UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



JUN 2 5 2002

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Ms.Geraldine W. Werdig
Pesticide Registraiton Associates, D.C.
Manager, Regulatory Affairs Agent for
Arch Chemicals, Inc.
715 Eighth Street, S.E., Suite 3
Washington, DC 20003

Subject:

Revised label in response to EPA Letter

Omacide® IPBC 20

EPA Registration No. 1258-1222 Letter Dated June 11, 2002

Dear Ms. Werdig:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

A stamped copy is enclosed for your records.

Should you have any questions concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,

Adam Heyward

Product Manager (34)

Regulatory Management Branch II Antimicrobials Division (7510C)

Enclosure

OMACIDE® IPBC 20

Industrial Fungicide

Active Ingredient:

3-lodo-2-propynyl butylcarbamate

20%

Inert Ingredients

80%

Total

100%

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE SIDE LABEL TAODICORAP TED PRECAUTIONARY STATEMENTS

JUN 25 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the Net Wa posticity projectered under

EPA Reg. No. 1258-1222

EPA Est. No. 1258-NY-3

ARCH CHEMICALS, INC.

501 MERRITT SEVEN

NORWALK, CT. 06856

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eve damage. May be fatal if inhaled. Causes skin irritation. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Do not breathe vapor or spray mist. Wear goggles, face shield or safety glasses. Wear a mask or pesticide respirator jointly approved by the Mine Safety Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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 OR CLOTHING: Tale off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for further treatment advice.

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

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.

- * In case of emergency call toll free 1-800-654-6911
- * Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARD: This pesticide is toxic to fish and aquatic organisms. 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.

STORAGE & DISPOSAL:

Do not contaminate water, food or feed by storage or disposal.

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: Pesticide wastes are acutely hazardous. 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 (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or incinerator 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.

TO INHIBIT THE GROWTH OF MILDEW ON PAINTS & STAINS: This product, used in solvent and waterborne paints and stains will inhibit the growth of mildew. Addition should be at the end of the manufacturing process and allowed to mix long enough to be adequately dispersed and should not be added to hot paint. Typical levels for protection against mildew on painted or stained surfaces are 0.5-2.4 % by weight on wet paint. For example, a house paint with a wet density of 10 lbs/gallon would use 5.0-24.0 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 4.0 % by weight on wet paint. For interior paint use, approximately half the exterior concentrations should be used, 0.2% to 1.2% by weight on wet paint. Appropriate levels are best determined by field trials.

TO INHIBIT THE GROWTH OF FUNGI IN AQUEOUS METALWORKING, CUTTING, COOLING & LUBRICATING

CONCENTRATES: add an amount that will give up to 5000 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%).

TO INHIBIT THE GROWTH OF FUNCI IN AQUEOUS METALWORKING, CUTTING, COOLING & LUBRICATING FLUIDS: add up to 5000 parts per million (0.5% v/v) of this product to the diluted fluid (0.5 gallons per 100 gallons of solution or 5.0 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 ensur. ...ixing.

ADHESIVES: This product 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. Recommended use levels are between 0.1 - 1.25% wet formulation weight. This product should be added, by pouring from the container, 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 1.0% (10 lbs. of this product /1000 lbs. of latex based adhesive formulation) of this product to the latex based formulation.

TO INHIBIT THE GROWTH OF MILDEW ON PAINTS & STAINS: This product, used in solvent and waterborne paints and stains will inhibit the growth of mildew. Addition, by pouring from the container, should be at the end of the manufacturing process and allowed to mix long enough to be adequately dispersed and should not be added to hot paint. Typical levels for protection against mildew on painted or stained surfaces are 0.5-2.4 % by weight on wet paint. For example, a house paint with a wet density of 10 lbs/gallon would use 5.0-24.0 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 4.0 % by weight on wet paint. For interior paint use, approximately half the exterior concentrations should be used, 0.2% to 1.2% by weight on wet paint. Appropriate levels are best determined by field trials.

WOOD PRESERVATION: This product is a liquid 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.

This product 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 recommended 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 0.5% - 6.0% 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 1.0% of this product is suggested as a starting level. A one minute dip at ambient temperatures in a solution or aqueous dispersion containing 1.0% 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

 $\underline{\omega}$

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 may be applied by dipping, brushing or spraying. Levels of 0.50% may be 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 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 fccd.

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 1.0% - 4.0% 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.

PLASTIC 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, and sun umbrellas. Intended plastics include polymers such as PVC. Use levels of 1.5 - 5.0% by weight of the plastic are generally adequate. This product should be poured from the container and dispersed in the plasticizer 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.

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 poured from the container and solublized 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 0.1-5% by weight of the total processing formulation are typically adequate to prevent fungal growth.

Example

For example to inhibit the growth of mildew on cotton canvas intended for a non-food area add 2.5% (25 lbs. OMACIDE IPBC 20 /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, wall covers, and 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 should be added at the end of the production cycle, by pouring from the container, with good agitation to prevent possible mechanical losses and ensure a uniform distribution.

Example

For example to inhibit the growth of mildew on corrugated cardboard intended for a non-food packaging add 2.5% (25 lbs. OMACIDE IPBC 20 /1000 lbs. of coating material) of this product to the coating material formulation.

CANVAS & CORDAGE: This product can 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 0.1-5% 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, by pouring from the container, with good agitation to prevent possible mechanical losses and to ensure a uniform distribution.

Example

For example to inhibit the growth of mildew on cotton canvas intended for a non-food area add 2.5% (25 lbs. OMACIDE IPBC 20/1000 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, by pouring from the container, 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.