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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 26, 2004

Peni Nicholas
Regulatory Associate
Arch Chemicals, Inc.
501 Merritt 7
Norwalk, CT 06856-5204

Subject: Omacide IPBC 100
EPA Registration No. 1258-1219
Application Date: December 23, 2003
EPA Received Date: December 24, 2003

Dear Ms. Nicholas:

The following amendment, submitted under connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

Proposed Amendment

- Revised labeling

Conditions

Revise the label as follows:

1. Revise the If Swallowed section to include the statement "Do not give anything by mouth to an unconscious person."
2. Place the "Directions for Use" heading and the two sentences that following directly proceeding the "Application Instructions:"
3. Revise the Environmental Hazards Statements by changing the statement "...estuaries, oceans, or public waters..." to read "...estuaries, oceans, or other waters..." Refer to PR Notice 95-1.

CONCURRENCES							
SYMBOL	7510C						
SURNAME	S. Shaw						
DATE	2-26-04						

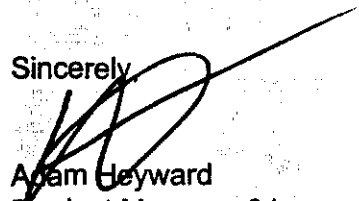
4. Place the statement "Pesticide wastes are acutely hazardous." directly following the "Pesticide Disposal" heading. Refer to PR Notice 83-3.

General Comments

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

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,


Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Do not breathe dust. . Remove clothing and wash clothing before reuse.

APPLICATORS AND OTHER HANDLERS MUST WEAR:

Goggles or face shield, coveralls worn over long sleeve shirt and long pants, chemical resistant gloves (such as Barrier Laminate, Butyl Rubber, Neoprene Rubber, Nitrile Rubber) and shoes plus socks. Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, or HE prefilter. Wash thoroughly with soap and water after handling.

FIRST AID:

IF IN EYES: 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. Call a Poison Control Center or doctor for treatment advice.

IF ON SKIN: 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 SWALLOWED: Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told by a Poison Control Center or doctor.

IF INHALED: 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.

In case of emergency call 1 800 654-6911.

Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.

Note To Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

OMACIDE® IPBC 100
Industrial Fungicide

Active Ingredient:

3-Iodo-2-propynyl butylcarbamate 97%

Inert Ingredients 3%

Total 100%

KEEP OUT OF REACH OF CHILDREN
DANGER

SEE SIDE LABEL FOR FIRST AID AND PRECAUTIONS

Net Wt. 25 LBS.

EPA Reg. No. 1258-1219

EPA Est. No. 1258-NY-3

ARCH CHEMICALS, INC.

501 MERRITT SEVEN

NEWARK, N.J. 06856

with COMMENTS

EPA Letter Dated:

FEB 26 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1258-1219

USER SAFETY RECOMMENDATIONS:

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

USERS SHOULD:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove clothing immediately if pesticide gets inside.

Then wash thoroughly and put on clean clothing.

Remove personnel protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly.

DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

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

STORAGE & DISPOSAL:

Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are acutely hazardous

PESTICIDE STORAGE: Keep container tightly closed when not in use. Do not reuse container. Do not store with strong oxidizing agents or strong (concentrated) acids.

PESTICIDE DISPOSAL: Improper disposal of excess pesticide, spray mixture, 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: Triple rinse container. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

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ENVIRONMENTAL HAZARD: This pesticide is toxic to fish. 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.

APPLICATION INSTRUCTIONS:

FOR USE AS A DRY FILM PAINT PRESERVATIVE:

This product inhibits the growth of mildew in solvent based paints and waterborne paints, stains and latex emulsions. For best results, it should be poured from the container and solubilized in a suitable solvent prior to adding to the paint. Addition should be at the end of the manufacturing process and allowed to mix long enough to be adequately dispersed. Typical levels for protection against mildew on painted surfaces are 0.1-0.5 % by weight on wet paint. For example, a house paint with a wet density of 10 lbs./gallon would use 1-5 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 0.8 % by weight on wet paint.

TO INHIBIT THE GROWTH OF FUNGI IN AQUEOUS METALWORKING, CUTTING, COOLING & LUBRICATING CONCENTRATES: add, by pouring from the container, an amount that will give up to 1000 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 100 ppm, and the end use dilution of the fluid is 5%, then a 0.2% concentration of this product is required in the concentrate ($100 \text{ ppm} / 0.05 = 2,000 \text{ ppm}$ or 0.2%).

TO INHIBIT THE GROWTH OF FUNGI IN AQUEOUS METALWORKING, CUTTING,

COOLING & LUBRICATING FLUIDS: add, by pouring from the container, up to 1000 parts per million (0.1% w/w) of this product to the diluted fluid (1.0 lbs. per 1000 lbs. of solution or approximately 0.8 lbs. per 100 gallons of solution or 1.0 kg per 1000 kg). 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.

For use as a fungicide in non-medical, non-food contact aqueous, solvent and non-solvent based systems such as natural and synthetic adhesives, caulks, patching compounds, sealants, grouts, latexes such as SBR/latex used in the manufacture of flooring adhesives or carpet backings.

OMACIDE IPBC 100 can be used as an additive to non-medical, non-food use natural and synthetic adhesives, caulks, patching compounds, sealants, grouts, lattices such as SBR/latex flooring adhesives or carpet backings to prevent the growth of fungi, molds and mildews in the material both in the wet state and in the dry film of the finished product. Recommended use levels are between 0.02 - 0.25% wet formulation weight. OMACIDE IPBC should be added toward the end of the production cycle with good agitation to ensure a uniform distribution is achieved.

For example to inhibit the growth of mildew on a latex-based wall cover adhesive intended for a non-food area add 0.2% (2 lbs. OMACIDE IPBC /1000 lbs. of latex-based adhesive formulation) of this product to the latex-based formulation.

PLASTICS AND PLASTIC COATINGS: This product may be used in to prevent surface mildew growth on plastic items such as shower curtains, cable and wire insulation, sun umbrellas, polymer furniture, filter medias, polymer components of carpet, etc. Intended plastics include polymers such as PVC, polyurethanes, elastomers and rubbers, neoprene, styrene compounds, polyolefins etc. Use levels of 0.05 - 1.0% 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. Use of this product is not recommended if the heat of processing is above 350°F for prolonged periods, nor should it be used in a plastic that will be in contact with food or medical device applications. For example to inhibit the growth of mildew on a plastic such as polyurethane boat seat cushion intended for a non-food area add 0.5% (5 lbs. OMACIDE IPBC 100 /1000 lbs. of polyurethane formulation) of this product to the polyurethane formulation.

TEXTILES: This product may be used as a mildewcide applied in both aqueous and solvent based coatings or

dyes which are typical to the textile material processing. Typical end use applications of these materials can be: carpet fibers and backings, canvas and cordage, drapes, shower curtains, etc. Not to be used in fabrics for human wear or direct skin contact. Product should 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 in the range of 0.02-1% by weight of the total processing formulation are typically adequate to prevent fungal growth. For example to inhibit the growth of mildew on cotton canvas intended for a non-food area add 0.5% (5 lbs. OMACIDE IPBC 100/1000 lbs. of dye bath) of this product to the dye bath formulation.

PAPER COATINGS: This product 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 on products such as: corrugated cardboard or soap wrappers, wallcovers, and non-food contact packaging materials, and non food contact paper tapes. Use levels of this product range from 0.02 - 0.75% of this product by weight. This product should be added at the end of the production cycle and with good agitation to prevent possible mechanical losses and ensure a uniform distribution.

For example to inhibit the growth of mildew on corrugated cardboard intended for a non-food packaging add 0.5% (5 lbs. OMACIDE IPBC 100 /1000 lbs. of coating material) of this product to the coating material formulation.

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CANVAS AND CORDAGE: This product may be used as a mildewcide in both aqueous and solvent based process formulations which coat canvas and cordage. Typical use levels of this product will range from 0.02-1% of the process formulations used in the process of these canvases and cordages. This product should be added at the end of the production cycle to the process formulation with good agitation to prevent possible mechanical losses and ensure a uniform distribution. For example to inhibit the growth of mildew on cotton canvas intended for a non-food area add 0.5% (5 lbs. OMACIDE IPBC 100 /1000 lbs. of process formulation) of this product to the process formulation.

INKS: This product may be used in aqueous based ink solutions for protection of these solutions against attack of fungal organisms. It is recommended that this product be added at the end of the product cycle with good agitation. This product will generally impart protection when used at levels of .05 - 3% based on the formula weight.

Wood Preservation OMACIDE® IPBC Powder Use Directions

This product is a white powder, non-metallic compound designed for use as a wood preservative for use in above ground applications.

All recommendations of 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 should be determined by field trials.

WOOD: For best results this product should be solubilized in a suitable solvent or made into an aqueous dispersions and then applied to new lumber, plywood, particle board, millwork, etc., to prevent the growth of mildew, sapstain and wood rot on these substrates. This product is recommended for use on wood in above ground use only.

Treating solutions may be prepared by dissolving this product in alcohols or aromatic solvents or by dispersion in water. Levels of 0.10% - 1.5% 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 0.20% of this product is suggested as a starting level. A one minute dip at ambient temperatures in a solution or aqueous dispersion containing 0.20% of this product should be 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 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.

For best results, lumber should be treated 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.

After treatment, lumber should be stacked in a properly maintained seasoning yard with good drainage so that no water will accumulate in any area. The yard should be kept free from weeds and vegetation which may hold moisture and promote growth of decay and stain producing fungi. All debris and lumber scraps should be removed from the area.

A properly laid out yard should take advantage of prevailing winds to permit good air circulation. Main alleys should be at least 16 feet wide. Stack foundations should be sufficiently elevated to permit ready access of air to the pile, and allow water to drain off quickly.

This product is also recommended 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 once in solution may be applied by dipping, brushing or spraying. Levels of 0.15% may be used for mildew control.

To control rot and decay, do not use less than 0.2% as a concentration. Use this product in solution in a suitable solvent. Concentrations up to 1.0% are recommended

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 recommended 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. It is recommended that levels between .2% - 1% of this product by weight of the final formulation be added to these materials.

Our technical services personnel are always available to assist in determining optimum levels for specific systems in any type of application.