



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 20, 2016

Alexis L. Chapman
Product Stewardship Senior Regulatory Specialist
Dow Microbial Control
200 Larkin Center
Midland, MI 48674

Subject: Notification per PRN 98-10 – Remove restriction for Dispersed Pigments use
Product Name: Filmguard IPBC 40 Fungicidal Agent
EPA Registration Number: 464-8124
Application Date: March 16, 2016
Decision Number: 515574

Dear Ms. Chapman:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Tom Luminello at (703) 308-8075 or via email at luminello.tom@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Tom Luminello". To the right of the signature is the word "for" in a smaller font.

Jacquie Hardy, Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510)

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%

Contains 3.88 lbs. of active ingredient per gallon

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

NOTIFICATION

464-8124

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

04/20/2016

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	
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.	
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.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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 in some individuals.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators must wear:

- Goggles or face shield
- Long-sleeve shirt and long pants
- Chemical-resistant gloves (nitrile or butyl)
- Chemical resistant shoes plus socks

Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Instructions

Users must:

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Users must wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users must remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

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 plan 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: 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.

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 of 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

FILGUARD 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 FILGUARD IPBC 40 Fungicidal Agent per 1000 lbs. of process formulation) of this product to the process formulation.

Textiles

[Not registered for this use in the State of California-Optional Statement]

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. of dye bath) of this product to the dye bath formulation.

Inks

FILMGUARD IPBC 40 Fungicidal Agent may be used in aqueous-based 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 in 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 installation, 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 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. FILGUARD IPBC 40 Fungicidal Agent per 1000 lbs. coating material) of this product to the coating material formulation.

Dispersed Pigments

[Not registered for this use in the State of California-Optional Statement]

FILGUARD IPBC 40 Fungicidal Agent is designed for use as a middlecide 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 with twenty-four hours after it is saved. 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 the 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

[Not registered for this use in the State of California-Optional Statement]

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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