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04-28-2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

APR 2 8 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mr. George Katsigras Regulatory Affairs Specialist ICL-IP America Inc. 95 MacCorkle Ave. S.W. South Charleston, WV 25311

Subject: Biobrom® C-100G EPA Registration Number: 8622-56 Application Date: February 01, 2011 Receipt Date: February 03, 2011

Dear Mr. Katsigras:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended, and PR Notice 2007-4 is acceptable.

Proposed Amendment:

Registrant is adding direction for chemical dispenser canister and updating container disposal statement.

General Comments:

A stamped accepted label is enclosed for your records. Submit a final printed label before distributing or selling the product bearing the revised labeling.

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at <u>Campbell-mcfarlane.jacqueline@epa.gov</u> or Glen McLeod by telephone at (703) 347-0181 or by email at <u>mcleod.glen@epa.gov</u>. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

Jacqueline Campbell-MoFarlane Product Manager Team 34 Regulatory Management Branch II Antimicrobials Division (7510P)

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{All text in brackets [xxx] is optional and may or may not be intended on a final label.} {All text in braces {xxx} is administrative and will not appear on a final label.}

{MASTER LABEL}

BIOBROM[®] C-100G DBNPA

A MICROBIOCIDAL BACTERICIDE, FUNGICIDE, ALGAECIDE 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 TREATMENT WORKS.

ACTIVE INGREDIENT:	2,2-Dibromo-3-nitrilopropionamide	98%
INERT INGREDIENTS:		2%
TOTAL:		100%

KEEP OUT OF REACH OF CHILDREN DANGER

	FIRST AID	1
lf 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 doctor for treatment advice. 	
If inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice. 	
If on skin or clothing	 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. 	
If swallowed	 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person 	
	duct container or label with you when calling a poison control center or doctor, or going for treatment. ALSO CONTACT 1-[xxx-xxx-xxxx] FOR EMERGENCY MEDICAL TREATMENT INFORMATION.	
	NOTE TO PHYSICIAN Probable mucosal damage may contraindicate the use of gastric lavage.	Ì

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See [back] [side] panels for [additional precautionary statements] [and] [first aid].

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CORROSIVE: Causes irreversible eye damage. Do not get in eyes, skin or clothing. Wear impact-resistant goggles with side-shields, or face shield. May be fatal if inhaled. Do not breathe dust, vapor or spray mist. Wear a respirator with either an organic-vapor-removing cartridge with a pre-filter approved for pesticides (MSHA/NIOSH approval number Prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). May be fatal if swallowed. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

Personal Protective Equipment: (PPE)

Long sleeve shirt, long pants, shoes plus socks, eye protection, respirator, chemical-resistant gloves and a chemical resistant apron must be worn when handling

USER SAFETY REQUIREMENTS: Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing immediately if pesticide get inside. Wash the outside of gloves before removing. Keep and wash PPE separately from other laundry. Then wash thoroughly and put on clean clothing. Users must remove

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PPE immediately after handling this product. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washable exist, use detergent and hot water. Keep and Wash PPE separately from other laundry.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and invertebrates. Do not contaminate water by cleaning of equipment or disposal of waste. 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.

CHEMICAL AND PHYSICAL HAZARDS

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

DIRECTIONS FOR USE

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

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 BIOBROM C-100G to the basin (or any other point of uniform mixing). Addition must be made via a metering pump or chemical feed dispenser with control release mechanism that accompanies this product's container: 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 must 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.

INTERMITTENT OR SLUG METHOD

Initial 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 BIOBROM C-100G in the system. Badly fouled systems must be cleaned before treatment is begun.

FOR CONTROL OF FUNGI AND ALGAE

Add sufficient BIOBROM C-100G to reach a concentration in the system of 7.0 – 23.0 ppm active ingredient, depending on the severity of contamination.

INTERMITTENT OR SLUG METHOD

Initial Dose: When the system is noticeably fouled, add sufficient BIOBROM C-100G to achieve a concentration in the system of 11.6 – 23.0 ppm active ingredient. Maintain until control is achieved.

Subsequent Dose: When microbial control is evident, add sufficient BIOBROM C-100G daily to maintain a concentration in the system of 7.0 - 23.0 ppm active ingredient, 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 reach a concentration in the system of 11.6 – 23.0 ppm active ingredient.

Subsequent Dose: Maintain a continuous feed of 7.0 – 23.0 ppm BIOBROM C-100G in the system. Badly fouled systems must be cleaned before treatment is begun.

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TREATING PULP AND PAPER MILL 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. For the control of slime-forming bacterial, fungal. and yeast growth in pulp, paper, and paperboard mills, add BIOBROM C-100G at levels of 0.03 - 0.10 lb./ton (dry) of pulp or paper produced. Addition can be continuous or intermittent, depending upon the type of system and the severity of contamination. Addition is via a metering pump at a point in the system that will ensure uniform distribution of BIOBROM C-100G in the mass of fiber and water, such as the beaters, Jordan inlet or discharge, broke chests, furnish chests, savealls and white-water tanks. Heavily fouled systems must be first boiled out, then treated with 0.03 - 0.07 lb. of BIOBROM C-100G /ton (dry) of paper or pulp as necessary for control. Moderately fouled systems must be treated continuously with 0.07 - 0.10 lb. of BIOBROM C-100G /ton (dry) of paper or pulp until the slime accumulation is controlled. Subsequent rates can then be reduced to 0.03 - 0.07 lb. of BIOBROM C-100G /ton (dry) 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. of BIOBROM C-100G /ton (dry) of paper or pulp, until the slime is controlled, then added on an intermittent basis to maintain control.

TREATING NON-POTABLE REVERSE OSMOSIS SYSTEMS

For controlling bacteria, fungi and algae slimes in non-potable Reverse Osmosis Systems and peripheral equipment, add BIOBROM C-100G to the system inlet water or before any other contamination area ahead of the Reverse Osmosis unit BIOBROM C-100G must be added with a metering pump on an intermittent basis depending on the severity of contamination and the guidelines specified by the membrane manufacturer for BIOBROM C-100G. Add sufficient BIOBROM C-100G to achieve a concentration of 0.2 - 24.0 ppm in the feedwater.

During use of BIOBROM C-100G both permeate and reject waters must be directed to the drain. Once treatment is completed, rinsing with feedwater must continue until conductivity values in the permeate are at or below values before treatment with BIOBROM C-100G. Badly fouled systems must be cleaned before treatment is begun. FOR CONTROL OF BACTERIA

Initial Dose: When the system is noticeably fouled, add sufficient BIOBROM C-100G to achieve a concentration of 1.2 -2.4 ppm active ingredient in the feedwater. Minimum treatment intervals must be 15 minutes. Repeat until control is achieved or as specified by guidelines recommended by the membrane manufacturer.

Subsequent Dose: When microbial control is achieved, maintain a concentration of 0.6 - 2.4 ppm of BIOBROM C-100G in the feedwater, or as specified by by membrane manufacturers' guidelines.

FOR CONTROL OF FUNGI AND ALGAE

Initial Dose: When the system is noticeably fouled, add 12.0 - 24.0 ppm BIOBROM C-100G to the feedwater. Minimum treatment intervals must be 15 minutes. Repeat until control is achieved or as specified by guidelines recommended by the membrane manufacturer.

Subsequent Dose: When microbial control is achieved, maintain a concentration of 7.2 – 24.0 ppm of BIOBROM C-100G in the feedwater, or as specified by membrane manufacturers' guidelines.

TREATING METALWORKING FLUIDS CONTAINING WATER

BIOBROM C-100G is effective in metalworking fluid concentrates which have been diluted in water at ratios of 1:100 to 1:14. For controlling (or inhibiting) the growth of bacteria, fungi and yeasts that may deteriorate metalworking fluids containing water, add this product to the fluid in the collection tank. Additions must be made with a metering pump. Initial or Slug Dose: When the system is noticeably fouled, add 60.6 ppm BIOBROM C-100G to the metalworking fluids. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, maintain a concentration of 24.4 - 48.4 ppm BIOBROM C-100G in the system, or as needed to maintain control. Additions of BIOBROM C-100G product can be made continuously or intermittently. Slug the system as required.

TREATING BREWERY PASTEURIZER WATER

For controlling (or inhibiting) the growth of bacteria, fungi or yeasts in brewery pasteurizing water systems, add BIOBROM C-100G at a point in the system to insure uniform mixing via metering pump or chemical feed dispenser with control release mechanism that accompanies this product's container.

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

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

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TREATING ENHANCED OIL RECOVERY 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. Addition of BIOBROM C-100G may be made at the free water knockouts, before or after the injection pumps and injection well headers.

For controlling slime-forming bacteria, sulfide-producing bacteria, yeasts and fungi in oil field water, polymer or micellar floods, water-disposal systems, or other oil field water systems, add sufficient BIOBROM C-100G to achieve a concentration in feedwater of 0.2 – 16.0 ppm depending on the severity of contamination. Additions must be made with a metering pump either continuously or intermittently.

CONTINUOUS FEED METHOD

When the system is noticeably fouled, add 2 - 16 ppm BIOBROM C-100G continuously until the desired degree of control is achieved. Subsequently, treat with 0.2 – 3.9 ppm BIOBROM C-100G continuously or as needed to maintain control. **INTERMITTENT OR SLUG METHOD**

When the system is noticeably fouled or to maintain control of the system, add 2.0 - 16.0 ppm BIOBROM C-100G intermittently for 4-8 hours per day and from 1-4 times per week, or as needed depending on the severity of contamination.

NOTE: For control of bacteria, yeast, and fungi in aqueous solutions of biopolymer used in flooding operations, add 3 - 16 ppm BIOBROM C-100G. Additions of BIOBROM C-100G must be made with a metering pump immediately after preparation of the aqueous biopolymer solution to reduce loss of viscosity.

DIRECTIONS FOR TREATING AIR-WASHER SYSTEMS

Add sufficient BIOBROM C-100G via metering pump or chemical feed dispenser with control release mechanism that accompanies this product's container to reach a concentration in the system of 0.35 – 22.1 ppm active ingredient, depending on the severity of contamination to control slime-forming bacteria and fungi in industrial air washing systems.

INTERMITTENT OR SLUG METHOD

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

Subsequent Dose: When microbial control is evident, add sufficient BIOBROM C-100G every 2 days to reach a concentration in the system of 0.35 – 10.9 ppm active ingredient, 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 0.7 – 22.1 ppm active ingredient.

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

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

DIRECTIONS FOR INDUSTRIAL PRESERVATION APPLICATIONS

BIOBROM C-100G may be used to reduce microbiological contamination in raw materials and/or products such as: aqueous paints and coatings, polymers, slurries, adhesives, latex and resin emulsions, sizing, caulk, process water, along with specialty industrial products including: inks, polishes, waxes, detergents, and cleansers. 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 BIOBROM 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 contamination in the system. Addition must be CONTINUOUS and must be made with a metering pump at a point in the system where mixing will be rapid and thorough. Add BIOBROM 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. Chlorination must result in a minimum detectable residual (i.e., greater than zero but less than the NPDES permit level). Addition must be CONTINUOUS and made at a point just after initial chlorine mixing.

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Rapid mixing is necessary for maximum effectiveness. BIOBROM C-100G must be added at a location where a contact time of 10 minutes or longer will be provided before reaching the outfall.

DIRECTIONS FOR TREATING OILFIELD AND PETROCHEMICAL SYSTEMS

BIOBROM C-100G may be used either in slug treatment or in continuous application. Dosages may vary 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 slug treatment is to add 0.25 lbs. of BIOBROM C-100G per 1,000 gallons at intervals as needed to prevent growth of microbial slime. Badly fouled systems may be slug 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 fracturing 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. **FREQUENCY AND DOSE:**

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

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

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 Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER HANDLING**:

{for PLASTIC BAG}

[Non-refillable container. Do not reuse or refill this container. Completely empty bag into application equipment by shaking and tapping sides and bottom to losen clinging particles. If not emptied in this manner, the bag may be considered an acute hazardous waste and must be disposed in accordance with local, state and federal regulations. When completely empty, offer for recycling if available, or dispose of bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke].

{for SUPERSACK}

Non-refillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Offer for recycling if available or dispose in a sanitary landfill or by procedures approved by state and local authorities. {for FIBER DRUM}

[Non-refillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Offer for recycling if available or dispose in a sanitary landfill or by procedures approved by state and local authorities. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto it other end and tip it back and forth several times. Empty rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.]

[Non-refillable container. Do not reuse or refill this container. Offer for recycling if available or dispose in a sanitary landfill or by procedures approved by state and local authorities. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment of mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.] {for BOTTLE or JAR or CANISTER}

Non-refillable container. Do not reuse or refill this container. Completely empty [bottle][jar][canister] into application equipment. If not emptied in this manner, the [bottle][jar][canister] may be considered an acute hazardous waste and must be disposed in accordance with local, state and federal regulations. When completely empty, offer for recycling if available, or dispose of [bottle][jar][canister] in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.]

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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 disposal. 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 bicarbonate solution.

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 FOR: ICL-IP America Inc. 95 MacCorkle Avenue S.W. South Charleston, WV 25303 Tel: (304) 720-3590

EPA Reg. No. 8622-56 EPA Est. No. _____

NET CONTENTS: ____[lbs.] [kgs.]