9386-11

4115/2002

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 1 5 2002

Ransom Hinton Vinings Industries, Inc. 245 TownPark Drive, Suite 200 Kennesaw, GA 30144-5515

Subject: AMA-30 EPA Reg. No. 9386-11 Your Amendment Dated 1/31/2002

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to provide an updated main label dated January 30, 2002, which revises the "First Aid" statements to those required for the product in PR Notice 2001-1, is acceptable with the following label requirements.

1. It is not clear why the use directions for "Paper Mills" on this label are much less detailed than those for the similar "Paper Mill Slime Control" use on EPA Reg. No. 9386-7. Both products have identical active ingredient percentages and should have identical use directions if these are identical paper production uses. For example, this label is missing any reference to initial dose, subsequent dose, and has a dose range from 1.33 -26.7 ounces versus 6-30 ounces on the other label. With your next amendment for this product, you must bring the paper mill use directions in this label into harmony with those on the label for EPA Reg. No. 9386-7, or explain and justify why the use directions are different for each.

2. In addition to the 20 gallon and 55 gallon containers, your application states that the product is shipped in IBC's (Intermediate Bulk Containers) and bulk shipments. The Agency understands IBC's to be commonly called "totes" (often 300 gallon plastic containers with an outer metal cage), and bulk sizes to refer to tank trucks and rail cars. The label must include precise disposal instructions that apply to IBC and bulk containers sizes. For example, IBC's and bulk containers are generally returned to the sender un-rinsed, and the label needs to mention this fact clearly.

Your amendment mentions that the "Technical Data Sheet" is not included because it does not accompany the shipped product. Please note that the data sheet and any other non-stamped pesticide product information must also be in harmony with the main label and with FIFRA regulations.

A stamped copy of the accepted label is attached for your records.

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,

Marshall Swindell, Product Manager Team 33, Regulatory Management Branch I Antimicrobials Division (7510C)

DIRECTIONS FOR USE

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

NDUSTRIAL RECIRCULATING WATER COOLING TOWERS AND

VAPORATIVE CONDENSERS: Dosages for industrial recirculating water cooling wers or evaporative condensers will depend on the condition of the system prior to eatment initiation. Systems which are heavily contaminated should be cleaned first .pply AMA[®]-30 to the cleaned system or when growth is first noticed, according to the ollowing schedule:

<u>VITIAL DOSE</u>: Apply 13.6 fluid ounces of product per each 1,000 gallons of water in the ystem (120 ppm). This dose may be repeated once, twice or three times weekly or as equired to control the growth of slime-forming organisms.

<u>UBSEQUENT DOSE</u>: When microbial control is evident, add 2.18 to 4.36 fluid ounces of MA^{\oplus} -30 per 1,000 gallons of water (20-40 ppm) in the system every three days or as needed.

<u>VIR WASHERS</u>: In treating air washer systems, preclean by introducing a suitable letergent 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 pecified under dosages for cooling towers.

EEDING: AMA[®]-30 may be fed directly from the drum or diluted with water and fed by my suitable feed system. AMA[®]-30 should be dosed directly into the sump or basin or any other location where good distribution can be assured.

CANE SUGAR MILLS: AMA[®]-30 is a liquid which should be fed directly into the cane uice 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 he crusher at first mill. Do not add this product to the maceration water.

AMA[®]-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^{\oplus}-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 ate 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^{\oplus}-30 to be used per ninute. Do not exceed feed rate of 4 gallons (39.2 pounds) of product per 1000 short tons of beets sliced per twenty-four hours.

PAPER MILLS: Dosage will vary from 0.1 to 2.0 pounds (0.04 to 0.81 quarts) of AMA[®]-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.

<u>FEEDING</u>:AMA[®]-30 may be drip fed continuously from the drum or fed by a suitable chemical pump 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.



ANTIMICROBIAL AGENT FOR INDUSTRIAL USE

Active Ingredient:

Sodium Dimethyldithiocarbamate	. 15%
Nabam (Disodium ethylene bisdithiocarbamate)	15%
Inert Ingredients:	70%
TOTAL	100%

KEEP OUT OF REACH OF CHILDREN WARNING

First Aid							
If swallowed:	· · · · · · · · · · · · · · · · · · ·						
	treatment advice.						
	 Have person sip a glass of water if able to swallow. 						
	- Don 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.						
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 doctor for treatment advice.						
lf on skin	- Take off contaminated clothing.						
or clothing:	 Rinse skin immediately with plenty of water for 15–20 						
	minutes.						
	- Call a poison control center or doctor for treatment advice.						
Contac	ct CHEMTREC at 800-424-9300 for additional information						
	See side panel for additional precautionary statements						

EPA REG. No. 9386-11 EPA EST. No. 9386-GA-1

Manufactured By



 QUALITY FIRST
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 245 TownPark Drive, Suite 200
 KENN `SAW, GA 30144-5515

PRECAUTIONA

HAZARD TO HUMANS.

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Harmful or fatal if swallowed or abso irritation. Do not get, in eyes, on skin, or of product must wear coveralls over a longchemical-resistant gloves. During dilution, shield must also be worn. Remove contarn Wash thoroughly with soap and water after tobacco.

ENVIRONMENTAL HAZARDS: This effluent containing this product into lakes, unless in accordance with the requirement System (NPDES) permit and the permittin discharge. Do not discharge effluent co previously notifying the local sewage treats State Water Board or Regional Office of the

	STORAGE /					
Do not contar	ninate water, fo					
Protect from	freezing and te					
not in use. If	contents are sp					
hsorhent mater	ial and disnos					

closed when not in use. If contents are sp liquid with absorbent material and dispos disposal regulations.

PESTICIDE DISPOSAL: Pesticide w pesticide, spray mixture, or rinsate is a viol disposed of by use according to label Environmental Control Agency, or the Ha: Regional Office for guidance.

CONTAINER DISPOSAL: Metal Cont for recycling or reconditioning, or puncture procedures approved by state and local a equivalent). Then offer for recycling or sanitary landfill, or incineration, or, if allo

ACCEPTED burned, stay out of smoke.

STORAGE:

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