

464-8125

01-25-2012

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9

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

JAN 25 2012

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

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

Subject: **FILMGUARD IPBC 20 FUNGICIDAL Agent**  
EPA Registration No.: 464-8125  
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 **CONCURRENCES**

SYMBOL							
SURNAME							
DATE							

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.

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.

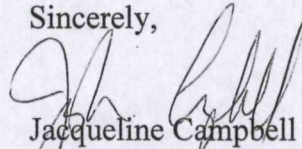
4.) Add the statement, "Do not contaminate water, food, or feed by storage or disposal," to appear immediately after the "Storage and Disposal" heading on page 2.

**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**

<b>SYMBOL</b>	<b>ENCLOSURE:</b>	<b>STAMPED LABEL</b>					
<b>SURNAME</b>							
<b>DATE</b>							

FILMGUARD IPBC 20 FUNGICIDAL AGENT

Master Label

October 19, 2011

**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 metalworking 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. XXXX-XX-X

**KEEP OUT OF REACH OF CHILDREN**

**WARNING**

FIRST AID	
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 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 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>
HOT LINE NUMBER	
<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.	
<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.	

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

JAN 25 2012

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

464-8125

**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. 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. 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.

**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 reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or, by other procedures approved by state and local authorities.

5/9

### 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.

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

#### 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 ( $500 \text{ ppm} / 0.05 = 10,000 \text{ ppm}$  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.

## FILMGUARD IPBC 20 FUNGICIDAL AGENT

Master Label

October 19, 2011

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.

### Paper Coatings

6  
9

FILMGUARD IPBC 20 FUNGICIDAL AGENT

Master Label

October 19, 2011

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 products: 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 0.1-3.75% of this product by weight. This product is added at the end of the production cycle and with good agitation to prevent possible mechanical losses and to ensure uniform distribution. As an example, to inhibit the growth of mildew on corrugated cardboard intended for non-food packaging, add 2.5% (25 lbs. FILMGUARD IPBC 20 Fungicidal Agent per 1000 lbs. of 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 for use in above ground applications. All 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 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 above ground use only.

Treating solutions are prepared by diluting this product in alcohols or aromatic solvents or by 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 one minute dip at ambient temperatures in a solution or aqueous dispersion containing 1.0% of this 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 the 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 means 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 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 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. A properly laid out yard takes

FILMGUARD IPBC 20 FUNGICIDAL AGENT

Master Label

October 19, 2011

advantage of prevailing winds to permit good air circulation. Main alleys must be at least 16 feet wide. Sufficiently elevate stack 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 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.

For applications of this type, this product is applied by dipping, brushing, spraying or pressure treatment. Use levels are in percentage by weight and refer to this product. levels of 0.5% are used for mildew control. To control rot and decay, do not use less than 1.0% as a 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 also pertains to spraying. Use of this product is not for wood surfaces which come in contact with food. Surfaces in continuous contact with skin are to be coated with a varnish or lacquer after 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, transport and processing of wet leather stock: pickled, vegetable, chrome, alternative metal, or 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 good agitation by adding one part FILMGUARD IPBC 20 Fungicidal Agent to four parts water) to treat 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% (1000-10,000 ppm) is applied with brush or roller coating process to treat the entire pallet of stacked 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 the split and shave weight of leather being processed to prevent microbial growth.

8  
9



FILMGUARD IPBC 20 FUNGICIDAL AGENT

Master Label

October 19, 2011

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).

9/9

**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 wood structural components; and wallboard, concrete masonry (including aggregate block, brick and stone) and other building materials to inhibit or prevent the growth of surface mold when the materials are subjected to moist or wet environments. Before applying this product, visible 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 protection 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 DOT 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 mixed. When used on the interior sides of living spaces the treated surfaces must be subsequently covered with overlayment 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 food handling.

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:

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