

464-389

06-15-2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JUN 15 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Rhonda Vance-Moeser
Senior Regulatory Specialist
The Dow Chemical Company
1803 Building
Midland, MI 48674

Subject: **DBNPA 100 Powder**
EPA Registration No. 464-389
Application Date: March 17, 2009
Receipt Date: March 18, 2009

Dear Ms. Vance-Moeser:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable with comments.

Proposed Amendment:

- Revised labeling per Agency's letter dated December 11, 2008
- Revised Storage and Handling per PR Notice 2007-4

Reorder the First Aid Statement to read as follows:

IF IN EYES
IF ON SKIN OR CLOTHING
IF SWALLOWED
IF INHALED

General Comment:

A stamped copy of the accepted label with comments has been inserted in your file for future reference. Submit one copy of your final printed label distributing or selling the product bearing the revised labeling.

Should you have any questions concerning this letter, you may contact me by telephone at (703) 308-6415 or by e-mail at lantz.tracy@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by email at grigsby.stacey@epamail.epa.gov during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Tracy Lantz
CONCURRENCE (Acting) Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

SYMBOL						
SURNAME						
DATE	Enclosures: Stamped Label					

DBNPA 100 Powder
FINAL DRAFT LABEL
March, 2009

ACCEPTED
with **COMMENTS**
EPA Letter Dated:

JUN 15 2009

MASTER LABEL

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 464-389

DBNPA 100 Powder

In Water-Soluble Bags - (option for powder supplied in water soluble packaging)

FOR INDUSTRIAL USE ONLY

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. XXX-XX-XX

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER

CORROSIVE • Causes irreversible eye damage • May be fatal if inhaled or swallowed •
Causes skin irritation • Do Not Get In Eyes, on Skin, or on Clothing • Do not breathe
dust • When loading or handling wear protective eyewear (goggles or face shield), long-sleeved
shirt and long pants, socks, shoes, chemically resistant gloves and a NIOSH approved
respirator • Prolonged or frequently repeated skin contact may cause allergic reactions in some
individuals • Wash thoroughly with soap and water after handling and before eating, drinking,
chewing gum, or using tobacco • Remove and wash contaminated clothing separately from other
laundry before reuse.

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Personal Protective Equipment

Applicators and other handlers must wear:

- coveralls, over long-sleeved shirt and long pants
- socks and chemical resistance footwear
- goggles or face shields
- chemical-resistant gloves (such as barrier, laminate, butyl nitrile/neoprene rubber, PVC or viton)

Engineering Controls

When handlers use closed metering systems the handler requirements may be reduced or modified to long-sleeve shirt, long pants, shoes and socks.

User Safety Requirements

Follow manufacturers' 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.

User Safety Recommendations

Users must wash hands before eating, drinking, chewing gum, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Application Restrictions

Do not apply this product directly in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

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 poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air • If person is not breathing, call an emergency responder or an ambulance, then give artificial respiration, preferably mouth-to-mouth. • Call a poison control center or doctor for further treatment advice
IF SWALLOWED	<ul style="list-style-type: none"> • Call 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 a poison control center or doctor • Do not give anything by mouth to an unconscious person
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • 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
Have product container or label with you when calling a poison control center or doctor or going for treatment	
HOT LINE NUMBER	
IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect 989-636-4400	
NOTE TO PHYSICIAN	
<p>The decision of whether to induce vomiting or not should be made by a physician. If lavage is performed, suggest endotracheal and/or esophageal control. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach. Respiratory symptoms, including pulmonary edema, may be delayed. Persons receiving significant exposure should be observed 24-48 hours for signs of respiratory distress. Maintain adequate ventilation and oxygenation of the patient. Chemical eye burns may require extended irrigation. Obtain prompt consultation, preferably from an ophthalmologist. If burn is present, treat as any thermal burn, after decontamination. specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.</p>	

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Apply this product only as specified on this label. Do not contaminate water by cleaning of equipment, or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, 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

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local 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 or disposal.

Pesticide Storage: To maintain product quality, store at temperatures below 35C. Keep container tightly closed when not in use.

Option for product supplied in water soluble packaging: To maintain product quality, store at temperatures below 35C. Keep container tightly closed when not in use. Do not remove from container except for immediate use. When ready to use REMOVE outer plastic packaging. DO NOT remove DBNPA 100 POWDER from water soluble bag.

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

Nonrefillable container. Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with the 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 DBNPA100 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

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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 100POWDER/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 asneeded 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 100POWDER/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 blow down.

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 blow down 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: DBNPA100 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.

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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.

WATER FLOOD

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.

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.

NET WT:

Option for product supplied in water soluble packaging: Net Contents:

Lot:

Produced For – *When produced by a contract manufacturer*

Dow Diamond
THE DOW CHEMICAL COMPANY
Midland, Michigan 48674
(989) 636-4400

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