



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 27, 2007

Rhonda Vance-Moeser
The Dow Chemical Company
1691 North Swede Road
Midland, MI 48674

Subject: **DBNPA 100 Powder**
EPA Registration No.: 464-389
Application Date: February 6, 2007
Receipt Date: February 15, 2007

Dear Ms. Vance-Moeser:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c) 9.

Proposed Notification:

- Revise Warranty Statement: change "the" to "its" in the statement "It is a violation of Federal Law to use this product in a manner inconsistent with its labeling."

General Comment:

Based on a review of the material submitted, the following comment applies:

A copy of the accepted notification has been added to your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Stacey Grigsby at (703) 305-6440.

Sincerely,

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



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 464-389	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow Chemical / DBNPA 100 Powder	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

Amendment - Explain below. Final printed labels in response to Agency letter dated _____

Resubmission in response to Agency letter dated _____ "Me Too" Application.

Notification - Explain below. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to
 1) revise warranty statement
 2) change "the" to "its" in the statement "It is a violation of Federal Law to use this product in a manner inconsistent with its labeling."
 Mandatory notification statement is contained in cover letter which is enclosed.

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" 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
20 lbs / 50 lbs / 100 lbs / 3 & 1 lb

5. Location of Label Directions

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 Rhonda Vance-Moeser	Title Senior Regulatory Specialist	Telephone No. (Include Area Code) (989) 636-1894
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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.

2. Signature <i>Rhonda Vance-Moeser</i>	3. Title Senior Regulatory Specialist	6. Date Application Received (Stamped)
4. Typed Name Rhonda Vance-Moeser	5. Date 2/6/07	

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3/6



The Dow Chemical Company
Midland, Michigan 48674

February 6, 2007

Overnight Mail

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

RE: NOTIFICATION – DBNPA 100 Powder - EPA REG. NO. 464 – 389

The Dow Chemical Company (Dow) hereby submits a Notification application to:

- 1) Revise the warranty language on the label to the following:
"Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY."

- 2) Change "the" to "its" in the following statement:
"It is a violation of Federal Law to use this product in a manner inconsistent with its labeling"

In order for the application to be processed the required Notification statement is included.

"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 enforcement action and penalties under section 12 and 14 of FIFRA"

Enclosed are the following documents to support this notification

- 1) Completed application for Pesticide Registration, Form 8570-1
- 2) Required notification statement above
- 3) Two copies of product label with one indicating changes highlighted in yellow.

Please contact me if you have any questions or need additional information.

Sincerely,

Rhonda Vance-Moeser
Senior Regulatory Specialist
1691 North Swede Road, Midland, MI 48674
Phone: (989) 636-1884
e-mail: rgvmoeser@dow.com

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Enclosures

4/6

DBNPA 100 POWDER

Active Ingredient(s):
 2,2-Dibromo-3-nitrilopropionamide...97.6%
 Inert Ingredient(s):2.4%
 Total100%
 E.P.A. Registration No. 464-389
 E.P.A. Est. No. 37429-GA-2

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

DANGER

CORROSIVE • CAUSES IRREVERSIBLE EYE DAMAGE • MAY BE FATAL IF SWALLOWED • CAUSES SKIN IRRITATION • HARMFUL IF ABSORBED THROUGH SKIN

Do Not Get In Eyes, On Skin, Or On Clothing • Chemical Worker's Goggles Must Be Worn When Handling • Wash Thoroughly With Soap And Water After Handling • Remove Contaminated Clothing and Wash Before Reuse • Avoid Breathing Dust • Use With Adequate Ventilation

Produced for:



THE DOW CHEMICAL COMPANY

Midland, Michigan 48674 U.S.A.

(989)636-4400

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

Made in China

FIRST AID:	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for • Remove contact lenses, if present, after the first 5 minutes • Call a poison control center or doctor (preferably an ophthalmologist)
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 30 minutes • Call a poison control center or doctor for treatment advice
IF SWALLOWED	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice • Have a person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center • Never give anything by mouth to an unconscious person
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then preferably mouth-to-mouth. • Call a poison control center or doctor for treatment advice
HOT LINE NUMBER	
IN CASE OF AN EMERGENCY endangering life or property involving this product. Have the product container or label with you when calling a poison control center or	

ENVIRONMENTAL HAZARDS

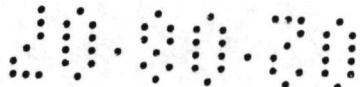
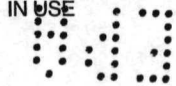
This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PESTICIDE STORAGE AND DISPOSAL

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

Pesticide Storage: To maintain product quality, store at temperatures below 60°C.

KEEP CONTAINER TIGHTLY CLOSED WHEN NOT IN USE



Pesticide Disposal:

hazardous. Improper spray mixture, or rinsate these wastes cannot be label instructions, contact Environmental Control representative at the nearest guidance.

Container Disposal:

Dispose of container in incineration, or if allowed by burning. If burned,



NET WT:

LOT
 53392-2/6/2007-1930

NOTIFICATION
 Date Reviewed: 2-15-07
 Reviewed By: S. Rigby

100 POWDER

FIRST AID:

IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 30 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor (preferably an ophthalmologist) for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 30 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have a 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. • Never give anything by mouth to an unconscious person.
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth. • Call a poison control center or doctor for treatment advice.

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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PESTICIDE STORAGE AND DISPOSAL

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

Pesticide Storage: To maintain product quality, store at temperatures below 60°C.

KEEP CONTAINER TIGHTLY CLOSED WHEN NOT IN USE

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: Do not reuse empty container. Dispose of container in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.



NOTICE

Do Not Ship or Store with Food, Feeds, Drugs, or Clothing

NET WT:

LOT

53392-2/6/2007-1930

Notice: Seller warrants the chemical description of the product and the fit for the purposes stated in strict accordance with the label. NO OTHER EXPRESS WARRANTY.

DIRECTIONS FOR USE
It is a violation of Federal Law inconsistent with its labeling. NOTE: ADD SOLUTIONS OR SEPARATELY TO THE SYSTEM OF OTHER ADDITIVES, IN OR WITH DBNPA 100 POWDER D ADDITIVE FORMULATIONS PAPER MILLS

For the control of bacterial, fur, paper, and paperboard mills, add POWDER at the rate of 0.03-4 pulp or paper (dry basis). Add intermittent, depending upon the contamination. It should be in a location that will insure uniform POWDER in the mass of fiber jordan inlet or discharge, brook and white-water tanks.

HEAVILY FOULED SYSTEM with 0.03-0.07 lb. DBNPA 100 as necessary for control. **MODERATELY FOULED SYSTEM** continuously with 0.07-0.10 lb (dry basis) until the slime accretions can then be reduced to (POWDER/ton of paper, on a dry basis) needed for control. Dislodge paper and a clean-up of the system. **SLIGHTLY FOULED SYSTEM** with 0.03-0.07 lb. DBNPA 100 until slime is controlled, then maintain control.

COOLING TOWERS
For control of bacterial growth (DBNPA 100 POWDER to the uniform mixing). Add 0.002-0.005 gallons of water in the system contamination. Addition should be continuous or intermittent contamination when treating the system.

NOTIFICATION
Date Reviewed: 2-15-07
Reviewed By: S. Riggsby

minutes.
 , then continue rinsing eye.
 (Immunologist) for treatment advice.

ent advice.

control center or doctor.

ive artificial respiration,

ct, call collect (989)636-4400.
 doctor or going for treatment.

esticide wastes are acutely
 posal of excess pesticide,
 s a violation of Federal Law. If
 isposed of by use according to
 your State Pesticide or
 ency, or the Hazardous Waste
 est EPA Regional Office for

o not reuse empty container.
 sanitary landfill or by
 by state and local authorities,
 y out of smoke.

TICE
 Not Ship or Store with Food,
 ds, Drugs, or Clothing

Notice: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. **SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.**

DIRECTIONS FOR USE
 It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

NOTE: ADD SOLUTIONS OF DBNPA 100 POWDER SEPARATELY TO THE SYSTEM. DO NOT MIX THEM WITH OTHER ADDITIVES, IN ORDER TO AVOID DECOMPOSITION OF DBNPA 100 POWDER DUE TO THE HIGH pH OF MANY ADDITIVE FORMULATIONS.

PAPER MILLS
 For the control of bacterial, fungal, and yeast growths in pulp, paper, and paperboard mills, add a solution of DBNPA 100 POWDER at the rate of 0.03-0.10 lb. DBNPA 100 POWDER/ton of pulp or paper (dry basis). Addition may be continuous or intermittent, depending upon the type of system and the severity of contamination. It should be made with a metering pump at a location that will insure uniform distribution of DBNPA 100 POWDER in the mass of fiber and water, such as the beaters, jordan inlet or discharge, broke chests, furnish chests, save-alls, and white-water tanks.

HEAVILY FOULED SYSTEMS should be boiled out, then treated with 0.03-0.07 lb. DBNPA 100 POWDER/ton of paper (dry basis), as necessary for control.

MODERATELY FOULED SYSTEMS should be treated continuously with 0.07-0.10 lb. DBNPA 100 POWDER/ton of paper (dry basis) until the slime accumulation is controlled. Addition rates can then be reduced to 0.03-0.07 lb. DBNPA 100 POWDER/ton of paper, on a continuous or intermittent basis, as needed for control. Dislodged slime may cause breaks in the paper and a clean-up of the paper machine may be advisable.

SLIGHTLY FOULED SYSTEMS should be treated continuously with 0.03-0.07 lb. DBNPA 100 POWDER/ton of paper (dry basis) until slime is controlled, then added on an intermittent basis to maintain control.

COOLING TOWERS
 For control of bacterial growths in cooling towers, add solutions of DBNPA 100 POWDER to the basin (or at any other point of uniform mixing). Add 0.002-.020 lb DBNPA 100 POWDER/1,000 gallons of water in the system, depending on the severity of contamination. Addition should be made with a metering pump; it may be continuous or intermittent, depending on the severity of the contamination when treatment is begun, and the retention time in the system.

INTERMITTENT or SLUG METHOD
INITIAL DOSE: When the system is noticeably fouled, add 0.01-0.02 lb. DBNPA 100 POWDER/1,000 gallons of water in the system. Repeat until control is achieved.

SUBSEQUENT DOSES: When microbial control is evident, add 0.005-0.02 lb. DBNPA 100 POWDER/1,000 gallons of water in the system every 4 days, or as needed to maintain control.

BADLY FOULED SYSTEMS must be cleaned before treatment.

CONTINUOUS FEED METHOD
INITIAL DOSE: When the system is noticeably fouled, add 0.01-0.02 lb. of DBNPA 100 POWDER/1,000 gallons of water in the system. Subsequently, maintain this treatment level by pumping a continuous feed of 0.001-0.010 lb. DBNPA 100 POWDER/1,000 gallons of water lost by blowdown.

BADLY FOULED SYSTEMS must be cleaned before treatment is begun.

Optimum performance with this product is attained by continuous or intermittent treatment. If "shock" treatment is used, the blowdown should be discontinued for 24-48 hours.

OIL FIELD APPLICATIONS
 For reduction of bacterial contamination and degradation in oil recovery operations, add DBNPA 100 POWDER to the system at a rate of 6 to 54 ppm.

FRACTURING FLUIDS
 DBNPA 100 POWDER reduces bacterial contamination and degradation of fracturing fluids and gels used in oil and gas well stimulations. DBNPA 100 POWDER should be added to the water storage tanks before gelling and circulated to ensure mixing. DBNPA 100 POWDER can be pre-dissolved in warm water and added at the well head for "on-the-fly" fracturing jobs. Use all pre-dissolved liquid within 24 hours. Frequency and Dose: DBNPA 100 POWDER should be added at a rate of 18 to 54 ppm (0.15-0.45 lbs./1,000 gallons) depending on water quality. Retreat after 48 hours if the frac job is delayed.

ENHANCED OIL RECOVERY (EOR) FLUIDS
 DBNPA 100 POWDER reduces bacteria contamination and degradation of EOR polymers and gels. DBNPA 100 POWDER should be added to injection water before polymer addition. Frequency and Dose: DBNPA 100 POWDER should be added at a rate of 6 to 54 ppm (0.05-0.45 lbs./1,000 gallons). Dry DBNPA 100 POWDER should be added at a point to ensure proper dissolution and mixing.

WATERFLOOD
 DBNPA 100 POWDER can be used to control slime and corrosion causing bacteria in waters used for secondary oil and gas recovery. DBNPA 100 POWDER can be added as a dry product or pre-dissolved in warm water. Use all pre-dissolved liquid within 24 hours. If the system is heavily fouled, slug treat at the higher rate to remove biofilm. For maintenance, batch treat two to three times per week. Frequency and Dose: DBNPA 100 POWDER should be added at a rate of 6 to 54 ppm (0.05-0.45 lbs./1,000 gallons). Dry DBNPA 100 POWDER should be added at a point to ensure proper dissolution and mixing.

