



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 3, 2012

Hanna Silberberg
Regulatory Affairs Manager
ICL-IP America Inc.
95 MacCorkle Avenue, S.W.
South Charleston, WV 25311

Subject: BIOBROM® C-105L
EPA Registration Number: 8622-63
Application Date: November 21, 2011
EPA Receipt Date: November 22, 2011

Dear Ms. Silberberg:

The following amendment, submitted in connection with registration under section of the federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided the following label changes are made:

Proposed label amendment:

Revise master labeling directions for use (DFU) to include the following:

- Correct ppm calculations;
- Correct decimal typo/Air-washer use directions;
- Reformat text/Precautionary statements;
- Minor formatting changes.

Labeling comment(s)

1. In the directions for use sections for the various site/pest, change the recommended word "**should**" to the mandatory word "**MUST**" wherever it appears in the sections.
2. In accordance with the RED for DBNPA and the acute toxicity review dated December 17, 1998, the following statement must be included in the precautionary statement paragraph:

"This product may cause skin sensitization reactions in some people."

-2-

3. On page #5 of 5, first sentence: the statement should read, "Add 1.6-6.0 ppm of this product, etc..."
4. In accordance with the label manual, the ingredient statement should be displayed as follow:

ACTIVE INGREDIENT:

2,2-Dibromo-3-nitrilopropionamide	5.49%
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<u>OTHER INGREDIENTS</u>	<u>94.51%</u>
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Total	100.00%
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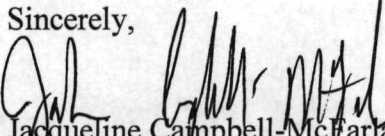
5. In the *User Safety Recommendations* section of the label, change the word "should" to "must" wherever it appears in the paragraph.

General Comments:

Submit three copies of the final printed label bearing the above revisions. A copy of the label will be stamp accepted and return for your record.

Should you have any questions or comments concerning this letter, please contact Adam Heyward via email at heyward.adam@epa.gov or by telephone at (703) 347-0274 during the hours of 6:00 am to 2:30 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,



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

BIOBROM[®] C-105L

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-nitropropionamide..... 5.49%
 INERT INGREDIENTS: 94.51%
 TOTAL: 100.00%

2.5 pounds BIOBROM[®] C-105L liquid per gallon.

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

If in eyes	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<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.
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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. YOU MAY ALSO CONTACT [1-800-420-9236][1-304-746-3000][telephone number supplied by the supplemental registrant] FOR EMERGENCY MEDICAL TREATMENT INFORMATION.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage

See [back] [side] panels for additional precautionary statements [and First Aid].

ACCEPTED
 WITH COMMENTS
 EPA Label 10/1/11

JAN - 3 2012

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 amended for the 21st Century,
 registered under EPA Reg. No.

8622-63

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****DANGER**

Corrosive. Causes irreversible eye damage. Eye contact may cause loss of vision. Harmful if swallowed, inhaled or absorbed through the skin. Wash thoroughly after handling. Do not smoke, drink, or eat when handling. Keep container tightly closed when not in use. Do not ship with food, feeds, drugs, or clothing. To maintain product quality, store in the dark at temperatures below 104°F (40°C).

Avoid breathing vapors or spray mist. Do not get in eyes or on clothing. Avoid contact with skin. In case of contact immediately rinse skin with plenty of water. Get medical attention if irritation persists. Wear protective eyewear (goggles, face shield or safety glasses). Use with adequate ventilation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before re-use.

PERSONAL PROTECTION EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Coveralls worn over long sleeved shirt and long pants
- Chemical resistant footwear plus socks
- Goggles or face shield
- Chemical-resistant gloves (such as barrier laminate, butyl rubber, neoprene rubber, nitrile rubber, polyvinyl chloride (PVC and viton)

FOR CLEANING EQUIPMENT:

- Chemical-resistant apron

Follow manufacturer's 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 ~~should~~ wash hands before drinking, chewing gum, using tobacco, or using the toilet.

Users ~~should~~ remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users ~~should~~ remove personal protective equipment immediately after handling this product. Wash outside of gloves before removing. As soon as possible wash thoroughly.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. 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 OR PHYSICAL HAZARDS

Reaction with strong reducing agents may be explosive. Avoid misting.

DIRECTIONS FOR USE

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

Read entire label and use strictly in accordance with precautionary statements and directions.

DIRECTIONS FOR TREATING INDUSTRIAL RECIRCULATING COOLING WATER IN INDUSTRIAL COOLING SYSTEMS

NOTE: Add this product separately to the system. Do not mix it with other additives, so as to avoid decomposition of this product due to the high pH of many additive formulations. Add this product 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 0.00380-0.0380 gallons of this product/ 1000 gal. of water in the system depending on the severity of contamination.

INTERMITTENT OR SLUG METHOD

Initial Dose: When the system is noticeably fouled, add 0.0192-0.0380 gal. of this product / 1000 gal. of water in the system.

Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 0.0096-0.0380 gal. of this product/ 1000 gal. of water in 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 0.0192-0.0380 gal. of this product/ 1000 gal. of water in the system.

Subsequent Dose: Maintain this level by pumping a continuous feed of 0.00380-0.0192 gal. of this product/ 1000 gal. of water in the system lost by blowdown. Badly fouled systems must be cleaned before treatment is begun.

FOR CONTROL OF FUNGI AND ALGAE

Add 0.116-0.380 gallons of this product/ 1000 gal. of water in the system, depending on the severity of contamination.

INTERMITTENT OR SLUG METHOD

Initial Dose: When the system is noticeably fouled, add 0.192-0.380 gal. of this product/ 1000 gal. of water in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 0.116-0.380 gal. of this product/ 1000 gal. of water in the system daily, 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 0.192-0.380 gal. of this product/ 1000 gal. of water in the system.

Subsequent Dose: Maintain this treatment level by pumping a continuous feed of 0.116-0.380 gal. of this product/ 1000 gal. of water in the system per day. Badly fouled systems must be cleaned before treatment is begun.

DIRECTIONS FOR TREATING PULP AND PAPER MILL SYSTEMS

NOTE: Add this product separately to the system. Do not mix it with other additives, so as to avoid decomposition of this product 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 this product at levels of 0.60-2.00 lbs./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 this product 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 first be boiled out, then treated with 0.60-1.40 lbs. of this product/ton (dry) of paper or pulp as necessary for control. Moderately fouled systems should be treated continuously with 1.40-2.00 lbs. of this product/ton (dry) of paper or pulp until the slime accumulation is controlled. Subsequent rates can then be reduced to 0.60-1.40 lbs. of this product/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 should be treated continuously with 0.60-1.40 lbs. of this product/ton (dry) of paper or pulp, until the slime is controlled, then added on an intermittent basis to maintain control.

DIRECTIONS FOR TREATING NON-POTABLE REVERSE OSMOSIS SYSTEMS

For controlling bacteria, fungi and algae slimes in non-potable Reverse Osmosis systems and peripheral equipment, add this product to the system inlet water or before any other contamination area ahead of the Reverse Osmosis unit. This product ~~should~~ 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 this product.

Add this product at the rate of 0.04 to 4.0 lbs (5 to 480 ppm) per 1000 gals of feedwater. During use of this product both permeate and reject waters ~~should~~ be directed to the drain. Once treatment is completed, rinsing with feedwater ~~should~~ continue until conductivity values in the permeate are at or below values before treatment with this product. Badly fouled systems must be cleaned before treatment is begun.

FOR CONTROL OF BACTERIA

Initial Dose: When the system is noticeably fouled, add this product at the rate of 0.2 to 0.4 lb (24 to 48 ppm) per 1000 gals of feedwater. Minimum treatment intervals should 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, add this product at the rate of 0.1 to 0.4 lb (12 to 48 ppm) per 1000 gals of feedwater as needed to maintain control or as specified by guidelines recommended by the membrane manufacturer.

FOR CONTROL OF FUNGI AND ALGAE

Initial Dose: When the system is noticeably fouled, add this product at the rate of 2.0 to 4.0 lbs. (240 to 480 ppm) per 1000 gals of feedwater. Minimum treatment intervals should 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, add this product at the rate of 1.2 to 4.0 lbs. (144 to 480 ppm) per 1000 gals of feedwater as needed to maintain control or as specified by guidelines recommended by the membrane manufacturer.

DIRECTIONS FOR TREATING METALWORKING FLUIDS CONTAINING WATER

This product is effective in metalworking fluid concentrates which have been diluted in water at ratios of 1:25 to 1:1. 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 ~~should~~ be made with a metering pump.

Initial or Slug Dose: When the system is noticeably fouled, add this product at the rate of 1.1 gals (2.65 lbs) per 1000 gals of metalworking fluid in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add this product at the rate of 0.4 to 0.8 gal (1.06 to 2.12 lbs) per 1000 gals of metalworking fluid per day, or as needed to maintain control. Additions of this product can be made continuously or intermittently. Slug the system as required.

DIRECTIONS FOR TREATING BREWERY PASTEURIZER WATER

For controlling (or inhibiting) the growth of bacteria, fungi and yeasts in brewery pasteurizing water systems, add this product at a point in the system to insure uniform mixing.

Initial or Slug Dose: When the system is noticeably fouled, add this product at the rate of 1.1 gals (2.65 lbs) per 1000 gals of water in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add this product at the rate of 0.4 to 0.8 gal (1.06 to 2.12 lbs) per 1000 gals of water per day, or as needed to maintain control. Additions of this product can be made continuously or intermittently. Slug the system as required. Badly fouled systems must be cleaned before treatment is begun.

DIRECTIONS FOR TREATING ENHANCED OIL RECOVERY SYSTEMS

NOTE: Add this product separately to the system. Do not mix it with other additives, so as to avoid decomposition of this product due to the high pH of many additive formulations. Addition of this product 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 4-284 ppm this product (0.4 - 25.6 gallons of this product per 2400 barrels of water) depending on the severity of contamination. Additions ~~should~~ be made with a metering pump either continuously or intermittently.

CONTINUOUS FEED METHOD

When the system is noticeably fouled, add 36-284 ppm this product (3.2-25.6 gals. of this product per 2400 barrels of water) continuously until the desired degree of control is achieved. Subsequently, treat with 4-53 ppm this product (0.4-4.8 gals. of this product per 2400 barrels of water) 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 36-284 ppm this product (3.2-25.6 gals. of this product per 2400 barrels of water) 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 53-284 ppm this product (4.8 -25.6 gals. of this product per 2400 barrels of water). Additions of this product ~~should~~ 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 0.006 - 0.380 gallons this product/ 1000 gal of water in the system, 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 0.012 - 0.380 gal this product/ 1000 gal of water in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 0.006 - 0.188 gal this product/ 1000 gal of water in the system every 2 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 0.012 - 0.380 gal this product/ 1000 gal of water in the system.

Subsequent Dose: Maintain this level by pumping a continuous feed of 0.006 - 0.188 gal this product/ 1000 gal of water 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

This product 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 this product to the material or product at a concentration of 100 to 8,000 ppm by weight. This concentration is equivalent to 11.2 to 896.0 fluid ounces this product per 1,000 gallons or 85.6 to 6,848.0 milliliters this product per 1,000 liters. 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 this product at a concentration of 4.0 to 40.0 ppm by weight of water being treated, depending on the severity and contamination in the system. Addition ~~should~~ be CONTINUOUS and ~~should~~ be made with a metering pump at a point in the system where mixing will be rapid and thorough. Add this product 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

7027

Add 1.6 -6.0 ppm this product by weight of water treated. Chlorination should result in a minimum detectable residual (i.e., greater than zero but less than the NPDES permit level) Addition ~~should~~ be CONTINUOUS and made at a point just after initial chlorine mixing. Rapid mixing is necessary for maximum effectiveness. This product ~~should~~ be added at a location where a contact time of 10 minutes or longer will be provided before reaching the outfall.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a dark, cool, dry, well-ventilated area, not above 104°F (40°C), in well-closed original containers, away from energy sources, combustible organic materials, oxidizers and moisture. 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 respirator if misting occurs. 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.

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 and Disposal

{For rigid nonrefillable container less than or equal to 50 lbs}

[Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application or a mix tank and drain for 10 seconds after the flow begins to drip. 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.

Then offer for recycling, if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.]

{For rigid nonrefillable container greater than 50 lbs}

[Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application or a mix tank. Fill the container ¼ full with water. 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. Empty rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Then offer for recycling, if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.]

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 to the extent consistent with applicable law, 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 BY:

ICL-IP America, Inc.
95 MacCorkle Avenue
South Charleston, WV 25303

EPA Reg. No. 8622-63

EPA Est. No. _____

NET CONTENTS: _____ GALS.(LBS.)

[BATCH/Lot. No. _____]

