

UNITED SPATES ENVIRONMENT AB PROTECT AS NO WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 8, 2003

Robert Rosenwasser Manager, Regulatory Affairs Ameribrom, Inc. 2115 Linwood Avenue Fort Lee, NJ 07024

Subject:

Biobrom® C-100G

EPA Registration No. 8622-56 Your Letter Dated July 15, 2003

Dear Mr. Rosenwasser:

The following amendment, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment:

Add "Oilfield and Petrochemical Systems to existing Enhanced Oil Recovery System

General Comment:

A stamped copy of the accepted labeling is enclosed.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,

Adám Heyward

Product Manager (34)

Regulatory Management Branch II

Antimicrobials Division (7510C)

Enclosure

CONCURRENCES								
SYMBOL								
SURNAME)							* **********	
DATE								

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANNIHAZARDS

DANGER

CORROSIVE
CAUSES SEVERE BURNS OF EYES
EYE CONTACT MAY CAUSE LOSS OF VISION
MAY BURN THE SKIN
MAY BE FATAL IF SWALLOWED

Do not get in eyes, on skin, or on clothing. Impact-resistant goggles with sideshields, or face shield, and rubber gloves must be worn when handling. Do not breathe mist or vapor. Use with adequate ventilation.

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	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 dector for treatment advice.
If inhaled	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial suspiration, preferably by mouth-to-mouth, it cossible. Call a poison control center or distor for further treatment advice.
if on skin or clothing	Take off contaminated clothling Rinse skin immediately with pure of water for 15-20 minutes. Call a poison control center or set or for treatment advice.
if swallowed	Call poison control center, or the primmediately for treatment add. Have person sip a glass of wall fable to swallow. Do not induce vomiting unless and to do so by the poison control center of doctor. Do not give anything by mouth than unconscious person.

Have the product container or label with you when ming a poison control center or doctor, or going for tree.

NOTE TO PHYSICIAN

"Note to Physician: Probable mucosal damages ay contraindicate the use of gastric lavages."

BIOBROM® C-100G

A MICROBIOCIDAL BACTERICIDE, FUNGICIDE, ALGICIDE
AND SLIMICIDE, USED IN TREATING RECIRCULATING COOLING
WATER IN INDUSTRIAL COOLING SYSTEMS, PAPER MILLS,
BREWERY PASTEURIZER WATER, METALWORKING CUTTING
FLUIDS, NON-POTABLE REVERSE OSMOSIS SYSTEMS, ENHANCED
OIL RECOVERY SYSTEMS, AIR-WASHER SYSTEMS, INDUSTRIAL
PRESERVATION APPLICATIONS AND PUBLICLY-OWNED

ACTIVE INGREDIENT:	2,2-Dibromo-3-nitrilopropionamide		
INERT INGREDIENTS:	***************************************	2%	
	TOTAL:	100%	

TREATMENT WORKS.

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panels for additional precautionary statements

EPA Reg. No. 8622-56

EPA Est. No. 56567-IL-001 EPA Est. No. 15298-IS-1

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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 neither this warranty nor any other warranty of MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, express 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.

MANUFACTURED IN ISRAFL FOR: AMERIBROM, INC.
2115 LINWOOD AVENUE
FORT LEE. NJ 07024

(201) 242-6560

WASH THOROUGHLY AFTER HANDLING OC

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Under the Federal Insecticide, Fungicide, and Rodenticide, Act as amended, for the pesticide, registered under EPA Reg. No. 86222-516

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not contaminate water by cleaning of equipment or disposal of weste. Do not discharge effluent containing this product into takes, 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.

CHEMICAL AND PHYSICAL HAZARDS

Reaction with strong reducing agents may be explosive. Avoid comminution and dusting.

STORAGE AND DISPOSAL

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

Store in a dark, cool, dry, well-ventilated area, in well-closed original containers, away from energy sources, combustible organic materials, oxidizers, and moisture. 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 Hezardous Waste representative at the nearest EPA Regional Office for quidance.

CONTAINER DISPOSAL

Completely empty liner by shaking and tapping sides and bottom to loosen dinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incireration if allowed by State and local authorities. If drum is contaminated and cannot be re-used, dispose of in the same manner, if drum is not contaminated and can be re-used, offer for recycling or reconditioning.

SPILLS

When handling or dealing with spills, use impact-resistant goggles with side shields, or face shield; wear body-covering clothes, including impervious rubber gloves and boots; use a dust respirator if dusting occurs. Sweep up dry spills and dispose of as described for pesticide dispose. Cover wet spills with 10% sodium bicarbonate solution, water and then an inert absorbent before sweeping up and disposing as described for pesticide disposal. If drum contents are contaminated or decomposing, isolate unsealed drum in the open or in a well-ventilated area; flood with 10% sodium bicarbonate solution and large volumes of water if necessary.

DO NOT SHIP WITH FOOD, FEEDS, DRUGS, OR CLOTHING

KEEP CONTAINER TIGHTLY CLOSED WHEN NOT IN USE

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its tabeling

TREATING RECIRCULATING COOLING WATER IN INDUSTRIAL OR COMMERCIAL COOLING SYSTEMS

NOTE: Add BIOBROM C-100G separately to the system. Do not mix it with other additives, so as to avoid decomposition of BIOBROM C-100G due to the high pH of many additive formulations.

Add BROBROM C-100G to the basin (or any other point of uniform mixing). Addition should be made via a metering pump: it may be continuous or intermittent, depending on the severity of the contamination when treatment is begun, and the in-system retention time. Optimum performance with this product is achieved by continuous or intermittent treatment. If "shock" treatment is used, the blowdown should be discontinued for 24-48 hours.

FOR CONTROL OF BACTERIA

Add sufficient BIOBROM C-100G to reach a concentration in the system of 0.2 – 2.3 ppm active ingredient, depending on the severity of contamination. EVITERMITTENT OR SLUG METHOD

faltial Dose: When the system is noticeably fouled, add sufficient BIOBROM C-100G to reach a concentration in the system of 1.2 – 2.3 ppm active ingredient. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 0.6 – 2.3 ppm BIOBROM C-100G to the system every 4 days, or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

CONTINUOUS FEED METHOD

Initial Dose: When the system is noticeably fouled, add sufficient BIOBROM C-100G to achieve a concentration in the system of 1.2 – 2.3 ppm.

Subsequent Dose: Maintain a concentration of 0.2 – 1.2 ppm BloBROM C-100G in the system. Badly fouled systems must be cleaned before treatment is begun.

Add sufficient BIOSROM ingredient, depending on MTERMITTENT OR SLU Intitle Dose: When the space oncentration in the state achieved.

Subsequent Dose: What maintain a concentration in maintain control. Budly is CONTINUOUS FEED tell initial Dose: When the sy concentration in the syste Subsequent Dose: Siein system. Budly fouled system.

TREATING PULL AND P NOTE: Add BIOSINGIA Cto avoid decompation of For the control of alline-to mile, add BIOSINGIA C-11 Addition can be continuous contamination. Addition is distribution of BIOSINGIA or discharge, broke dijest systems must be finition of paper or pulp as incose continuously with 0.02 - o accurrulation is controlled C-100G Ann (dry) of paper sime may cause breaks is Stightly fouled systems 100G Ann (dry) of paper 100G Ann (dry) of paper

TREATING NON-POTABLE For controlling beclaria, fu peripheral equipment; additionation area aftered a metering pump on an inguidatines specified by the BUOSROM C-1003 to ach During use of BIOSROM Conce treatment is complete the permeate area at easystems must be cleaned

Initial Dose: When the sy concentration of 1,2 + 2.4 should be 15 minutes. Re recommended by the mer Subsequent Dose: When ppm of BIOBROM C-10X membrane manufacturer.

Initial Dose: When the sy the feedwater. Minimum is or as specified by guidelin Subsequent Dose: Whe ppm of BIOSROM C-100 membrane manufacturer.

TREATING INSTALLINGS
BIOBROM C-100G is efficient at ratios of 1:100 to yeasts that may deteriors the collection tank. Addit he field of Stug Dose: White metalworking fields. Subsequent Dose: Whe ppm BIOBROM C-100G C-100G product gar be in

TREATING BREWERY PASTEURIZER WATER

For controlling (or inhibiting) the growth of bacteria, fungi or yestle in newery pasteurizing water systems, add BIOGROM C-100G at a point in the system to insure uniform mixing.

Initial or Stug Dose: When the system is noticeably fouled, add each ent BIOBROM C-100G to achieve a concentration of 60.6 ppm active in adjent in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, maintain a consentration of 24.4 – 48.4 ppm BIOBROM C-100G in the system, or as needed maintain control. Additions of BIOBROM C-100G product can be made careful justy or intermittently. Stug the system as required. Badly fouled systems to be cleaned before treatment to begun.

TREATING ENHANCED OIL RECOVERY SYSTEMS

NOTE: Add BIOBROM C-100G separately to the system. Do not make with other additives, so as to avoid decomposition of BIOBROM C-100G he to the high pH of many additive formulations, Addition of BIOBROM C-100G may be made at the tree water inockouts, before or after the injection pusses and injection well headers.

infection well headers.
For controlling stime-forming bacteria, suffice-producing bacteria, yet is and fund in oil field water, polymer or micetiar floods, water-disposal series, or other oil field water systems, add sufficient BIOBROM C-100G to allow a concentration in feedwater of 0.2 – 16.0 ppm depending on the series of contamination. Additions should be made with a metering pump each continuously or intermittently.

CONTINUOUS FEED METHOD

When the system is noticeably fouled, add 2 - 16 ppm BIOBROM GOG continuously until the desired degree of control is achieved. Subsecting the with 0.2 - 3.9 ppm BIOBROM C-100G continuously or as needed to sintain control.

INTERMITTENT OR SLUG METHOD

When the system is noticeably fouled or to maintain control of their puri, add 2.0 - 16.0 ppm 8IOBROM C-100G intermittently for 4-8 hours per and find from 1-4 times per week, or as needed depending on the severity of cell NOTE: For control of bacteria, yeast, and fungi in aqueous solution biopolymer used in flooding operations, add 3 - 16 ppm BIOBROM 6-100G about the made with a metering immediately after preparation of the aqueous biopolymer solution is of sicosity.

DIRECTIONS FOR TREATING AIR-WASHER SYSTEMS

Add sufficient BIOBROM C-100G to reach a concentration in the print of 0.35 -22.1 ppm active ingredient, depending on the severity of content on to control strine-forming bacteria and fungl in industrial air washing as N

Initial Dose: When the system is noticeably fouled, add sufficient. ROM C-100G to reach a concentration in the system of 0.7 – 22.1 ppm and gradient. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add suffice. DBROM C-100G every 2 days to reach a concentration in the system of 8.3 fo.9 ppm active ingredient, or as needed to maintain control. Badly fouled a must be cleaned before treatment is begun.

CONTINUOUS FEED METHOD.

Initial Dose: When the system is noticeably fouled, add sufficient 1 BROM C-100G to achieve a concentration in the system of 0.7 – 22.1 ppm incredient.

Subsequent Dose: Maintain this level by pumping a continuous of 0.35 - 10.9 ppm active ingredient in the system per day. Badly fouled a must be cleaned before treatment is begun.

NOTE: For use only in industrial air-washer systems that maintain active mis eliminating components.

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Under the Federal Insecticide, as Rodenticide, Act as amenda the pesticide, registered under EPA Reg. No. 8622

DIRECTIONS FOR INDUSTRIAL PRESERVATION APPLICATIONS

SIOBROM C-100G may be used to reduce microbiological contamination in raw materials and/or products such as: aqueous paints and coatings, polymers, sluries, adhesives, latex and resin emulsions, sizing, caulk, process water, along with apacialty industrial products including: inks, polishes, waxes, detergents, and clean-pass.

TO REDUCE MICROBIOLOGICAL CONTAMINATION

Add BIOBROM C-100G to the raw material or product at a concentration of 5 to 408 ppm by weight. This concentration is equivalent to 0.036 to 2.894 lbs. BIOBROM C-100G per 1,000 gallons. The required concentration will depend on the material being treated and the level of contamination present.

DIRECTIONS FOR TREATING PUBLICLY-OWNED TREATMENT WORKS TO CONTROL COLIFORM AND OTHER BACTERIA

Add sufficient BIOGROM C-100G to reach a concentration in the system of 0.2 to 2.0 ppm active ingredient by weight of water being treated, depending on the severity and contentiation in the system. Addition should be CONTINUOUS and should be made with a matering pump at a point in the system where mixing will be rigid and thorough. Add BIOGROM C-100G to the system in a location where contact time will be 30 minutes or greater before reaching the outfall. TO USE AS A CO-TREATMENT WITH CHLORINE.

Add sufficient BIOBROM C-100G to reach a concentration in the system of 0.1 to 0.3 ppm BIOBROM C-100G active ingredient by weight of water treated. Chloritation should result in a minimum detectable residual (i.e., greater than zero but less than the NPOES permit level). Addition should be CONTINUOUS and made at a point just effer initial chlorine mixing. Rapid mixing is necessary for miximum effectiveness. BIOBROM C-100G should be added at a location where a contact time of 10 minutes or longer will be provided before reaching the cutfall.

DIRECTIONS FOR TREATING OIL-FIELD AND PETROCHEMICAL SYSTEMS BIOBROM C-100G may be used either in slug treatment or in continuous application. Desages may very from as much as 40 ppm of BIOBROM C-100G in slug application to 2 to 10 ppm of BIOBROM C-100G in continuous treatment (0.061 lbs. BIOBROM C-100G per 1,000 gallons of water equals approximately 7 ppm).

A typical stug treatment is to add 0.25 lbs. of BIOBROM C-100G per 1,000 gallons at intervals as needed to prevent growth of microbial silms. Badly fouled systems may be stug treated to establish control, followed by continuous treatment to maintain control.

DIRECTIONS FOR TREATING FRACTURING FLUIDS

BIOBROM C-100G reduces bacterial contamination and degradation of fracturing gels and fluids used as well stimulants in the oil and gas industry. Biobrom C-100G may be added during pre-mixing of the tracturing fluid or (in the case of direct mix/injection systems) an aqueous solution may be added by direct injection at the head during the fracturing procedure. FREGUENCY AND DOSE:

Blobrom C-100G should be used for each fracturing operation to ensure best results. Blobrom C-100G should be added at a rate of 2.0 to 3.0 ibs. per 10,000 gallons (approximately 24 to 36 ppm) depending on the quality of the makeup water.

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