levels for a particular application. Exact levels of use should be determined by field trials.

For best results this product should be solubilized in a suitable solvent or made into an aqueous dispersion and then applied to new lumber, plywood, particle board, millwork, etc., to prevent the growth of mildew, sapstain and wood rot on these substrates. This product is recommended for use on wood in above ground use only.

Treating solutions may be prepared by dissolving this product in alcohols or aromatic solvents or by dispersion in water. Levels of 0.10-1.5% of this product are suggested depending upon the severity of conditions for end use, and the extent of time that protection is required.

For freshly sawn lumber, a concentration of 0.2% of this product is suggested as a starting level. A one minute dip at ambient temperatures in a solution or aqueous dispersion containing 0.2% of this product should be adequate to control the development of mildew and sapstain organisms on the lumber. Because of the great variation in susceptibility of fresh sawn lumber relating to the type of wood, sawing and storage techniques, conditions of humidity, method of treatment, etc. it is usually necessary to carry out field tests to determine the most appropriate means of application and the optimum concentration of this product to be used.

For best results lumber should be treated within twenty-four hours after it is sawed. The lumber should be completely immersed in the treating bath, and the treating vat designed to permit easy immersion and removal, and to minimize spillage. The vat may be cleaned by emptying and rinsing with a suitable solvent or by use of a detergent solution. To add additional product while treating, first prepare the proper solution or emulsion in a separate container (of wood, plastic or stainless steel construction) and add to the treating vessel.

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After treatment lumber should be stacked in a properly maintained seasoning yard with good drainage so that no water will accumulate in any area. The yard should be kept free from weeds and vegetation, which may hold moisture and promote growth of decay and stain producing fungi. All debris and lumber scraps should be removed from the area. A properly laid out yard should take advantage of prevailing winds to permit good air circulation. Main alleys should be at least 16 feet wide. Stack foundations should be sufficiently elevated to permit ready access of air to the pile and allow water to drain off quickly.

Millwork

This product is also recommended for use in millwork, including door and window frames, exterior siding, composite board, plywood and other construction lumber when it is important to prevent the growth of mildew, sapstain and wood rot organisms on these materials. Wood treated with this product does not change in appearance and may be painted when dry. For applications of this type, this product may be applied by dipping, brushing, spraying, or pressure treatment. Levels of 0.15% may be used for mildew control.

To control rot and decay, do not use less than 0.2% as a concentration. Use this product in solution in a suitable solvent. Concentrations up to 1.0% are recommended depending upon the condition of the wood, the nature of the intended exposure, and the length of protection desired.

When brushing a single coat will usually suffice if the solution is applied liberally. This also pertains to spraying. Use of this product is not recommended for wood surfaces which may come in contact with food. Surfaces which may be in continuous contact with skin should be coated with a varnish, or lacquer after treatment with this product. This product may also be used as an additive to stains to be applied to such materials as exterior siding, decks, lawn furniture etc. in order to prevent the growth of fungal organisms. It is recommended that levels between 0.2- 1% of this product by weight of this product by weight of the final formulation be added to these materials.

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 WARRANTIES MADE 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 WEIGHT:

Produced for:
THE DOW CHEMICAL COMPANY
Midland, Michigan 48674 USA

