

464-8124

12/22/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 22 2009

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

FILE COPY

Subject: Notification Application per PR Notice 2007-4
FILMGUARD™ IPBC 40 Fungicidal Agent
EPA Registration Number: 464-8124
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,

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

Please read instructions on reverse before completing form.

Form Approved OMB No. 2070-0060, Approval expires 2-28-



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 464-8124 | 2. EPA Product Manager S. Carlisle | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) FILMGUARD IPBC 40 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 | If "Yes" Package wgt. No. per container | <input type="checkbox"/> Plastic | |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container 30,50,55 gal;IBC | | 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"/> Other _____ <input type="checkbox"/> Stenciled | | | | <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ | |

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) 847-808-3555 |
| 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 | |



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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. 464-8124
FILMGUARD™ IPBC 40 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 464-673.

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.

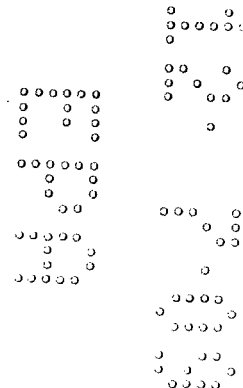
Enclosed are the following documents to support this Notification:

- 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 40 FUNGICIDAL AGENT

Master Label
December 4, 2009

FILMGUARD™ IPBC 40 FUNGICIDAL AGENT

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

ACTIVE INGREDIENT

3-Iodo-2-propynyl butyl carbamate 40%

INERT INGREDIENTS (OTHERS) 60%

Total 100%

E.P.A. Registration No. 464-8124
E.P.A. Est. XXXX-XX-X

NOTIFICATION
Date Reviewed: 12/22/09
Reviewed By: H. Garbu

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 40 FUNGICIDAL AGENT

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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 & DISPOSAL

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

PESTICIDE STORAGE: Store in original container in a cool place. Protect from excessive heat.

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. 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. This formulation is not cleared by the Federal Food, Drug and Cosmetic Act for

FILMGUARD IPBC 40 FUNGICIDAL AGENT

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use in manufactured food grade adhesive, paper and paper board products and paper coating.

Adhesives

FILMGUARD IPBC 40 Fungicidal Agent can be used as an additive to non-medical, non-food use natural and synthetic adhesive formulations and caulks to prevent the growth of fungal organisms in the material both in the wet state and in the dry film of the finished product. Recommended use levels are between 0.05-0.625% wet formulation weight. This product should be added toward the end of the production cycle with good agitation to ensure a uniform distribution. For example, to inhibit the growth of mildew on a latex-based wall cover adhesive for a non-food area, add 0.5% (5 lbs of FILMGUARD IPBC 40 Fungicidal Agent per 1000 lbs of latex-based adhesive formulation) of this product to the latex-based formulation.

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 2,500 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 250 ppm, and the end use dilution of the fluid is 5%, then a 0.5% concentration of this product is required in the concentrate (250 ppm/0.05 lbs= 5,000 ppm or 0.5%).

Aqueous Metalworking, Cutting, Cooling & Lubricating Fluids

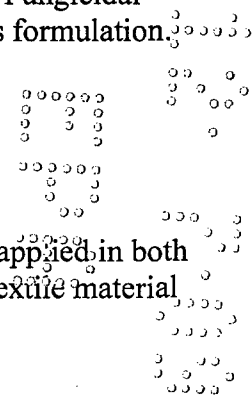
To inhibit the growth of fungi in aqueous metalworking, cutting, cooling and lubricating fluids add up to 2,500 ppm (0.25% v/v) of this product to the diluted fluid (1 quart per 100 gallons of solution or 2.5 liters per 1000 liters). This product may be added to the fluid at the time it is prepared (diluted) 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.

Cordage

FILMGUARD IPBC 40 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 0.05-2.5% 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 1.25% (12 lbs FILMGUARD IPBC 40 Fungicidal Agent per 1000 lbs. of process formulation) of this product to the process formulation.

Textiles

FILMGUARD IPBC 40 Fungicidal Agent may be used as a mildewcide applied in both aqueous and solvent-based coatings or dyes which are typically used in textile material



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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. This 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. Recommended use levels are 0.05-2.5% by weight of the total processing formulation are typically adequate to prevent fungal growth. As an example, to inhibit the growth of mildew on cotton canvas intended for a non-food area add 1.25% (12.5 lbs FILMGUARD IPBC 40 Fungicidal Agent per 1000 lbs. dye bath) of this product to the dye bath formulation

Inks

FILMGUARD IPBC 40 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.

Paints and Stains

FILMGUARD IPBC 40 Fungicidal Agent, used in solvent and waterborne paints and stains, will inhibit the growth of mildew. Addition should be at the end of the manufacturing process and allowed to mix long enough to be adequately dispersed and should not be added to hot paint. Typical levels for protection against mildew on painted surfaces are 0.25-1.2% by weight on wet paint. For example, house paint with a wet density of 10 lbs. per gallon would use 2.5-12.0 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 2.0% by weight in the paint. For interior paint use, approximately half the exterior concentrations should be used, 0.1-0.6% by weight in the paint. Appropriate levels are best determined by field trials.

Plastics and Plastic Coatings

FILMGUARD IPBC 40 Fungicidal Agent may be used to prevent surface mildew growth on plastic items, such as shower curtains, cable and wire insulation, and sun umbrellas. Intended plastics include polymers such as PVC. Use levels of 0.1250-2.5% 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.

Paper Coatings

FILMGUARD IPBC 40 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 0.05-2.0% of this product by weight. This product should be added at the end of the

FILMGUARD IPBC 40 FUNGICIDAL AGENT

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production cycle and with good agitation to prevent possible mechanical losses and to ensure uniform distribution. As an example, to inhibit growth of mildew on corrugated cardboard intended for non-food packaging, add 1.25% (12.5 lbs. FILMGUARD IPNC 40 Fungicidal Agent per 1000 lbs. coating material) of this product to the coating material formulation.

Wood Preservation

FILMGUARD IPBC 40 Fungicidal Agent is a liquid designed for use as an additive to interior or exterior protective coatings to inhibit the growth of mildew on the film surface. It is also recommended 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.

FILMGUARD IPBC 40 Fungicidal Agent may be applied from solvent solutions or aqueous dispersions 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 diluting this product in alcohols or aromatic solvents or by dispersion in water. Levels of 0.25-3% 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 0.5% of this product is suggested as a starting level. A one minute dip at ambient temperatures in a solution or aqueous dispersion containing 0.5% 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 within the range specified.

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.

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

FILMGUARD IPBC 40 F⁰ FICIDAL AGENT

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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 on 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 0.25% may be used for mildew control. To control rot and decay, do not use less than 0.5% as a concentration. Use this product in solution in a suitable solvent. Concentrations up to 2.0% 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 0.5- 2 % 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 CONTENTS:

Produced for:

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

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FILMGUARD IPBC 40 FUNGICIDAL AGENT

Master Label

December 4, 2009

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