

63838-16

8/4/2014

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms. Tina Rodrigues, Regulatory Affairs Manager
Enviro Tech Chemical Services, Inc.
500 Winmoore Way
Modesto, CA 95358

AUG 4 2014

Subject: FQPA 332 Minor Label Changes
Enviro-Brom Tabs
EPA Registration Number: **63838-16**
Application Date: May 9, 2014
Application Receipt: May 19, 2014

Dear Ms. Rodrigues:

This acknowledges receipt of your Notification, submitted under the provisions of FIFRA 3 (c) 9.

Purpose of the Notification:

Remove "Water Flooding" under Enhanced Oil & Gas section of the Product Label;
Remove the "Evaporative Coolers, Basement Swamps, & Air Conditioning Pans" section but
move only the phrase "Evaporative Coolers" to the Recirculating Cooling Water" section of the
Product Label;
Add statement "Not for use in California" to the "Cooling Ponds, Lined Reservoirs, and
Decorative Fountains" section of the Product Label.

General Comments:

Based on the review of the information submitted, the following comments apply.

The Notification is **Acceptable**.

A copy of the accepted Notification is attached in **Regulatory File Jacket 63838-16** for future
reference.

If you have questions or comments with regard to this Agency Letter, please contact Killian Swift by email at Swift.Killian@epa.gov or by telephone at 703-308-6346. When you are submitting information or data in response to this Agency Letter, please send a copy of this Agency Letter with your response in order to facilitate processing.

Sincerely yours,



Demson Fuller
EPA Product Manager 32
Regulatory Management Branch II
Antimicrobials Division 7510P

May 9, 2014

Document Processing Desk NOTIF
Office of Pesticide Programs (7504P)
Antimicrobial Division (7510P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

RE: EPA Reg. No. 63838-16, Notification

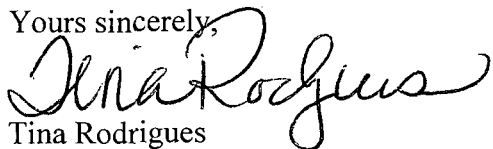
Dear Sir or Madam,

This applicant respectfully requests that the Agency allow us to make the following changes (recommended by CDPR) to our Enviro-Brom Tabs (EPA Reg. No. 63838-16) label in order to get California approval:

- Remove "Water Flooding" under the Enhanced Oil & Gas section of the label
- Remove the "Evaporative Coolers, Basement Swamps, & Air Conditioning Pans" section but move only the phrase "Evaporative Coolers" to the "Recirculating Cooling Water" section of the label because evaporative coolers are in fact smaller recirculating water systems.
- Add the statement "Not for use in California" to the "Cooling Ponds, Lined Reserviors, and Decorative Fountains" section of the label.

Please don't hesitate to call if you have any questions.

Yours sincerely,



Tina Rodrigues
Regulatory Affairs
Enviro Tech Chemical Services, Inc.
209-232-2208
trodriques@envirotech.com

Enclosures:

- 8570-1 (Application form for pesticide registration)
- 3 copies of amended label

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United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number 63838-16	2. EPA Product Manager Demson Fuller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Enviro-Brom Tabs	PM # 32	
5. Name and Address of Applicant (Include ZIP Code) Enviro Tech Chemical Services, Inc 500 Winmoore Way Modesto, CA 95358	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg No. Product Name	
<input type="checkbox"/> Check if this is a new address		

Section - II

<input type="checkbox"/> Amendment – Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
Notification to:

- Remove "Water Flooding" under the Enhanced Oil & Gas section of the label
- Remove the "Evaporative Coolers, Basement Swamps, & Air Conditioning Pans" section but move only the phrase "Evaporative Coolers" to the "Recirculating Cooling Water" section of the label
- Add the statement "Not for use in California" to the "Cooling Ponds, Lined Reservoirs, and Decorative Fountains" section of the label.

Contact: Tina Rodrigues, trodrigues@envirotech.com, 209-232-2208, Fax: 209-581-9653

Section III

1. Material This Product Will be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
*Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wt	No. per container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Poly Bags in Poly Container		5. Location of label directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph	<input type="checkbox"/> Other _____	
			<input checked="" type="checkbox"/> Paper glued		
			<input type="checkbox"/> Stenciled		

Section IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Tina Rodrigues	Title REGULATORY AFFAIRS	Telephone No. (Include Area Code) 209-2332-2208
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law		6. Date Application Received
2. Signature 	3. Title REGULATORY AFFAIRS MGR.	
4. Typed Name Tina Rodrigues	5. Date May 9, 2014	



SLOW RELEASE TABLETS

A MICROBICIDE, BACTERICIDE, FUNGICIDE, ALGAECIDE, AND SLICICIDE, USED IN TREATING WATER FOR ENHANCED OIL & GAS AND SECONDARY OIL AND GAS RECOVERY SYSTEMS, INDUSTRIAL RECIRCULATING AND EVAPORATIVE COOLERS, 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. 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 inhaled	<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 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 Do not give anything by mouth to an unconscious person
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 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 Do not give anything by mouth to an unconscious person
If swallowed	<ul style="list-style-type: none"> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. YOU MAY ALSO CONTACT: 1-800-426-9233 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. MAY BE FATAL IF SWALLOWED. HARMFUL IF INHALED OR 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 tablet(s) 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 (rinsate). 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: 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, sulfide 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 condition improves.

NOTE: For control of bacteria, yeast, and fungi in aqueous solutions specific to hydraulic fracturing (frac) operations, add 14-75 ppm active DBNPA (5.5-32 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 actives released over this time frame.

FOR RECIRCULATING COOLING WATER AND EVAPORATIVE COOLERS: 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 Tab(s) 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.

COOLING PONDS, LINED RESERVOIRS AND DECORATIVE FOUNTAINS: (Not for use in California) To prevent corrosion, place the Enviro-Brom Tab(s) in the holder provided or equivalent. Suspend / float it in the water so the tablet 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.

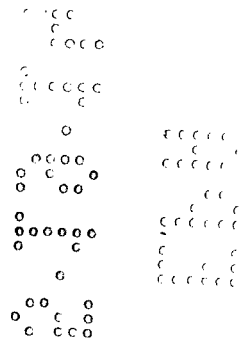
MANUFACTURED BY:
Enviro Tech Chemical Services, Inc.
500 Winmoore Way, Modesto, CA 95358
(209) 581-9576

EPA Reg. No. 63838-16
EPA Est. No. 63838-CA-01: 63838-AR-001

043 EB Tabs V3a

NOTIFICATION
Date Reviewed: _____
Reviewed By: _____

July 9, 2014
Kilian Swift



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