

464-8125

04/28/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

APR 28 2010

OFFICE OF  
PREVENTION,  
PESTICIDES  
AND TOXIC SUBSTANCES

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

Subject: **Filmguard IPBC 20 Fungicidal Agent**  
EPA Registration Number: 464-8125  
Notification Date: April 9, 2010  
EPA Receipt Date: April 12, 2010

Dear Mr. Trueblood:

This will acknowledge receipt of your notification, submitted under the provision of PR Notice 98-10.

**Proposed Notification:**

- Updating label language to incorporate language required by the Agency

**General Comment:**

Based on a review of the submitted materials, your notification for correcting labeling is acceptable and a part of the records on file.

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](mailto:garvie.heather@epa.gov).

Sincerely,

Jacqueline McFarlane  
(Acting) Product Manager (34)  
Regulatory Management Branch  
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 464-8125	2. EPA Product Manager J. McFarlane	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) FILMGUARD IPBC 20 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 adjust label to incorporate previously required language and to make one label correction per Agency requirement. Cover letter contains required Notification Certification statement

Section - III

1. Material This Product Will Be Packaged In:

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 <input type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.      No. per container	If "Yes" Package wgt      No. per container

3. Location of Net Contents Information  
 Label  Container

4. Size(s) Retail Container  
30,55 gal; totes

5. Location of Label Directions  
 On Label  
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product  
 Lithograph  
 Paper glued  
 Stenciled  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) 847-802-3555
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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 April 9, 2010



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

April 9, 2010

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501  
ATTN: Jacqueline McFarlane

Re: FILMGUARD™ IPBC 20 Fungicidal Agent (EPA Reg. No. 464-8125)  
Notification to correct label language  
Agency letter dated March 22, 2010

Dear Ms. McFarlane:

The Dow Chemical Company (Dow) hereby submits this notification to adjust the label language contained in the USEPA stamped approved label dated 2-1-10 to incorporate language which had been previously required by the Agency. A similar notification was submitted to the Agency on February 22, 2010, but the submitted label did not contain one of the required corrections. The enclosed label contains the following minor changes and one correction:

- Plastics and Plastic Coatings end use: change from "may be used" to "is used"
- Inks end use: Deletion of the word "generally"
- Medium-Total Surface Area Affected Between 10 and 100 Square Feet Clean Up Methods\* section for Other Construction Materials, Concrete, Masonry etc, second paragraph: change "recommended" to "required"

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 please find the following materials:

- EPA Form 8570-1 marked for Notification
- Copy of the EPA stamped label dated 2-1-10
- Copy of the proposed label with changes/correction highlighted
- Copy of 2-22-10 letter of notification denial

Please contact me if you have any questions about this submission.

Sincerely,



Abigail Trueblood  
Senior Regulatory Specialist  
847-808-3555  
atrueblood@dow.com

# FILMGUARD™ IPBC 20 Fungicidal Agent

For industrial use. For control of mildew on paint and stain films, cordage, textiles, paper coatings, plastics and plastic coatings, fungal organisms in adhesives, aqueous metal working fluids and inks, household, industrial and institutional products, leather, sapstain on freshly sawn wood and decay protection in wood and millwork. For surface mold and mildew prevention on cellulosic materials, wallboard, concrete, masonry and other building materials.

## Active Ingredient:

3-Iodo-2-propynyl butyl carbamate \_\_\_\_\_ 20%

Inert Ingredients (Others): \_\_\_\_\_ 80%

Total \_\_\_\_\_ 100%

E.P.A. Registration No. 464-8125

E.P.A. Est. 5901-IA-1

Contains 1.73 lbs. of active ingredient per gallon

## KEEP OUT OF REACH OF CHILDREN WARNING

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Warning. Causes skin irritation. Harmful if swallowed, absorbed through the skin or inhaled. Causes moderate eye irritation. Do not get on skin, in eyes or on clothing. Wear chemical resistant gloves when using this product. Wear chemical goggles. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

### ENVIRONMENTAL HAZARDS

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

Produced For:



THE DOW CHEMICAL COMPANY

Midland, Michigan 48674 U.S.A.

(989) 636-4400

®™ Trademark of The Dow Chemical Company  
("Dow") or an affiliated company of Dow

1405920-200010-DA074

## FIRST AID

<b>IF ON SKIN OR CLOTHING</b>	<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>
<b>IF INHALED</b>	<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>
<b>IF IN EYES</b>	<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>
<b>IF SWALLOWED</b>	<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>

## 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.

## STORAGE AND DISPOSAL

**Do Not Contaminate Water, Food Or Feed By Storage And 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, in available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or, by other procedures approved by state and local authorities.

## LIMITED WARRANTY AND DISCLAIMER

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 WITH RESPECT TO THE PRODUCT 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.

## NOTIFICATION

Date Reviewed: *1/2/10*  
Reviewed By: *4/2/10*

See Directions For Use label adjacent to this label

**NET CONTENTS: XXX gallons**

**NET WT: 479 lbs / 217.27 kg**

**Lot No.:**

5/6

# FILMGUARD™ IPBC 20 Fungicidal Agent

Directions For Use label to be used with FILMGUARD IPBC 20 Fungicidal Agent front panel label.

**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.

## 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 use in the manufacture of food grade adhesive, paper, paperboard products or paper coatings which contact food.

### Adhesives

FILMGUARD IPBC 20 Fungicidal Agent is 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. Use levels are between 0.1-1.25% wet formulation weight. This product is 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 1.0% (10 lbs of FILMGUARD IPBC 20 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 5,000 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 500 ppm, and the end use dilution of the fluid is 5%, then a 1.0% concentration of this product is required in the concentrate (500 ppm/0.05 = 10,000 ppm or 1.0%).

### Aqueous Metalworking, Cutting, Cooling & Lubricating Fluids

To inhibit the growth of fungi in an aqueous metalworking, cutting, cooling and lubricating fluids add up to 5,000 parts per million (0.5% v/v) of this product to the diluted fluid (0.5 gallons per 100 gallons of solution or 5 liters per 1000 liters). Add this product 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, circulate the fluid to ensure mixing.

### Cordage

FILMGUARD IPBC 20 Fungicidal Agent is used as a mildewcide in both aqueous and solvent based process formulations which coat cordage. Use levels of this product will range from 0.1-5% of the process formulations used in the process of these cordages. This product is 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 2.5% (25 lbs FILMGUARD IPBC 20 Fungicidal Agent per 1000 lbs. of process formulation) of this product to the process formulation.

### Textiles

FILMGUARD IPBC 20 Fungicidal Agent is for use as a mildewcide in both aqueous and solvent-based coatings and dyes which are used in textile material processing. End use applications of these materials are: fibers and backings for use in canvas and cordage, drapes and shower curtains. Not to be used in fabrics intended for human wear or direct skin contact. This product is to 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 of 0.1-5% by weight of the total processing formulation are adequate to prevent fungal growth. As an example, to inhibit the growth of mildew on cotton canvas intended for a non-food area add 2.5% (25 lbs. FILMGUARD IPBC 20 Fungicidal Agent per 1000 lbs. dye bath) of this product to the dye bath formulation.

### Inks

FILMGUARD IPBC 20 Fungicidal Agent is used in aqueous-based ink solutions for protection of these solutions against attack by fungal organisms. Add this product at the end of the production cycle with good agitation. This product will impart protection when used at levels of 0.05-3.0% of active ingredient based on the formula weight.

### Paints And Stains

FILMGUARD IPBC 20 Fungicidal Agent, used in solvent and waterborne paints and stains, will inhibit the growth of mildew. Addition is made at the end of the manufacturing process and allowed to mix long enough to be adequately dispersed and is not to be added to hot paint. Use levels for protection against mildew on painted surfaces are 0.5-2.4% by weight in wet paint. For example, house paint with a wet density of 10 lbs. per gallon would use 5-24.0 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 4.0% by weight in the paint. For interior paint use, approximately half the exterior concentrations must be used, 0.2-1.2% by weight in the paint. Appropriate levels are best determined by field trials.

### Plastics And Plastic Coatings

FILMGUARD IPBC 20 Fungicidal Agent is used to prevent surface mildew growth on plastic items: shower curtains, cable and wire insulation, polymer furniture, filter media, and sun umbrellas. Intended plastics include polymers: PVC, polyurethanes, elastomers and rubbers, neoprene, styrene compounds and polyolefins. Use levels of 1.5-5.0% by weight of the plastic are adequate. Disperse this product 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° F for prolonged periods. This product is not to be used in a plastic that will be in contact with food or in medical device applications.

Produced For:



THE DOW CHEMICAL COMPANY

Midland, Michigan 48674 U.S.A.

(989) 636-4400

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### Paper Coatings

FILMGUARD IPBC 20 Fungicidal Agent is used as a mildewcide in both aqueous and solvent based coatings which are applied to paper and cardboard substrates. This product is used to prevent mold and mildew from growing on the following products: corrugated cardboard or wrappers, wall covers, non-food contact packaging materials, and non-food contact tapes. Use levels of this product range from 0.1-3.75% of this product by weight. This product is added 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 growth of mildew on corrugated cardboard intended for non-food packaging, add 2.5% (25 lbs. FILMGUARD IPBC 20 Fungicidal Agent per 1000 lbs. coating material) of this product to the coating material formulation.

### Wood Preservation

FILMGUARD IPBC 20 Fungicidal Agent is a liquid designed for use as a wood preservative in above ground applications. All use levels are in percentage by weight and refer to product. Dosage ranges are given for the various applications to indicate the approximate levels for a particular application. Exact levels of use must be determined by field trials. Do not use at rates higher than those indicated on this label.

FILMGUARD IPBC 20 Fungicidal Agent is 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 for use on wood in ground use only.

Treating solutions are prepared by diluting this product in alcohols or aromatic solvents dispersion in water. The use level range of 0.5-6.0% of this product depends upon the severity of conditions for end use and the extent of time that protection is required.

For freshly sawn lumber, a concentration of 1.0% of this product is a starting level. A 1.0% product dip at ambient temperatures in a solution or aqueous dispersion containing 1.0% product is normally 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 type of wood, sawing and storage techniques, conditions of humidity, method of treatment, etc., it is necessary to carry out field tests to determine the most appropriate method of application and the optimum concentration of this product to be used within the range specified. For best results, lumber must be treated within twenty-four hours after it is sawed. Completely immerse the lumber in the treating bath, and the treating vat designed to permit easy immersion and removal, and to minimize spillage. Clean the vat by emptying and rinsing with a suitable solvent or by use of a detergent solution. To add additional product to a treating solution, 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 stack lumber in a properly maintained seasoning yard with good drainage that no water will accumulate in any area. Keep the yard free from weeds and vegetation, hold moisture and promote growth of decay and stain producing fungi. Remove all debris and lumber scraps from the area. A properly laid out yard takes advantage of prevailing winds to permit good air circulation. Main alleys must be at least 16 feet wide. Sufficiently elevate foundations to permit ready access of air to the pile and allow water to drain off quickly.

### Millwork

This product is for use on millwork, including door and window frames, exterior 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.

For applications of this type, this product is applied by dipping, brushing, spraying or pre-treatment. Use levels are in percentage by weight and refer to this product. Levels of 0.5-4.0% are used for mildew control. To control rot and decay, do not use less than 1.0% concentration. Use this product in solution in a suitable solvent. Concentrations up to 4.0% are used 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 product is not for wood surfaces which come in contact with skin or are in contact with food. Surfaces in continuous contact with skin are to be coated with a varnish or lacquer treatment with this product. This product is also 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. Levels between 1.0-4.0% of this product by weight of the final formulation are added to these materials.

### Leather

FILMGUARD IPBC 20 Fungicidal Agent protects leather from mold and mildew during storage and processing of wet leather stock: pickled, vegetable, chrome, alternative metal-free hides and skins. All use levels are in percentage by weight and refer to this product. For process hides and skin the use level to prevent microbial growth is 0.025-0.4% (250-4000 ppm) based on white lime stock weight. Add directly or in diluted form (prepared with agitation by adding one part FILMGUARD IPBC 20 Fungicidal Agent to four parts water) to pickling or tanning liquor and rinse water in post-tanning re-float.

For tanned leather (pickle, wet-blue, or any tannage), a solution prepared with 0.1-1.0% (10,000 ppm) is applied with brush or roller coating process to treat the entire pallet of stock leather prior to shrink-wrapping, including the ones inside the plastic bags, from microbial growth during storage.

For fat-liquoring or in fresh float an application rate of 0.025-0.2% (250-2000 ppm) based on split and shave weight of leather being processed to prevent microbial growth.

For preservation of treated paste, fat-liquor or finishes FILMGUARD IPBC 20 Fungicidal Agent is mixed with good agitation at a concentration of 0.1-0.25 w/w% (1000-2500 ppm).

### Surface Mold and Mildew Control on Cellulosic Materials, Wallboard, Concrete Masonry and Other Building Materials

FILMGUARD IPBC 20 Fungicidal Agent is used to treat cellulosic building materials including paper, cardboard, wood, plywood, particle board, oriented strand board (OSB), composite structural components; and wallboard, concrete, masonry (including aggregate block, brick, stone) and other building materials to inhibit or prevent the growth of surface mold which materials are subjected to moist or wet environments. Before applying this product, any mold growth must be removed, and conditions favorable to mold growth must be identified and corrected. This product is compatible with, and may be mixed with wood preservative products containing disodium octaborate tetrahydrate (DOT). The combination of such DOT containing products with FILMGUARD IPBC 20 Fungicidal Agent may be more efficacious than FILMGUARD IPBC 20 Fungicidal Agent alone. When using a combination system, use the product at the manufacturer's labeled use rate. Always assess compatibility with the specific DOT product with which the FILMGUARD IPBC 20 Fungicidal Agent is intended to be used. When used on the interior sides of living spaces the treated surfaces must be subsequently covered with overlay materials such as wallpaper, paint, or similar coatings. Do not use on food-contact surfaces, or in the interior of buildings engaged in food processing or handling.