

39967-64

02-23-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Heather Collins
Senior Regulatory Affairs Specialist for,
LANXESS Corporation
111RIDC Park West Drive
Pittsburgh, PA 15275-1112

FEB 23 2010

Subject: Preventol P 30
EPA Registration Number 39967-64
Your Notification Dated January 21st, 2010
EPA Received Date January 25th, 2010

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to revise the Container section as per PR Notice 2004-7, is acceptable.

The notification has been made part of the file.

If you have any questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

A handwritten signature in black ink that reads "Karen M. Leavy, Esq.".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobials Division(7510P)



February 3, 2010

VIA Email

Ms. Karen Leavy
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Luanne Jeram
Material Protection Products
Regulatory Affairs
111 RIDC Park West Drive
Pittsburgh, PA 15275-1112

Phone 412-809-4773
Fax 412-809-1068
luanne.jeram@lanxess.com
www.US.LANXESS.com

**RE: Product: Preventol P 30
Registration #: 39967-64
Letter indicating the label language submitted under Notification
for Label Change per PR Notice 2007-4 is unacceptable**

Dear Ms. Leavy:

LANXESS Corporation received a response to our Notification for label change per PR Notice 2007-4 dated December 8, 2009 which indicated our notification (dated November 9, 2009) was unacceptable.

Based on the characteristics of the product, use instructions and the containers types in which the product is sold, we feel the language as submitted is adequate. This was presented to the Agency in a January 21, 2010 letter. As a follow up to that letter please find below the EPA required statements to amend the label per notification.

"Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1011 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Please feel free to contact me at 412-809-4773 if additional information is required.

Sincerely,

Luanne Jeram
Senior Regulatory Affairs Specialist



Preventol® P 30

FOR THE PRESERVATION OF WATER-BASED PRINTING INKS, FOUNTAIN SOLUTIONS, METAL WORKING FLUIDS, ABSORBENT CLAYS, PAINTS AND OTHER EMULSION SYSTEMS, CHEMICAL TOILET DEODORANTS, DISINFECTANTS, CONSUMER, HOUSEHOLD AND INSTITUTIONAL PRODUCTS, ADHESIVES, STARCH, PIGMENT AND MINERAL SLURRIES, CONCRETE ADMIXTURES, RAW MATERIALS, SURFACTANTS, WATER BASED AGRICULTURAL PESTICIDE CONCENTRATES, PAPER MILLS – BULK PAPER, PAPER MILL PROCESS WATER, INDUSTRIAL COOLING WATER

ACTIVE INGREDIENT: 2-bromo-2-nitropropane-1,3-diol ----- 30%
INERT INGREDIENTS ----- 70%

KEEP OUT OF REACH OF CHILDREN DANGER

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER! Causes irreversible eye damage. May be fatal if swallowed or inhaled. Do not get in eyes or on clothing. Do not breathe vapor or spray mist. Wear protector eyewear such as goggles or face shield. Wash thoroughly with soap and water after handling and before eating, drinking and chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Wear a respirator with an organic-vapor removing cartridge with a filter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE pre-filter.

FIRST AID

IF SWALLOWED: Call a 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 a poison control center or doctor. Do not give anything to an unconscious person.

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 treatment advice.

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. Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a Poison Control Center or doctor for treatment advice.

The LANXESS Pittsburgh Emergency Response Telephone Number is 800-410-3063

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 the 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. Do not contaminate water by cleaning of equipment or disposal of waste.

IN CASE OF EMERGENCY, CALL: CHEMTREC 800-424-9300

EPA REGISTRATION NO: 39967-64

EPA EST.:

LANXESS

LANXESS Corporation

111 RIDC Park West Drive • Pittsburgh, PA 15275-1112

LABEL TEXT DATE: DRAFT

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Detailed directions for use can be found in the Preventol® P 30 Product Information Sheet. Obtain and read this information before undertaking the use of Preventol® P 30 in order to avoid processing mistakes.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear: Coveralls over long sleeved shirt and long pants, socks and chemical resistant footwear, goggles, face shield and chemical resistant gloves such as or made of any water-proof material. Wear a respirator with an organic-vapor removing cartridge with a filter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE pre-filter. 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 eating, 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 the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

PHYSICAL AND CHEMICAL HAZARDS

Avoid contact with metal equipment such as scoops, mills and sieves.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Product should be stored in an area that is not subject to extreme temperatures. Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed.

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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or reconditioning if appropriate. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Handle and open container in a manner as to prevent spillage. If the container is leaking, invert to prevent leakage. If the container is leaking material for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed above.

® Preventol is a registered trademark of LANXESS Corporation

INTERNATIONAL 703-527-3887

Net Contents:

Lot No.:

D/S

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LANXESS

Energizing Chemistry

Product Information

PREVENTOL[®] P 30

EPA Registration Number 39967-64

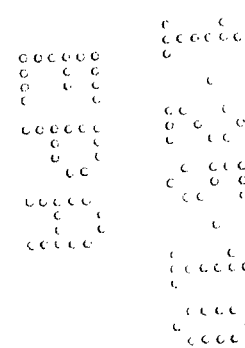
CAS Number: 52-51-7

PREVENTOL[®] P 30

PREVENTOL[®] P 30

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PREVENTOL® P 30 IS EFFECTIVE AGAINST THE GROWTH OF SLIME-FORMING, SPOILAGE, ODOR-CAUSING AND CORROSION INDUCING BATERIA AND ALGAE IN WATER-BASED PRINTING INKS, FOUNTAIN SOLUTIONS, METAL WORKING FLUIDS, ABSORBENT CLAYS, PAINTS AND OTHER EMULSION SYSTEMS, CHEMICAL TOILET DEODORANTS, DISINFECTANTS, CONSUMER, HOUSEHOLD AND INSTITUTIONAL PRODUCTS, ADHESIVES, STARCH, PIGMENT AND MINERAL SLURRIES, CONCRETE ADMIXTURES, RAW MATERIALS, SURFACTANTS, WATER BASED AGRICULTURAL PESTICIDE CONCENTRATES, PAPER MILLS – BULK PAPER, PAPER MILL PROCESS WATER, INDUSTRIAL COOLING WATER

DIRECTIONS FOR USE

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

The following guidance is given as an approximation for each use pattern, but field-testing is recommended to achieve optimum effectiveness.

GENERAL USE DIRECTIONS

To control the growth of slime-forming, spoilage, odor-causing and corrosion inducing bacteria and algae in industrial applications, PREVENTOL® P 30 can be dosed directly, or by preparing a stock solution immediately prior to application, either by open pouring (not cooling water treatment) or by metered pump. For process application treatments PREVENTOL® P 30 may be slug dosed initially when the system is not noticeably fouled and reduced to a maintenance dose once microbial control is evident. For some applications treatment may be by slug dose or by maintenance dose only. More frequent and higher dosing should be used when contamination is heavy. The recommended dosing regimes (slug/maintenance dose) and the dose rates are as indicated in the individual use area instructions.

For preservation during the manufacture, distribution, storage and use of industrial, consumer, household and institutional products PREVENTOL® P 30 is best added at any liquid phase as late as possible during the manufacturing process. It may be added by pre-dissolving in any water to be incorporated into the formulation. Add after any heating stage, or when the product has been cooled below 40°C. Ensure good mixing and even distribution throughout the product.

Do not apply this product in anyway that will contact workers or other persons.

WATER-BASED PRINTING INKS AND FOUNTAIN SOLUTIONS

During the use of fountain solutions, shock dose PREVENTOL® P 30 at 167 to 333 ppm (1.4 to 2.8 lb./1000 gallons) depending on the contamination. Apply once weekly in the fount reservoir as a normal routine or more frequently, if required.

For In-Can preservation dose PREVENTOL® P 30 at 333 to 1667 ppm based on the final formulation volume (2.8 to 14 lb./1000 gallons).

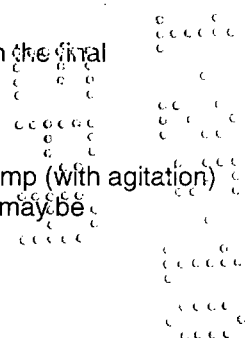
METAL WORKING FLUIDS

For use in soluble oils, semi-synthetic and synthetic fluids. Add directly to the sump (with agitation) and allow to circulate for about one hour before shutdown. PREVENTOL® P 30 may be

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incorporated in the metalworking fluid concentrate by the manufacturer who should ensure that any incompatibility will not affect the efficacy.

In diluted fluids add 333 to 3,333 ppm of PREVENTOL® P 30 (3.3 lb. of PREVENTOL® P 30 in 1000 lbs. will give a dose level of 1000 ppm).

ABSORBENT CLAYS, CORN COBS, AND GROUND WOOD

For preservation, impregnate absorbent clays, corn cobs, or ground wood with PREVENTOL® P 30 to inhibit the growth of odor causing bacteria by spraying or pouring solution of 83 to 667 ppm (0.13 to 1.06 oz av. Per 100 pounds of absorbent material).

PAINTS AND OTHER EMULSION SYSTEMS

For the preservation of acrylic, styrene-acrylic, polyvinyl acetate and other latex emulsions, latex emulsion based paints, photographic emulsions, silicone and other antifoam emulsion systems.

Add PREVENTOL® P 30 at 333 to 1667 ppm based upon the final formulation volume (2.8 to 14 lb./1000 gallons).

CHEMICAL TOILET DEODORANTS

To inhibit the growth of odor-causing bacteria in toilets, chemical deodorant concentrates should incorporate PREVENTOL® P 30 at levels of 3.3 to 93% depending upon the desired concentration level. To effectively control odor in a portable toilet, a level of 333 to 1667 ppm of PREVENTOL® P 30 is recommended.

GENERAL PRESERVATION

For the preservation of industrial products such as adhesives, starch, pigments, mineral slurries, paint and emulsion systems such as acrylic, styrene acrylic, and polyvinyl acetate, other latex emulsions, latex emulsion based paints, photographic emulsions, silicone and other antifoam emulsion systems. Consumer, household and institutional products such as dishwashing liquids, surface cleaners and polishes. Surfactants and raw materials for the manufacture of industrial and consumer products, also industrial water additive formulations for use in processes such as cooling water, process water, boiler water and waste water products.

For general preservation applications, PREVENTOL® P 30 should be dosed at 333 to 1667 ppm based on the final formulation volume (333 to 1667 g/cubic meter or 2.8 lbs. to 14 lbs./1000 gallons). For difficult to preserve formulation such as adhesives and those containing naturally derived ingredients, doses up to 3,333 ppm (0.3 lb per 100 lb. total formulation weight) may be required.

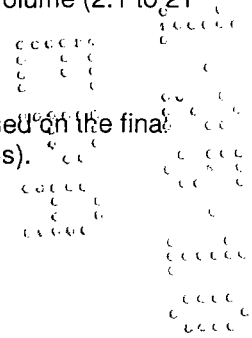
CONCRETE ADMIXTURES

For the preservation of concrete admixtures based on polycarboxylates, lignosulphonates, naphthaline sulphonates, melamine sulphonates and other systems.

Add PREVENTOL® P 30 at 250 to 2500 ppm based upon the final formulation volume (2.1 to 21 lbs./1000 gallons).

WATER BASED AGRICULTURAL PESTICIDE CONCENTRATES

For preservation, PREVENTOL® P 30 should be dosed at 333 to 1667 ppm based on the final formulation volume (333 to 1667 g/cubic meter or 2.8 lbs. to 14 lbs./1000 gallons).



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PAPER MILLS – BULK PAPER

Add PREVENTOL® P 30 directly into the hydropulper, machine chest or stock chest. Apply once weekly to once daily at 167 to 667 ppm (0.4 – 1.5 lbs. per ton).

PAPER MILL PROCESS WATER

Apply at a convenient point early in the process system (machine chest, constant head box or backwater loop system). Dose PREVENTOL® P 30 once to three times daily at 3.3 to 83 ppm in the process water. This equates to 0.07 to 1.66 lbs. per ton of finished paper or paperboard.

INDUSTRIAL COOLING WATER

For use in cooling towers, evaporative condensers, open and closed loop cooling and stored (non-potable) water, industrial and/or commercial air washers, air conditioning and humidifying systems. PREVENTOL® P 30 will reduce the biofouling of pipe work, heat exchangers, and condenser tubes and minimize microbial-induced corrosion. Apply PREVENTOL® P 30 once weekly to once monthly to the sump or tank where turbulence and flow will ensure quick dissolution. Do not apply by open pouring of liquid to cooling water systems; a metering pump delivery system is required for this use and application method.

Shock dose PREVENTOL® P 30 at 167 to 333 ppm (1.4 to 2.8 lbs./1000 gallons). Subsequent dosing can be reduced to 83 ppm.

REMARKS

If you need assistance or information, please call your nearest LANXESS representative, or our Pittsburgh office at 800-LANXESS.

**IN CASE OF EMERGENCY, CALL: CHEMTREC 1-800-424-9300
INTERNATIONAL (703)-527-3887**

HAVE THE PRODUCT CONTAINER OF LABEL WITH YOU WHEN CALLING A POISON CONTROL CENTER OR DOCTOR OR GOING FOR TREATMENT.

LANXESS Corporation
111 RIDC Park West Drive
Pittsburgh, PA 15275
412-809-1000

The conditions of your use and application of our products, technical assistance and information (whether verbal, written or by way of production evaluations), including any suggested formulations and recommendations, are beyond our control. Therefore, it is imperative that you test our products, technical assistance and information to determine to your own satisfaction whether they are suitable for your intended uses and applications. This application-specific analysis at least must include testing to determine suitability from a technical as well as health, safety and environmental standpoint. Such testing has not necessarily been done by LANXESS Corporation. All information is given without warranty or guarantee. It is expressly understood and agreed that the customer assumes and hereby expressly releases LANXESS from all liability, in tort, contract or otherwise, incurred in connection with the use of our products, technical assistance and information. Any statement or recommendation not contained herein is unauthorized and shall not bind LANXESS. Nothing herein shall be construed as a recommendation to use any product in conflict with patents covering any material or its use. No license is implied or in fact granted under the claims of any patent.

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