



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 16, 2018

Ms. Tina Rodrigues
Regulatory Affairs Manager
Regulatory Affairs
Enviro Tech Chemical Services, Inc.
500 Winmoore Way
Modesto, CA 95398

Subject: PRIA Label Amendment – Add New Use for Horizontal Floor Drains, Troughs,
Pits and Drain Areas
Product Name: Enviro-Brom Tabs
EPA Registration Number: 63838-16
Application Date: January 26, 2018
Decision Number: 537943

Dear Ms. Rodrigues:

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable under FIFRA Section 3(c)(7)(B), subject to the following conditions:

1. You must submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.
2. You are required to comply with the data requirements described in the DCI or EDSP Order identified below:
 - a. 2,2-dibromo-3-nitrilopropionamide GDCI-101801-1171

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI or EDSP Order listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:

http://www.epa.gov/oppsrrd1/contacts_prd.htm

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. 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.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). If you have any questions, please contact Ben Chambliss by phone at (703) 308-8174, or via email at chambliss.ben@epa.gov

Sincerely,



Demson Fuller, Product Manager 32
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure: Stamped Label

EnviroBrom Tabs

SLOW RELEASE TABLETS

A NON-PUBLIC HEALTH MICROBIOCIDIC, NON-PUBLIC HEALTH BACTERICIDE, NON-PUBLIC HEALTH FUNGICIDE, ALGAECIDE AND SLIMICIDE, USED IN TREATING WATER FOR ENHANCED OIL & GAS AND SECONDARY OIL AND GAS RECOVERY SYSTEMS, FOR TRENCH FLOOR DRAINS, TROUGHS, PITS IN THE DAIRY, MEAT, POULTRY, BEVERAGE AND FOOD PROCESSING INDUSTRIES, 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.
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 poison control center or doctor immediately for treatment advice
If swallowed	<ul style="list-style-type: none"> 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 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
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. CAUSES SKIN BURNS. MAY BE FATAL IF SWALLOWED. HARMFUL IF INHALED OR ABSORBED THROUGH SKIN. 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 (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:

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 (18-145 100 g tablets) per 1,000 barrels of water depending on the severity of the contamination. For smaller pack sizes or dosing; add 0.2-1.6 pounds of product per 50 barrels of water (1-7 100 g tablets).

INTERMITTENT OR SLUG DOSE METHOD: When the system is noticeably fouled, add 38-190 ppm active DBNPA, 15-75 pounds of product (68-340 100 g tablets) per 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. For smaller pack sizes or dosing; add 0.75-3.75 pounds of product per 50 barrels of water (4-17 100 g tablets).

NOTE: For control of bacteria, yeast, and fungi in aqueous solutions of biopolymer used in flooding operations, add 15-75 ppm active DBNPA, 6-32 pounds of product (27-145 100 g tablets) per 1,000 barrels of water. For smaller pack sizes or dosing; add 0.3-1.6 pounds of product per 50 barrels of water (2-7 100 g tablets).

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 TRENCH FLOOR DRAINS, TROUGHS, PITS AND WET/MOIST DRAIN AREAS IN THE DAIRY, MEAT, POULTRY, BEVERAGE AND FOOD PROCESSING INDUSTRIES: This product is an effective, time released antimicrobial treatment against non-public health microorganisms for use in drains or areas that receive occasional or continuous water flow.

To use, clean and sanitize drains and troughs, following normal plant environmental protocol. Add 100 g of tablet(s) per every 414 gallons of water flowing per location to achieve 60.63 ppm active DBNPA. Using an appropriate test kit, confirm that the residual ppm DBNPA is 60.63 ppm or greater at least 15 seconds after addition of tablet(s) into drains, troughs or pits receiving continuously flowing water, and then again after a 5 minute contact time. The residual ppm DBNPA should be monitored daily to maintain the appropriate level of DBNPA. Depending on water temperature

and flow, tablets typically last 5-12 days. Because the use of this product can vary considerably depending on the type of facility, it is recommended that each facility routinely test for the microorganism(s) of their concern to determine how many and when tablets are required for acceptable control.

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 Tabs 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:
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 500 Winmore Way, Modesto, CA 95358
 (209) 581-9576

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

043 EB Tabs V4e
 Lot #:

