

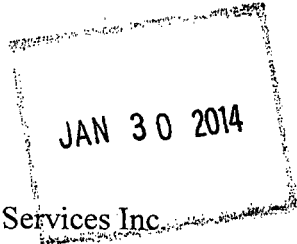
63838-16

1/30/2014

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



Address Robert Rosenwasser
c/o Enviro Tech Chemical Services Inc.
RR Consulting Services Inc.
273 Althea Ave.
Morrisville, PA 19067

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: PRIA (D-479672)
Product: EnviroBrom Tabs
EPA Registration No. 63838-16
Application Dated: May 24, 2013
Receipt Dated: July 11, 201

Dear Mr. Rosenwasser:

This acknowledges the receipt of your Amendment application dated May 24, 2013 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) Section 3(c)(7)(A), as amended.

Submission and Proposed Changes

Amend to add directions for use for "Enhanced and Secondary Oil & Gas Recovery and Water Flooding System" by Continuous Dosing Method and Intermittent or Slug Dose Method for EnviroBrom Tabs product (EPA Reg#63838-16). The original proposed label dated June 10, 2013 (pin punch 06/10/13) and it was updated on January 27, 2014 (pin punch 01/27/14).

Findings and Comments:

Based on the submitted materials, the label amendment noted above is **acceptable**. The latest amended accepted label pin punch 01/27/14.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

This latest amended label (pin punch 01/27/14) and a copy of this letter have been inserted in your file for future reference.

If you have any questions or comments concerning this letter, please contact David Liem at liem.david@epa.gov or call (703) 305-1284.

Sincerely,

A handwritten signature in black ink, appearing to read 'Demson Fuller', with a long horizontal flourish extending to the right.

Demson Fuller
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

Encl: Accepted Stamped label



SLOW RELEASE TABLETS

A MICROBICIDE, BACTERICIDE, FUNGICIDE, ALGAEICIDE AND SLICIDE USED IN TREATING WATER FOR ENHANCED OIL & GAS AND SECONDARY OIL AND GAS RECOVERY SYSTEMS, INDUSTRIAL RECIRCULATING AND EVAPORATIVE COOLERS, BASEMENT SUMPS, AIR CONDITIONING PANS, COOLING PONDS, LINED RESERVOIRS, DECORATIVE FOUNTAINS, AIR WASHING SYSTEMS, RO MEMBRANES AND METAL WORKING FLUIDS

ACTIVE INGREDIENT:
2,2-dibromo-3-nitropropionamide 95.6%
INERT INGREDIENTS 4.4%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panels for additional precautionary statements

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 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 the poison control center or doctor.

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 FOR EMERGENCY MEDICAL TREATMENT INFORMATION

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

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. INHALED OR SWALLOWED. HARMFUL IF ABSORBED THROUGH SKIN. CAUSES SKIN BURNS, PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS.

PERSONAL PROTECTIVE EQUIPMENT

- Applicators and other handlers must wear:
- Coveralls worn over long sleeved shirt and long pants
 - Chemical resistant footwear plus socks
 - Goggles (required) with or without face shield
 - Chemical resistant gloves (such as barrier laminate, neoprene rubber, nitrile rubber, or PVC)
 - Chemical resistant apron (for mixing/loading)

APPLICATION RESTRICTIONS: Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

ENGINEERING CONTROLS: When handlers are using closed metering systems the handler requirements may be reduced or modified to long-sleeved shirt, long pants, shoes and socks.

USER SAFETY REQUIREMENTS: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY INSTRUCTIONS: Users must wash hands before eating, drinking, chewing gum, using tobacco, or using toilet. User must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** To maintain product quality, store at temperatures below 95°F (35°C). Keep container tightly closed when not in use. Do not remove labels from container except for immediate use. Do not store with foods, feeds, drugs, or clothing.

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 DISPOSAL: Nonrefillable container. Do not use this container to hold materials other than pesticides or dilute pesticides (rinseate). After emptying and cleaning, it may be allowable to temporarily hold rinsate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. Clean container promptly after emptying. Offer for recycling if available.

DIRECTIONS FOR USE

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

DIRECTIONS: ENHANCED AND SECONDARY OIL & GAS RECOVERY AND WATER FLOODING SYSTEMS

Add this product at any point in the system where uniform mixing can occur. Being a slow release biocide, it is important to add the product with equipment capable of feeding this product flow proportionally to the total flow of fluid being injected into the formation.

CONTINUOUS DOSING METHOD: For controlling slime-forming, sulfate and acid-producing bacteria, yeasts, and fungi in oil and gas field water, polymer or micellar floods or other oil and gas field water systems, add 10-75 ppm active DBNPA (4-32 pounds of product) per 1,000 barrels of water depending on the severity of the contamination.

INTERMITTENT OR SLUG DOSE METHOD: When the system is noticeably fouled, add 38-190 ppm active DBNPA (15-75 pounds of product) per each 1,000 barrels of water intermittently for 4-8 hours per day and from 2-4 times per week, or as needed depending on the severity of the contamination. Adjust the amount of this product used as the microbiological conditions improves.

NOTE: For control of bacteria, yeast, and fungi in aqueous solutions specific to hydraulic fracturing (frac) operations, add 14-75 ppm active DBNPA (5-32 pounds of product) per 1,000 barrels of water.

Add anywhere upstream or directly to the chemical feed hopper containing the slickwater additives, biopolymer gel and proppant prior to injection into the formation. Uniform addition to the downhole fluid mixture will insure consistent results.

The active ingredients will slowly be released over a period of 4-7 days under most conditions. Therefore the ppm's given above are based on the total active released over this time frame.

FOR RECIRCULATING COOLING WATER: NOTE: Badly fouled systems must be pre-cleaned by following manufacturer's product instructions before treatment is begun. Direct contact of Enviro-Brom Tabs with a metal surface in the cooling system will cause local corrosion. To prevent corrosion, place the Enviro-Brom Tabs in the holder provided or

equivalent. Suspend / float it in the water so the tablet is completely submerged. Enviro-Brom Tabs are best used in the basin of the cooling system in an area with little turbulence. Avoid placing Enviro-Brom Tabs in direct sunlight. Tablets may be placed in a flow-through feeder through which cooling water or make-up water is directed. To control bacteria, fungi, and algae in clean to moderately contaminated systems, add 100 g of tablet(s) per 500-1,000 gallons of water in the system. Heavily contaminated systems may require 200 g of tablet(s) per 500-1,000 gallons of water in the system.

FOR EVAPORATIVE COOLERS (e.g. SWAMP COOLERS), BASEMENT SUMPS & AIR CONDITIONING PANS: NOTE: Badly fouled systems must be pre-cleaned by following manufacturer's product instructions before treatment is begun. Direct contact of Enviro-Brom Tabs with a metal surface in the cooling system will cause local corrosion. To prevent corrosion, place the Enviro-Brom Tabs in the holder provided or equivalent. Suspend / float it in the water so the tablet is completely submerged. To control bacteria, fungi, and algae add 20 g of tablet(s) per 5 gallons of contained water.

COOLING PONDS, LINED RESERVOIRS AND DECORATIVE FOUNTAINS: To prevent corrosion, place the Enviro-Brom Tab in the holder provided or equivalent. Suspend / float it in the water so it is completely submerged. This product may be applied at the lined reservoir, pond, or fountain inlet or at a location that permits complete diffusion into the water at maximum retention time before reaching the outlet. To control bacteria, fungi, and algae in clean to moderately contaminated systems, add 100 g of tablet(s) per 500-1,000 gallons of water in the system. Heavily contaminated systems may require 200 g of tablet(s) per 500-1,000 gallons of water in the system.

AIR WASHER SYSTEMS: Badly fouled systems must be cleaned before treatment is begun. Only use this product in industrial air washer systems that maintain effective mist eliminating components. To control slime forming bacteria and fungi add 100 g of tablet(s) per 500-1,000 gallons of water in the system. When the system is noticeably fouled, add 200 g of tablet(s) per 500-1,000 gallons of water in the system.

NON-POTABLE WATER REVERSE OSMOSIS SYSTEMS: This product may be used to control bacteria and reduce biofouling in industrial membrane systems, including UF and NF systems. Acceptable applications include boiler feedwater, wastewater, electronics and industrial membrane systems. Add 100 g of tablet(s) per 500-1,000 gallons of water. When the system is noticeably fouled, add 200 g of tablet(s) per 500-1,000 gallons of water in the system.

TREATING METAL WORKING FLUIDS: This product is an effective antimicrobial treatment for metal working and lubricating fluids that are water soluble. The point of addition of this product is recommended at the fluid collection tank. Add 100 g of tablet(s) per 500-1,000 gallons of water. When the system is noticeably fouled, add 200 g of tablet(s) per 500-1,000 gallons of water in the system.

MANUFACTURED BY:

Synco Tech Chemicals, Inc.
500 Minnow Way, Memphis, TN 38117
(209) 58-9576

EPA Reg. No. 63898-16

EPA Reg. No. 63898-16
EPA Est. No. 63898-CA-9-0 2014 EB Tabs VS

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this product is being sold in interstate commerce in violation of the Federal Insecticide, Fungicide, and Rodenticide Act, 7 U.S.C. 136-136c, and the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. 321-322c. EPA Reg. No. 63898-16

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