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AUG 2 1995

Mr. R.V. Hinton  
Product Information Manager  
Vinings Industries, Inc.  
3950 Cumberland Parkway  
Atlanta, Georgia 30339-4501

Dear Mr. Hinton:

Subject: AMA-30  
EPA Reg. No. 9386-11  
Your Submissions of March 7 and April 17, 1995

The amended labeling submitted on March 7, 1995 to revise the labeling for this product in accordance with PR Notice 93-10 is not acceptable. The wording included was that indicated in the PR Notice as the 1984 revision. Revise the technical data sheet and label to include the wording in section III of the enclosed PR Notice. Since the label revision submitted on April 17, 1995 contains the appropriate effluent statement, this submission will be considered as superseded.

The amendment of April 17, 1995, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable provided that you:

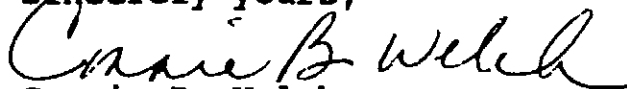
1. Submit and/or cite all data required for registration and reregistration under FIFRA sec. 3(c)(5) and sec. 4 when the Agency requires all registrants of similar products to submit such data.
2. Make the following label revision: On both the label and the technical data sheet, repeat the signal word before the first sentence in the paragraph under "Precautionary Statements".
3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

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If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,



Connie B. Welch  
Product Manager (21)  
Fungicide-Herbicide Branch  
Registration Division (7505C)

Enclosure

7505C:C.Gable:cg:7/25/95

**DIRECTIONS FOR USE**

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

**INDUSTRIAL RECIRCULATING WATER COOLING TOWERS AND EVAPORATIVE CONDENSERS:** Dosages for industrial recirculating water cooling towers or evaporative condensers will depend on the condition of the system prior to treatment initiation. Systems which are heavily contaminated should be cleaned first. Apply AMA<sup>®</sup>-30 to the cleaned system or when growth is first noticed, according to the following schedule:

**INITIAL DOSE:** Apply 13.6 fluid ounces of product per each 1,000 gallons of water in the system (120 ppm). This dose may be repeated once, twice or three times weekly or as required to control the growth of slime-forming organisms.

**SUBSEQUENT DOSE:** When microbial control is evident, add 2.18 to 4.36 fluid ounces of AMA<sup>®</sup>-30 per 1,000 gallons of water (20-40 ppm) in the system every three days or as needed.

**AIR WASHERS:** In treating air washer systems, preclean by introducing a suitable detergent solution into the system and allow air washer to run with fan off for two hours. Flush. Check all nozzles and manually clean those that are plugged. Add the product as specified under dosages for cooling towers.

**FEEDING:** AMA<sup>®</sup>-30 may be fed directly from the drum or diluted with water and fed by any suitable feed system. AMA<sup>®</sup>-30 should be dosed directly into the sump or basin or any other location where good distribution can be assured.

**CANE SUGAR MILLS:**AMA<sup>®</sup>-30 is a liquid which should be fed directly into the cane juice so that the treated juice circulates to all parts of the mill tandem. The points of addition will depend on mill design. Frequently the dosage will be split between the crusher juice and juice from the last mill. The best addition point is to juice which is circulated back to the crusher at first mill. Do not add this product to the maceration water.

AMA<sup>®</sup>-30 should be fed continuously at the rate of 10-20 parts of product per million parts of cane ground per day. 10 ppm of product is the standard dosage. This may be raised up to a maximum of 20 ppm, if necessary. Conditions warranting some increase would be when grinding cane damaged through freezing, poor weather or delays between cutting and grinding. See feeding directions on the Technical Data Sheet. Do not exceed feed rate of 4 gallons (39.2 pounds) of product per 1000 short tons of cane ground per twenty-four hours.

**BEET SUGAR MILLS:**AMA<sup>®</sup>-30 should be fed directly into the raw juice during sugar extraction of beets to keep equipment free of bacterial slime deposits. It is to be used at the rate of 10-20 ppm of raw beets sliced, and fed continuously into the pulp press water tank with a metering pump. The maximum rate to be fed is 20 ppm. Refer to table in Technical Data sheet for the proper dosage in milliliters and ounces of AMA<sup>®</sup>-30 to be used per minute. Do not exceed feed rate of 4 gallons (39.2 pounds) of product per 1000 short tons of beets sliced per twenty-four hours.

**A**  
ANTIMICROB

Active Ingredient:  
Sodium Dimethyldithiocarbamate  
Nabam (Disodium ethylenebis(2-mercaptoacetate))  
Inert Ingredients: .....  
TOTAL.....

KEEP OUT OF REACH OF CHILDREN

**STATEMENT**

**IF SWALLOWED:** Call a physician immediately. Do not induce vomiting. Rinse mouth with water. Do not eat or drink anything until advised by a physician.

**IF ON SKIN:** Wash with soap and water.

**IF IN EYES:** Flush eyes with water for at least 15 minutes. Seek medical attention if irritation persists.

EPA REGISTRATION NO. 100-100-0100

**PAPER MILLS:** Dosage will depend on the condition of the system, quality of raw water and the type of system. **FEEDING:**AMA<sup>®</sup>-30 may be fed directly into the system through a chemical pump such as an adjustable displacement type or by the recirculation system if possible in the system at such a rate as to prevent a broken system.

MA  
VININGS  
MARIE

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
AUG 2 1995

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 9386-11

**COMPOSITION:**

Active Ingredients:	30%
Sodium dimethyldithiocarbamate	15%
Disodium ethylene bisdithiocarbamate	15%
Inert Ingredients:	70%
TOTAL	100%

AMA<sup>®</sup>-30 is manufactured under carefully controlled conditions so as to minimize the formation of impurities which might affect its color or clarity.

**TYPICAL PROPERTIES:**

Appearance:	Pale yellow to amber liquid	Density:	9.6 lb/gal
Flash Point:	Over 200°F (Pensky-Martens)	Solubility:	Complete at use concentration
pH:	11.5		
Odor:	Sulfide		

**DIRECTIONS FOR USE:**

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

**INDUSTRIAL RECIRCULATING WATER COOLING TOWERS AND EVAPORATIVE**

**CONDENSERS:** Dosages for industrial recirculating water cooling towers or evaporative condensers will depend on the condition of the system prior to treatment initiation. Systems which are heavily contaminated should be cleaned first. Apply AMA<sup>®</sup>-30 to the cleaned system or when growth is first noticed, according to the following schedule:

**INITIAL DOSE:** Apply 13.6 fluid ounces of product per each 1,000 gallons of water in the system (120 ppm). This dose may be repeated once, twice or three times weekly or as required to control the growth of slime-forming organisms.

**SUBSEQUENT DOSE:** When microbial control is evident, add 2.18 to 4.36 fluid ounces of AMA<sup>®</sup>-30 per 1,000 gallons of water (20-40 ppm) in the system every three days or as needed.

**AIR WASHERS:** In treating air washer systems, preclean by introducing a suitable detergent solution into the system and allow air washer to run with fan off for two hours. Flush. Check all nozzles and manually clean those that are plugged. Add the product as specified under dosages for cooling towers

**FEEDING:** AMA<sup>®</sup>-30 may be fed directly from the drum or diluted with water and fed by any suitable feed system. AMA<sup>®</sup>-30 should be dosed directly into the sump or basin or any other location where good distribution can be assured.

**PAPER MILLS:** Dosage will vary from 0.1 to 2.0 pounds (0.04 to 0.81 quarts) of AMA<sup>®</sup>-30 per ton of finished paper depending on the type of stock, complexity of the system, quality of raw water, and type and degree of contamination.

**FEEDING:** AMA<sup>®</sup>-30 may be drip fed continuously from the drum or fed by suitable chemical pumps such as adjustable proportioning types: variable speed, positive displacement type; or by the reciprocating type. This product should be fed as early as possible in the system at such points including the hydropulper, machine chest or broke system.

**CANE SUGAR MILLS:** AMA<sup>®</sup>-30 is a liquid which should be fed directly into the cane juice so that the treated juice circulates to all parts of the mill tandem. The points of addition will depend on mill design. Frequently the dosage will be split between the crusher juice and juice from the last mill. The best addition point is to juice which is circulated back to the crusher at first mill. Do not add this product to the maceration water.

AMA<sup>®</sup>-30 should be fed continuously at the rate of 10-20 parts of product per million parts of cane ground per day. 10 ppm of product is the standard dosage. This may be raised up to a maximum of 20 ppm, if necessary. Conditions warranting some increase would be grinding of cane damaged through freezing, poor weather or delays between cutting and grinding. See feeding directions which follow.

Proper feed of AMA<sup>®</sup>-30 is best obtained through the use of a chemical feed pump such as the adjustable proportioning type, the variable speed, positive displacement type or the reciprocating type. The required dosage will depend on the average daily rate of cane ground. Refer to the chart below for proper dosage in milliliters and ounces of AMA<sup>®</sup>-30 to be used per minute.

Do not exceed feed rate of 4 gallons (39.2 pounds) of product per 1000 short tons of cane ground per twenty-four hours. The use of AMA<sup>®</sup>-30 does not replace good housekeeping. This should include regular cleaning at least once per shift. Regular hosing of mills bagacillo conveyors, and screens with hot water and steam is essential for maintaining efficient control of microbiological slime and sucrose losses.

**BEET SUGAR MILLS:** AMA<sup>®</sup>-30 should be fed directly into the raw juice during sugar extraction of beets to keep equipment free of bacterial slime deposits. It is to be used at the rate of 10-20 ppm of raw beets sliced, and fed continuously into the pulp press water tank with metering pump. The maximum rate to be fed is 20 ppm. Refer to table below for the proper dosage in milliliters and ounces of AMA<sup>®</sup>-30 to be used per minute.

The use of AMA<sup>®</sup>-30 does not replace good housekeeping. Do not exceed feed rate of 4 gallons (39.2 pounds) of product per 1000 short tons of beets sliced per twenty-four hours.

Short Tons of Cane Ground or Raw Beets Sliced Per Day	Rate of Feed for AMA®-30			
	10 ppm		20 ppm	
	<u>ML/MIN</u>	<u>OZ/MIN</u>	<u>ML/MIN</u>	<u>OZ/MIN</u>
1000	5.5	0.186	11	0.372
2000	11.0	0.372	22	0.744
3000	16.5	0.558	33	1.115
4000	22.0	0.744	44	1.487
5000	27.5	0.930	55	1.859
6000	33.0	1.115	66	2.231
7000	38.5	1.301	77	2.603
8000	44.0	1.487	88	2.974
9000	49.5	1.673	99	3.346
10000	55.0	1.859	110	3.718

**TECHNICAL ASSISTANCE:**

Our technical staff is available to assist in the application of Vinings' products. You may request assistance through your sales representative or by contacting Vinings Industries at 800-347-1542.

**STORAGE AND DISPOSAL:**  
**DO NOT CONTAMINATE WATER, FOOD OR FEED**  
**BY STORAGE OR DISPOSAL**

**STORAGE:** Protect from freezing and temperatures in excess of 140°F. Keep container closed when not in use. If contents are spilled or leaked due to container damage, collect liquid with absorbent material and dispose of in accordance with local, state and federal pesticide disposal regulations.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. 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:** Metal Containers - Triple rinse (or equivalent). 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. Plastic containers - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**PRECAUTIONARY STATEMENTS:**  
**HAZARD TO HUMANS AND DOMESTIC ANIMALS**

Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Causes moderate eye injury. Avoid contact with eyes or clothing. All industrial workers applying this product must wear coveralls over long-sleeved shirt and long pants, shoes, socks, and chemical-resistant gloves. During dilution, a chemical-resistant apron and goggles or a face shield must also be worn.

**STATEMENTS OF PRACTICAL TREATMENT:**

**IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

**IF IN EYES:** Flush eyes with plenty of water. Call a physician if irritation persists.

**ENVIRONMENTAL HAZARDS:**

This pesticide is toxic to fish. 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.

**SHIPPING POINT:**

Marietta, Georgia  
Washougal, Washington

**PACKAGING:**

30 gallon drums  
55 gallon drums  
275 and 350 gallon portabins  
Bulk