

464-8124

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 3 0 2011

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OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Joanne Ryder
Product Stewardship Regulatory Manager
Global Regulatory Sciences and Product Sustainability
Dow Microbial Control, Dow Chemical Company
727 Norristown Rd.
P.O. Box 904
Spring House, PA 19477

Subject: **FILMGUARD™ IPBC 40 FUNGICIDAL AGENT**
EPA Registration Number: 464-8124
Application Date: June 21, 2011
Receipt Date: June 21, 2011

Dear: Ms. Ryder

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

Proposed Amendments

Registrant is revising percentage by weight language

General Comments

Based upon a review of the label submitted, the language revision is acceptable.

Should you have any questions or comments concerning this letter, please contact me by telephone at (703) 308-6416 or by e-mail at Campbell-mcfarlane.jacqueline@epa.gov or Glen McLeod by telephone at (703) 347-0181 or by email at mcleod.glen@epa.gov. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacqueline Campbell-McFarlane".

Jacqueline Campbell-McFarlane
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

FILMGUARD IPBC 40 FUNGICIDAL AGENT

Master Label

June 21, 2011

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 coatings, dispersed pigments 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

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>	

ACCEPTED

JUN 30 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 464-8124

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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. Applicators must wear goggles or face shield, long sleeve shirt and long pants, chemical-resistant (such as nitrile or butyl) gloves and chemical resistant shoes plus socks. 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

PESTICIDE STORAGE: Store in original container in a cool place. Protect from excessive heat. Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

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.



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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. 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.

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. Typical use levels are between 0.05-0.625% wet formulation weight. To ensure uniform distribution, add this product toward the end of the production cycle with good agitation. 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 ($250 \text{ ppm} / 0.05 \text{ lbs} = 5,000 \text{ ppm}$ 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. To ensure uniform distribution and prevent mechanical losses, add this product to the process formulation at the end of the production cycle with good agitation. 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.

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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 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. To ensure uniform distribution and prevent mechanical losses, solubilize or stir the product in the bath dye or polymer coating pan. Use levels range from 0.05-2.5% by weight of the total processing formulation and 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. To ensure uniform distribution, add this product 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. To ensure uniform distribution, add this product at the end of the manufacturing process and allow enough time for the product to fully incorporate into the solution. Do not add this product 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 formulations, use approximately half the exterior concentrations, 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. Do not use this product if the heat of processing is above 350°C for prolonged periods. Do not use in 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

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

Dispersed Pigments

FILMGUARD IPBC 40 Fungicidal Agent is designed for use as a mildewcide in the manufacture and storage of dispersed pigments, extender slurries and colorants. Use levels range from 0.025% - 0.625% of this product by weight to provide 100 to 2500 ppm of active ingredient. Add this product at a point in the production process where sufficient mixing will assure good suspension of the material as other ingredients are added.

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 designed for use as a wood preservative in above ground applications. All applications levels are in percentage by weight for use of this product. Dosage ranges are given for the various applications to indicate the approximate levels for a particular application.

Appropriate levels are best 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 designed 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 is sufficient 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, treat lumber within twenty-four hours after it is sawed. The lumber should be completely immersed in the treating bath, and the treating vat designed to

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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.

To prevent decay and fungi growth after treatment, stack lumber in a properly maintained seasoning yard with good drainage so that no water will accumulate in any area. Keep the yard free from weeds and vegetation, which may hold moisture and promote growth of decay and stain producing fungi. Remove all debris and lumber scraps from the area. Take advantage of prevailing winds to permit good air circulation. Main alleys must be at least 16 feet wide. Elevate stack foundations to permit ready access of air to the pile and allow water to drain off quickly.

Millwork

This product is designed 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. Use concentrations up to 2.0% 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. Do not use this product 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. For best results add 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.

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NET CONTENTS:

Produced for:

THE DOW CHEMICAL COMPANY

Midland, Michigan 48674 USA

(989)636-4400

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