

464-389

5/17/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

MAY 17 2012

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Rhonda Vance-Moeser  
Product Stewardship Regulatory Manager  
The Dow Chemical Company  
1803 Building  
Midland, MI 48674

Subject: **DBNPA 100 POWDER**  
EPA Registration No.: 464-389  
Application Date: April 26, 2012  
Receipt Date: April 30, 2012

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:**

Adding label language to include a metering device or chemical feeder for paper mills and cooling towers

**General Comment:**

Based on a review of the submitted material, the notification to add the metering device as referenced above, is acceptable and apart of the record on file.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.Jacqueline@epa.gov](mailto:campbell-mcfarlane.Jacqueline@epa.gov) or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at [grigsby.stacey@epa.gov](mailto:grigsby.stacey@epa.gov) during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline Campbell  
Product Manager (34)  
Regulatory Management Branch II

CONSUMER PRODUCTS Division (7510P)

SYMBOL							
SURNAME							
DATE							



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number  
 2710

**Application for Pesticide - Section I**

1. Company/Product Number 464-389	2. EPA Product Manager Jacquie Campbell-McFarlane	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) The Dow Chemical Company/ 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: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

Notification to add optional language to the label. Specifically, to use a metering device and or a feeder device. Required Notification statement on enclosed cover letter.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Metal Plastic Glass Paper 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 <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> 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 PSS Regulatory Manager	Telephone No. (Include Area Code) (989) 636-1334
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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.

6. Date Application Received  
(Stamped)

2. Signature Rhonda Vance-Moeser <small>Digitally signed by Rhonda Vance-Moeser DN: cn=Rhonda Vance-Moeser, o=Dow, email=rvmoeser@dow.com, c=US Date: 2012.04.27 13:56:45 -0400</small>	3. Title Product Stewardship Regulatory Manager
4. Typed Name Rhonda Vance-Moeser	5. Date April 26, 2012



3 7 10

The Dow Chemical Company  
Midland, MI 48674  
U.S.A.

April 26, 2012

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

Overnight Mail

**RE: NOTIFICATION – DBNPA 100 POWDER EPA REG. NO. 464 – 389**

Dear Ms. Campbell-McFarlane,

The Dow Chemical Company (Dow) hereby submits a label Notification to DBNPA 100 Powder, EPA Reg. No. 464-389. The Agency previously approved a Notification to include product addition via chemical feeder device for paper mills and cooling towers. The objective of this Notification is to clarify that we desire to have label options for product addition:

Proposed Notification label statement options:

- It must be made with a metering pump.....
- It must be made with a chemical feeder device .....
- It must be made with a metering pump or chemical feeder device....

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

**“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

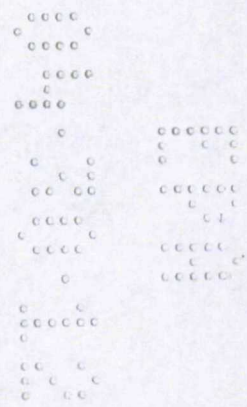
- 1) Completed application for Pesticide Registration, Form 8570-1.
- 2) Required notification statement above.
- 3) Three label copies (word format) with one highlighted indicating label change.

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

Sincerely,

*Rhonda Vance-Moeser*

Rhonda Vance-Moeser  
Product Stewardship Regulatory Manager  
1691 N. Swede Road, Larkin Lab, Midland, MI 48674  
Phone: (989) 636-1884 E-mail: [rgvmoeser@dow.com](mailto:rgvmoeser@dow.com)



Enclosurés

**MASTER LABEL**

**NOTIFICATION**  
Date Reviewed: 5/12/12  
Reviewed By: G. McLead

**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%  
Total .....100.0%

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 • Harmful if absorbed through the skin • 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.

### **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 Instructions**

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.

<b>FIRST AID:</b>	
<b>IF IN EYES</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 30 minutes</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call poison control center or doctor for treatment advice.</li></ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice</li><li>• Have person sip a glass of water if able to swallow</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor</li><li>• Do not give anything by mouth to an unconscious person</li></ul>
<b>IF INHALED</b>	<ul style="list-style-type: none"><li>• Move person to fresh air</li><li>• If person is not breathing, call an emergency responder or an ambulance, then give artificial respiration, preferably mouth-to-mouth.</li><li>• Call a poison control center or doctor for further treatment advice</li></ul>
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes</li><li>• Call a poison control center or doctor for treatment advice</li></ul>
Have product container or label with you when calling a poison control center or doctor or going for treatment	
<b>HOT LINE NUMBER</b>	
IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect 989-636-4400	
<b>NOTE TO PHYSICIAN</b>	
<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. No 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 and aquatic organisms. 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 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. Completely empty into application equipment. 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 DBNPA 100 POWDER SEPARATELY TO THE SYSTEM. DO NOT MIX 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 must be made with a metering pump\* or chemical feeder device\* 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

must 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

must 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

must 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.

\*Option for label - metering pump or chemical feeder device or both

#### 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 must be made with a metering pump or chemical feeder device; 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 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 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 must 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 must 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 must 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 must be added to injection water before polymer addition. Frequency and Dose: DBNPA 100 POWDER must be added at a rate of 6 to 54 ppm (0.05-0.45 lbs./1,000 gallons). Dry DBNPA 100 POWDER must 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 must be added at a rate of 6 to 54 ppm (0.05-0.45 lbs./1,000 gallons). Dry DBNPA 100 POWDER must 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*

DBNPA 100 Powder  
FINAL DRAFT LABEL – Changes Highlighted  
April, 2012

b3 10

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

<sup>TM</sup>Trademark of The Dow Chemical Company (“Dow”) or an affiliated company of Dow.

*Option –logo option for product supplied in chemical feeder device*

**Smart** *release*<sup>®</sup>  
**Technology**