

464-624

11/30/2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

November 30, 2006

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

Subject: Sump Buddy WT Antimicrobial Time Release Tablets  
EPA Registration No.: 464-624  
Application Date: November 7, 2006  
Receipt Date: November 11, 2006

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**

- Add the words "produced for" to the label.
- Revise trademark language on label.

**General Comments**

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

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

Sincerely,

Adam Heyward  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL	7510P						
JRNAME	Graham						
ATE	11/30/06						

Changes highlighted  
in yellow. 2/9

# Master Label

## SUMP BUDDY™ WT Antimicrobial Time Release Tablets

In Water-Soluble Bags (option for tablets with water soluble packaging)

For Use Only With Dow Direct Feeder (option for tablets designed for feeder device)

Controls bacteria, fungi, and algae in industrial cooling water systems and auxiliary water and waste water systems; controls slime-forming bacteria and fungi in industrial air-washer systems.

### FOR INDUSTRIAL USE ONLY

Active Ingredient(s):

2,2-Dibromo-3-nitrilopropionamide . . . . 40%

Inert Ingredient(s): . . . . . 60%

Total 100%

NOTIFICATION  
Date Reviewed: 11-30-04  
Reviewed By: A. G. [Signature]

E.P.A. Registration No. 464-624

E.P.A. Est.

KEEP OUT OF REACH OF CHILDREN

**DANGER**

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

CORROSIVE • CAUSES IRREVERSIBLE EYE DAMAGE • HARMFUL IF SWALLOWED OR ABSORBED THROUGH SKIN DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING • AVOID CONTACT WITH SKIN • WEAR CHEMICAL RESISTANT GLOVES • WEAR GOGGLES OR FACE SHIELD • PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS • WASH THOROUGHLY WITH SOAP AND WATER AFTER HANDLING • REMOVE CONTAMINATED CLOTHING AND WASH BEFORE REUSE



### **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 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.

### **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 35°C. Keep product in a closed container when not in use.

**Note (for tablets without water soluble packaging):** Do not remove tablet(s) from container except for immediate use.

**Note (for tablets with water soluble packaging):** Do not remove tablet(s) from container except for immediate use. When ready to use do not remove tablets from water soluble packaging.

**Note (for tablets designed for feeder device):** Do not remove tablets from packaging tube prior to use.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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.

**DIRECTIONS FOR USE**

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

**INDUSTRIAL COOLING WATER SYSTEMS**

**Note (for tablets without water soluble packaging):** Direct contact of SUMP BUDDY WT Antimicrobial Time-Release Tablets with a metal surface in the cooling system will cause local corrosion. To prevent corrosion, place a tablet of SUMP BUDDY WT Antimicrobial Time-Release Tablets in the holder provided or equivalent. Suspend/float it in the water so the tablet is completely submerged. Additional holders may be obtained from The Dow Chemical Company. SUMP BUDDY WT Antimicrobial Time-Release Tablets is best used in the basin of the cooling system in an area with little turbulence. Avoid placing SUMP BUDDY WT Antimicrobial Time-Release Tablets in direct sunlight.

**Note (for tablets with water-soluble packaging):** Tablets wrapped in water soluble packaging are ready for use and should not be removed from protective film. To prevent corrosion, place a tablet of SUMP BUDDY WT Antimicrobial Time-Release Tablets in Water Soluble Bags in the holder provided (or equivalent) and suspend/float it in the water so the tablet is completely submerged. Additional holders may be obtained from The Dow Chemical Company. SUMP BUDDY WT Antimicrobial Time-Release Tablets in Water Soluble Bags is best used in the basin of the cooling water system. Avoid areas of high velocity water flow. Avoid placing SUMP BUDDY WT Antimicrobial Time-Release Tablets in Water Soluble Bags in direct sunlight.

**Note (for tablets designed for feeder device):** Solid Biocare is intended for use only with the provided feeder from The Dow Chemical Company. To use, open the Solid Biocare packaging tube at one end. Squeeze tube at open end to hold tablets in tube. Invert tube and align open end over empty feeder. Release product from tube to load feeder.

To control bacteria, fungi, and algae in clean to moderately contaminated systems, add one tablet per 500-1,000 gallons of water in the system. Heavily contaminated systems may require two tablets per 500-1,000 gallons of water.

EACH TABLET OR GROUP OF TABLETS OF SUMP BUDDY WT Antimicrobial Time Release Tablets will PROVIDE APPROXIMATELY 3 WEEKS OF CONTROL. Add additional tablet(s) of SUMP BUDDY WT Antimicrobial Time-Release Tablets per 500-1,000 gallons of water in the system every 3 weeks, or as needed to maintain control.

## AUXILIARY WATER AND WASTE WATER SYSTEMS

**Note (for tablets without water soluble packaging):** Place tablets in holder provided or equivalent. The holders prevent direct contact with metal surfaces and keep tablets near the surface allowing easy observation. Additional holders may be obtained from The Dow Chemical Company.

**Note (for tablets with water-soluble packaging):** Tablets wrapped in water soluble packaging are ready for use and should not be removed from protective film. Place tablets in holder provided or equivalent. The holders prevent direct contact with metal surfaces and keep tablets near the surface allowing easy observation. Additional holders may be obtained from The Dow Chemical Company.

**Note (for tablets designed for feeder device):** Solid Biocare is intended for use only with the provided feeder from The Dow Chemical Company. To use, open the Solid Biocare packaging tube at one end. Squeeze tube at open end to hold tablets in tube. Invert tube and align open end over empty feeder. Release product from tube to load feeder.

SUMP BUDDY WT Antimicrobial Time-Release Tablets controls odor-forming and slime-forming bacteria, fungi, and algae in auxiliary water systems such as fire protection systems; pump or screen bays; waste water and waste material disposal; holding or recovery systems such as storage tanks, storage piles, associated piping, settling ponds or lagoons; transport spillways or canals; and disposal wells. SUMP BUDDY WT Antimicrobial Time-Release Tablets should be added to the system at a rate of one tablet per 500-1,000 gallons of water in the system. Each tablet will provide approximately 3 weeks of control per 500-1,000 gallons of water.

### **INDUSTRIAL AIR-WASHER SYSTEMS**

Use only in industrial air-washer systems that maintain effective mist eliminators.

**Note (for tablets without water soluble packaging):** Prevent direct contact between tablets and metal surfaces by using the holder provided or equivalent.

**Note (for tablets with water-soluble packaging):** Tablets wrapped in water soluble packaging are ready for use and should not be removed from protective film. Place tablets in holder provided or equivalent. These holders prevent direct contact with metal surfaces and keep tablets near the surface allowing easy observation. Additional holders may be obtained from The Dow Chemical Company.

**Note (for tablets designed for feeder device):** Solid Biocare is intended for use only with the provided feeder from The Dow Chemical Company. To use, open the Solid Biocare packaging tube at one end. Squeeze tube at open end to hold tablets in tube. Invert tube and align open end over empty feeder. Release product from tube to load feeder.

For control of slime-forming bacteria and fungi, add one to two tablets per 500 gallons of water in the system, depending on the severity of the contamination. Each tablet or group of tablets will provide approximately 3 weeks of control. Badly fouled systems must be cleaned before treatment is begun.

**Notice:** Seller warrants that the product conforms to its chemical description as contained on this label and is reasonably fit for the purposes stated on this label when used in accordance with directions under normal conditions of use. THE WARRANTIES MADE IN THIS PARAGRAPH ARE SELLER'S SOLE WARRANTIES WITH RESPECT TO THE PRODUCT AND ARE MADE EXPRESSLY IN LIEU OF AND EXCLUDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIONS AND WARRANTIES.

**NOTICE**

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

**Net Contents: 25 Tablets**  
**4 Tablets**

**NET WT: 5 kg / 11.023 l b**  
**NET WT: 0.8 kg/ 1.76 l b**

**LOT**

Produced For

Dow Diamond®  
The Dow Chemical Company  
Midland, MI 48674 U.S.A.  
(989) 636-4400

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

Made in U.S.A.



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Larkin Laboratory  
November 7, 2006

The Dow Chemical Company  
Midland, Michigan 48674  
USA

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  
Attn: Adam Heyward

**RE: NOTIFICATION – EPA REG. NO. 464 – 624  
SUMP BUDDY™ WT ANTIMICROBIAL TIME RELEASE TABLETS**

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

- 1) add the qualifier "Produced For" to the registrant name and address on the master product label when produced by a contract manufacturer
- 2) revise the trademark language on the product label

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 in word format of the master product label with one copy indicating changes highlighted in yellow
- 4) Two copies of final printed label for SUMP BUDDY WT Antimicrobial Time Release Tablets in Water Soluble Bags.

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

Sincerely,

Rhonda Vance-Moeser  
Senior Regulatory Specialist  
Phone: (989) 636-1884  
e-mail: [rgvmceser@dow.com](mailto:rgvmceser@dow.com)

Enclosures





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

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 464-624	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow Chemical / SUMP BUDDY WT	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**

<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 1) add "Produced For" above company name and address on master label and 2) Update trademark statement on label. Mandatory notification statement is contained in cover letter accompanying this notification submission.

**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 <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 5 kg/200 grams	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" 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 Senior Regulatory Specialist	Telephone No. (include Area Code) 989-636-1884
<b>Certification</b> 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 <i>Rhonda Vance-Moeser</i>	3. Title Senior Regulatory Specialist	
4. Typed Name Rhonda Vance-Moeser	5. Date 11/7/06	