

464-8124

1/25/2012

1089



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JAN 25 2012

Ms. Joanne Ryder  
Dow Chemical Company  
1803 Building  
Midland, MI 48674

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Subject: **FILMGUARD IPBC 40 FUNGICIDAL Agent**  
EPA Registration No.: 464-8124  
Amendment Date: November 29, 2011  
EPA Receipt Date: November 30, 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 with conditions.

**Proposed Amendment**

Update label per IPBC RED

**Conditions**

Revise label as follows:

1.) Revise the "Precautionary Statements" on page 2 to read:

DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. Harmful if swallowed, inhaled, or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions to some individuals.

2.) Add a "Personal Protective Equipment (PPE)" section immediately after the "Precautionary Statements" on page 2 that reads as follows:

Applicators must wear:

- Goggle or faceshield
- Long-sleeved shirt and long pants
- Chemical resistant gloves (nitrile or butyl)
- Chemical resistant shoes plus socks

SYMBOL	Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.						
	<b>CONCURRENCES</b>						
	SURNAME						
DATE							

3.) Add a "User Safety Instructions" section immediately after the "PPE" section on page 2 that reads as follows:

Users must:

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

User must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User must remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users must remove PPE immediately after handling the product. As soon as possible, wash thoroughly and change in to clean clothing.

4.) Place the statement, "Do not contaminate water, food, or feed by storage or disposal," to appear immediately after the "Storage and Disposal" heading on page 2.

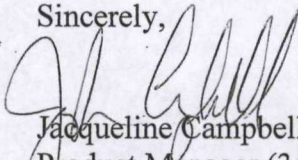
5.) Revise the 2<sup>nd</sup> statement under "Plastics and Plastic Coatings" on page 4 and 2<sup>nd</sup> statement of second paragraph under "Wood Preservation" on page 6 to be in compliance with PR Notice 2000-5, Mandatory Labeling, by deleting the term, should, and state "must."

**General Comments**

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Lorena Rivas by telephone at (703) 347-0181 e-mail address at: [rivas.lorena@epa.gov](mailto:rivas.lorena@epa.gov).

Sincerely,



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

CONCURRENCES							
SYMBOL	Enclosure	Stamped Label					
SURNAME							
DATE							

3089

FILMGUARD IPBC 40 FUNGICIDAL AGENT

Master Label

October 19, 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"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice</li> </ul>
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
IF IN EYES	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
IF SWALLOWED	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have affected person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>HOT LINE NUMBER</b>	
<p><b>IN CASE OF AN EMERGENCY</b> 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><b>NOTES TO PHYSICIAN:</b> 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  
with COMMENTS  
EPA Letter Dated:

JAN 25 2012

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

464-8124

**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. Users should wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this products concentrate. Do not reuse them. Users should remove personal protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

**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 other 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

50F9

FILMGUARD IPBC 40 FUNGICIDAL AGENT

Master Label

October 19, 2011

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

Do not apply this product in a way that will contact workers or other persons.

**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 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. To ensure uniform distribution and prevent mechanical losses, add this

FILMGUARD IPBC 40 FUNGICIDAL AGENT

Master Label

October 19, 2011

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.

**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 0.125-2.5% by weight of the plastic are generally adequate. This product should be dispersed in the plasticizer or

# FILMGUARD IPBC 40 FUNGICIDAL AGENT

Master Label

October 19, 2011

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 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

FILMGUARD IPBC 40 FUNGICIDAL AGENT

Master Label

October 19, 2011

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 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.



9089

FILMGUARD IPBC 40 FUNGICIDAL AGENT

Master Label

October 19, 2011

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

Handwritten scribbles and markings on the right side of the page, including several lines of small, illegible characters and symbols.