OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

October 4, 2023

Tara Conley
Director
Promchemie AG
Electronic Transmittal: tconley@prombiocides.com

Subject: Notification per PRN 98-10 – Add new establishment number
Product Name: BROMOTOP-99
EPA Registration Number: 80285-14
Received Date: December 19, 2022
Action Case Number: 00417829

Dear Tara:

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) lists 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 Assurance.

If you have any questions, please contact Zebora Johnson at (202-566-0730) or by email at johnson.zebora@epa.gov.

Sincerely,

zebora Johnson

For

Steven Snyderman, Product Manager 33
Regulatory Management Branch II
Antimicrobials Division (7510M

PROMEX™ BNP 99

THIS PRODUCT IS A MICROBIOCIDE FOR USE IN CONTROLLING THE GROWTH OF BACTERIA AND ALGAE IN INDUSTRIAL APPLICATIONS AND AS A PRESERVATIVE TO INHIBIT BACTERIAL SPOILAGE DURING MANUFACTURE, DISTRIBUTION, USE AND STORAGE OF INDUSTRIAL, HOUSEHOLD, AND INSTITUTIONAL PRODUCTS. THE FOLLOWING APPLICATIONS ARE NOT APPROVED IN THE STATE OF CALIFORNIA: WATER-BASED PRINTING INKS AND FOUNTAIN SOLUTIONS, STARCH, PIGMENT, EXTENDER SLURRIES, MINERAL SLURRIES, CONSUMER, HOUSEHOLD, AND INSTITUTIONAL PRODUCT; SURFACTANTS AND RAW MATERIALS, HIDES AND SKINS, AND LEATHER.

Manufactured for:
PromChemie AG
Austrasse 79, P.O. Box 26
FL-9490 Vaduz, Liechtenstein
Telephone (Int'l): +(011) 423-236-1818
(US): (508) 850-5253
EPA Reg. No. 80285-14
EPA Est. No. 82522-GA-3

NET WEIGHT _____LBS

LOT / BATCH

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE. Causes irreversible eye damage. Fatal if absorbed through the skin. May be fatal if swallowed. Harmful if inhaled. Causes skin irritation. Do not get in eyes, on skin or on clothing. Avoid breathing dust. Wear goggles and chemical resistant rubber gloves. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

Avoid contact with metal equipment such as scoops, mills and sieves. Reacts with oxidizing agents.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans, or other water 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 sewage treatment plant 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 and disposal.
PESTICIDE STORAGE: Product must be stored in an area that is not subject to extreme temperatures. Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed.
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 HANDLING: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available.

WARRANTY

Seller warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with label directions under normal conditions of use, but to the extent consistent with applicable law, neither this warranty nor any other warranty of MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, expressed or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to Seller, and Buyer assumes the risk of any such use.

ACTIVE INGREDIENT:
2-Bromo-2-nitropropane-1,3-diol.....99.9%
OTHER INGREDIENTS.....0.1%
TOTAL 100%

KEEP OUT OF REACH OF CHILDREN

DANGER

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 eye. • Call a poison control center or doctor for treatment advice
IF ON SKIN OR CLOTHING	• 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 to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. **YOU MAY ALSO CONTACT 1-888-875-1685 FOR EMERGENCY MEDICAL TREATMENT INFORMATION**	
NOTE TO PHYSICIAN: Possible mucosal damage may contraindicate the use of gastric lavage	

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. **Read the entire label and use strictly in accordance with precautionary statements and directions.**

To control the growth of slime-forming, spoilage, odor-causing and corrosion inducing bacteria and algae in industrial applications. NOT FOR CONTROL OF ALGAE IN THE STATE OF CALIFORNIA.

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS AND EVAPORATE CONDENSERS
To control slime-forming bacteria and algae in industrial recirculation cooling towers and evaporative condensers, this product must be added as the solid directly into the sump or basin or it must be added to the cooling water return at a suitable point. This product must be added at a point where there is adequate flow or turbulence to ensure quick dissolution (e.g. the pump outlet from the tower sump).
Frequency and Dose: This product must be slug-dosed once or twice weekly as a normal routine. Where contamination is heavy, more frequent dosing must be required. This product must be shock-dosed at between 0.21 – 0.84 lbs./1,000 gallons depending on the condition of the tower, the quality of the raw water input, and the amount of bleed off.

PRODUCED WATER
To inhibit the growth of slime-forming or corrosion-inducing sulfate-reducing bacteria in formation water produced by wells together with oils or gas, this product must be used as the solid or pre-dissolved in a quantity of warm water or alcohol, then injected into the water-containing oil or gas stream at any convenient point. It must be injected as slug doses, not as a continuous feed.
Frequency and Dose: Depending on severity and rapidity of contamination, this product must be slug-dosed from once a week to once a month with 0.018 – 0.036 lbs. per barrel.]

INDUSTRAL PROCESS WATER
Use this product to effectively control bacterial and algal growth in industrial process water, including closed circuit machine cooling (injection molding, etc.) and stored (non-potable) water, as well as to reduce the biofouling of pipework, heat exchanges, condenser tubes, and to minimize microbially produced corrosion. Dosing must be carried out into the sump/tank of the process water system. Shock dosing is preferred. It is not required to dilute this product prior to dosing. This product must also be used as an intermittent, flush treatment during regular maintenance cleaning of tank and equipment.
Frequency and Dose: In open systems, shock dosing must be carried out on a once weekly to once monthly basis depending on the degree of contamination. In closed circuit systems, less frequent dosing (once or twice monthly) would be sufficient. Dosing must be carried out to give an initial concentration of 50 ppm (0.42 lbs./1,000 gallons). When the above treatment has been successful, dosing can be lowered to a minimum of 10 ppm of this product (0.08 lbs./1,000 gallons).
For intermittent treatment of industrial process waters during routine maintenance, this product must be used at 100 ppm (0.84 lbs./1,000 gallons) and a contact time of at least one hour.

DRILLING FLUIDS AND WORKOVER AND COMPLETION FLUIDS
To inhibit growth of cellulolytic, slime-forming or sulfate-reducing bacteria in oil and gas well drilling muds and brines, this product must be used as the solid or pre-dissolved into a quantity of warm water, then dose directly into the mud or brine.
Frequency and Dose: A single slug dose one to three times each 24 hours. Dosing must be less frequent where the contamination is low. Each slug dose must be 0.018 – 0.036 lbs. per barrel total mud volume.

WATERFLOOD
To inhibit the growth of anaerobic and aerobic bacteria in all waterflood base fluids used in recovery of oil and gas reservoirs, add this product as a dry product or pre-dissolve in any base fluid, or inject directly at the well head.
Frequency and Dose: This product must be added continuously to waterflood fluids or slug-dosed, depending on the bottom hold temperature and fluid chemistry at the rate of 25 – 100 ppm (0.009 – 0.036 lbs. per barrel) depending on the quality of the base fluid.

INJECTION FLUIDS
For the control of contamination and corrosion from bacterial sources in fluids/waste fluids that are disposed of through injection into an approved well following approved guidelines, add this product as a dry product or pre-dissolve in each volume of fluid prior to injection.
Frequency and Dose: This product must be added at a rate of 50 – 100 ppm (0.018 – 0.036 lbs. per barrel) based on the water percent of the injection fluid.

ENHANCED OIL RECOVERY (EOR) FLUIDS
For the effective control of bacterial growth and eliminating degradation of EOR gels and fluids used in the oil and gas industry, add this product during mixing as a dry product or pre-dissolve and add by injecting during the EOR process.
Frequency and Dose: This product must be added throughout the EOR operation at the rate of 50 – 100 ppm (0.018 – 0.036 lbs. per barrel) depending on the quality of the makeup water.

WELL SQUEEZE FLUIDS
For the effective control of aerobic and anaerobic bacteria in squeeze fluids and downhole well bore area, add this product during pre-mixing of the well squeeze fluid or (in the case of direct injection systems) create an aqueous solution that must be added by direction injection at the well head during the well squeeze procedure.
Frequency and Dose: This product must be used for each well squeeze operation to ensure best results. Add this product at a rate of 0.21 – 1.68 lbs./1,000 gallons, depending on the quality of the makeup water.

FRACTURING FLUIDS
This product must be added during pre-mixing of the fracturing fluid or (in the case of direction mix injection systems) create an aqueous solution that must be added by direction injections of the head during the fracturing procedure. This product reduces bacterial contamination and degradation of fracturing gels and fluids used as well stimulants in the oil and gas industry.
Frequency and Dose: This product must be used for each fracturing operation for best results. This product must be added at a rate of 0.42 – 0.84 lbs./1,000 gallons depending on the quality of the makeup water.

PAPER MILL PROCESS WATER
To control slime-forming bacteria in paper or paperboard process water systems, this product must be dosed as the solid at a convenient point early in the process system. Suitable dosing points are the machine chest constant head box or backwater loop system.
Frequency and Dose: This product must be shock-dosed once, twice, or three times daily in quantities sufficient to meet the required dose based on the daily production of finished products. Dose between 0.02 – 0.5 lbs. of this product per ton of finished paper or paperboard depending on the complexity of the system, quality of the raw paper, and the type and degree of contamination.

PAPER MILLS-BULK PULP
To preserve bulk quantities of pulp in paper and paperboard manufacturing systems or to prevent foul odors and general biodeterioration of stock when it is stored in bulk for any significant period of time, add this product as the solid or pre-dissolve in a quantity of warm water, then dose directly into the hydropulper, machine chest, or stock chest.
Frequency and Dose: In general, a single slug dose will provide protection for up to 3 days or longer depending upon the initial level of contamination in the stock. In situations where contamination is high, repeat dosing every 1 – 7 days as required. This product must be dosed at between 0.09 – 0.44 lbs. per ton of stock (0.42 – 1.7 lbs./1,000 gallons) depending on the type and degree of contamination.

ABSORBENT CLAYS, CORN COBS, AND GROUND WOOD
Impregnate absorbent clays, corn cobs, or ground wood with this product to inhibit the growth of odor-causing bacteria. The required application rate is 25 – 200 ppm (0.04 – 0.32 oz. av. per 100 lbs. of absorbent material).

CONCRETE ADMIXTURES
For the preservation of concrete admixtures based on polycarboxylates, lignosulphonates, naphtaline sulphonates, melamine sulphonates, and other systems.
Add this product at 250-2,500 ppm based upon the final formulation volume (2.2 – 22.1 lbs./1,000 gallons).

WATER-BASED PRINTING INKS AND FOUNTAIN SOLUTIONS
NOT APPROVED FOR THIS USE IN THE STATE OF CALIFORNIA
During the use of fountain solutions, shock dose with this product at 167-333 ppm (1.48-2.95 lbs./1,000 gallons) depending on the contamination. Apply once weekly in the fountain reservoir as a normal routine or more frequently, if required. For In-Can preservations dose this product at 333-1,667 ppm based on the final formulation volume (2.95-14.75 lbs./1,000 gallons).

ADHESIVES
For in-can preservation of water-based adhesives and mastics incorporating acrylate and other polymer dispersions as 0.1 – 0.5 lbs. of this product per 100 lbs. total formulation weight to any water to be incorporated into the formulation.

STARCH, PIGMENT, AND EXTENDER SLURRIES
NOT APPROVED FOR USE IN PIGMENTS IN THE STATE OF CALIFORNIA
For in-can preservation apply this product to water based solutions of starch or pigments and extender slurries such as kaolin, calcium carbonate and titanium dioxide. Recommended use rates are 0.89-4.42 lbs./1,000 gallons based on the final formulation volume (100-500 ppm active ingredient).

MINERAL SLURRIES
NOT APPROVED FOR THIS USE IN THE STATE OF CALIFORNIA
For the control of microbial contamination in mineral slurries, the recommended use rates of this product are 117-1,667 ppm (1.04-14.75 lbs./1,000 gallons) based on the final formulation volume.

PAINTS AND OTHER EMULSIONS SYSTEMS
For the preservations of acrylic, styrene-acrylic, polyvinyl acetate and other latex emulsions, latex emulsion based paints, photographic emulsions, silicone and other antifoam emulsion systems.
Add this product at 333-1,667 ppm based upon the final formulation volume (2.95-14.75 lbs./1,000 gallons).

CONSUMER, HOUSEHOLD, AND INSTITUTIONAL PRODUCT; SURFACTANTS AND RAW MATERIALS
NOT APPROVED FOR THIS USE IN THE STATE OF CALIFORNIA
For preservation of products such as dishwashing liquids, surface cleaners, polishes; bulk ionic, nonionic, amphoteric and cationic surfactants and raw materials supplied to the manufacturer of industrial and consumer products, this product should be dosed at 333-1,667 ppm (2.95-14.75 lbs./1,000 gallons) based on the final formulation volume.

HIDES AND SKINS
NOT APPROVED FOR THIS USE IN THE STATE OF CALIFORNIA

This product is used to prevent bacterial decomposition of hides and skins. When the product is used for temporary preservation, it is applied at 0.1 – 1.0% (1,000-10,000 ppm) based on the weight of green fleshed hides and skins. The specific dosage and contact time will be dependent on the condition of the hides and the desired length of preservation. When used for preservation in the brine of hides/skins, this product should be used at a level of 0.005 – 0.5% (50-5,000 ppm) in a raceway or at 0.005 – 0.5% (50- 5,000 ppm) in a mixer based on the total weight of hides and skins and saturated brine solution. In raceway operations it can be added directly to the raceway during the addition of hides and operation of paddles. In processor/mixer operation the product should be added as dispersion in water. A satisfactory dispersion of 1 part of this product plus 4 parts water can be prepared by adding this product to the water (as opposed to adding water to this product) with agitation

LEATHER

NOT APPROVED FOR THIS USE IN THE STATE OF CALIFORNIA

This product can be used to prevent bacterial decomposition of brine-cured, wet-salted, air-dried, or green fleshed hides and skins in the soaking process. For this purpose, this product can be used at treatment levels of 0.005 – 0.3% (50-3,000 ppm) based on the weight on the hides/skins and process water (float) and added as dilution in water. A satisfactory dilution of 1 part of this product plus 9 parts water can be prepared by adding this product to the water (as opposed to adding water to this product) with agitation. This dilution should be made immediately prior to use in the soaking process and added directly to the soak tank, paddles, mixers, or drums as suitable

GENERAL PRESERVATION

For the preservation of uses (Adhesives, Construction products-cementitious and polymeric admixtures, drilling additives, joint cements, pigment dispersions, asphalt emulsions, and resin emulsions for non-residential use) use levels based on the total weight of the formulation. This product should be added to the latter phase of the manufacturing process. It should not be exposed to temperatures exceeding 125°F (52°C) for prolonged periods of time. Further it is not suitable for systems with a pH below 7. This product may also be used to control microbial growth at the air-water interface of paint manufacturing raw material storage tanks. An aqueous solution of this product may be sprayed over the surface. Care should be taken to avoid removal of this interface in paint production. NOTE: May cause discoloration. Color stability in systems should be checked before use.

For general preservation application, this product should be dosed at 333-1,667 ppm based on the final formulation volume (2.95-14.75 lbs./1,000 gallons). For difficult to preserve formulations such as adhesives and those containing naturally derived ingredients, doses up to 3,333 ppm (29.48 lbs./1,000 gallons) may be required.