

67420-2

10/9/2010

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



Office of Pesticide Programs

OSP Microcheck Inc.
C/O Delta Analytical Corporation
12520 Prosperity Drive, Suite 160
Silver Spring, Md
20904

OCT - 9 2010

Attention: Jeff Jones

Subject: 2K7 Water Soluble Paks
EPA Registration No: 67420-2
Amendment Dated May 18, 2010

This will acknowledge receipt of your amendment submitted under the provision of the PR notice 98-10 Federal Insecticide, Fungicide and Rodenticide Act (FIFRA),

Proposed Amendment

- To add alternate Confidential Statement of Formula with new source of active ingredient.

General Comments

Based on a review of the submitted material, the following comments apply:

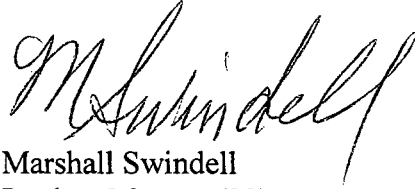
The Alternate Confidential Statement of Formula (A) dated 5/18/2010, is in compliance with PR Notice 98-10 and is acceptable, provided the following label changes are made.

- Under the "Personal Protective Equipment (PPE)" section of the product label, change "after handling" to read "after handling and before eating drinking, chewing gum, using tobacco, or using the toilet."

stamped copy of the label is enclosed for your records.

Should you have any questions or comments concerning this letter, please contact Zebora Johnson at (703) 308-7080.

Sincerely

A handwritten signature in black ink, appearing to read "M. Swindell". The signature is fluid and cursive, with the first name "Marshall" and last name "Swindell" clearly distinguishable.

Marshall Swindell
Product Manger (33)
Regulatory Management Branch I
Antimicrobial's Division (7501P)

2K7 Water Soluble Paks

2K7 Water Soluble Paks is a concentrated free-flowing crystalline solid microbiocide for use in controlling bacteria and algae found in industrial applications, and as a preservative to inhibit bacterial spoilage during manufacture, distribution, use and storage of industrial, consumer, household and institutional products. Not for the control of algae in the State of California.

ACTIVE INGREDIENT:

2-bromo-2-nitropropane-1,3-diol 98.7%

OTHER INGREDIENTS:

1.3%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
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.• 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 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 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 first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-832-4357 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

Corrosive. Causes eye damage and skin burns. May be fatal if swallowed or inhaled. Harmful if absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe dust. For handling activities: use dust/mist filtering respirator (MSHA/NIOSH APPROVED NUMBER PREFIX TC-21C) or a NIOSH approved respirator with any N, R, P, or HE pre filter. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Coveralls over long sleeved shirt and long pants, socks and chemical resistant footwear, goggles or face shield, and chemical resistant gloves such as rubber or made out of any water-proof material. Do not apply this product in a way that will contact workers or other persons. Wash thoroughly with soap and water after handling. Discard clothing or other absorbent materials that may have been heavily contaminated with the product's concentrate. Remove lightly contaminated clothing and wash separately from other laundry using detergent and hot water before re-use.

USER SAFETY REQUIREMENTS

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 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 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 discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the 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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Keep away from heat.

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 DISPOSAL

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Triple rinse (or equivalent) then offer drum for recycling or reconditioning, or puncture. Dispose of drum and liner in a sanitary landfill, or by incineration, if allowed by State and local authorities. If burned, stay out of smoke.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELLING.

GENERAL USE DIRECTIONS

To control the growth of slime-forming, spoilage, odor-causing and corrosion inducing bacteria and algae in industrial applications 2K7 Water Soluble Paks 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 2K7 Water Soluble Paks may be slug dosed initially when the system is noticeably fouled, and reduced to a maintenance dose once microbial control is evident. For some applications treatment may be by slug dose only, or by maintenance dose only. More frequent and higher dosing should be used where contamination is heavy. The recommended dosing regimes (slug/maintenance dose) and the dose rates are as indicated in the individual use area instructions. For use of cold water soluble bags (PVA film) 1 x 0.5 kilo (1.1023 lb) bag/1300 gallons is equivalent to 100 ppm.

For preservation during the manufacture, distribution, storage and use of industrial, consumer, household and institutional products, 2K7 Water Soluble Paks are 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 cooled below 40°C. Ensure good mixing and even distribution throughout the product.

ACCEPTED

EPA REG. NUMBER 67420-2

with COMMENTS
EPA EST. NUMBER 67420-CN-01
NET CONTENTS: SEE PACKAGE
EPA Letter Dated:

OCT - 9-12-2001
OSP MICROCHECK INC
15 - 27 AVENUE NE, CALGARY, AB T2E 7E1

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
registered under EPA Reg. No. 67420-2

INDUSTRIAL RECIRCULATING COOLING WATER

For use in recirculating cooling towers (not once-through), evaporative condensers, open and closed loop cooling and stored (non-potable) water, industrial and/or commercial air washers, air conditioning and humidifying systems. 2K7 Water Soluble Paks will reduce the biofouling of pipework, heat exchanges, condenser tubes and minimise microbial corrosion. Apply 2K7 Water Soluble Paks once weekly to once monthly to the sump or tank where turbulence will ensure quick dissolution. Do not apply by open pouring of liquid to cooling towers and evaporative condensers.

Shock dose 2K7 Water Soluble Paks at 50 to 100 ppm (0.42 to 0.84 lb/1000 gallons). Subsequent dosing can be reduced to 10 ppm. For small packages a 40g sachet in 200 gallons (or 4g in 20 gallons) will achieve 50 ppm.

OIL PROCESS WATERS

For use in oil and gas well injection and formation waters 2K7 Water Soluble Paks should be injected at any convenient point at 25-100 ppm (0.009 to 0.036lb/barrel) from once per week to once per month depending on the severity of contamination.

OIL AND GAS FLUIDS

For preservative use in both terrestrial and offshore drilling muds and packer fluids to control contamination and degradation of a wide range of gels and fluids including fracturing, enhanced oil recovery, injection, drilling, waterflood, workover and completion fluids. Add 2K7 Water Soluble Paks at 50-100 ppm (0.018 to 0.036 lb/barrel).

For well squeeze fluids add 2K7 Water Soluble Paks at 25-200 ppm.

OIL AND GAS PIPELINE AND TANK MAINTENANCE

For use in water bottoms in crude and refined hydrocarbon storage tanks, piping and transportation systems. Inject 2K7 Water Soluble Paks directly into the water bottom or pipeline, or add to the hydrocarbon phase.

Treat once daily for pipeline maintenance to once every one or two months for both storage and transportation systems. 2K7 Water Soluble Paks should be applied to achieve 25-200 ppm in the aqueous phase. Add higher concentrations to the hydrocarbon phase, which will result in longer term protection by gradual diffusion into the water phase. Dose will depend on the volume of crude or oil and the expected water fraction.

PAPER MILL PROCESS WATER

Apply at a convenient point early in the process system (machine chest, constant head box or backwater loop system). Dose 2K7 Water Soluble Paks once to three times daily at 1 to 25 ppm in the process water. This equates to 0.02 to 0.5 lb per ton of finished paper or paperboard.

PAPER MILLS - BULK PAPER

Add 2K7 Water Soluble Paks directly into the hydropulper, machine chest or stock chest. Apply once weekly to once daily at 50 to 200 ppm (0.1-0.4 lb per ton).

WATER BASED PRINTING INKS AND FOUNTAIN SOLUTIONS

During the use of fountain solutions, shock dose 2K7 Water Soluble Paks at 50-100 ppm (0.42 to 0.84 lb/1000 gallons) depending on the contamination. Apply once weekly in the fountain reservoir as a normal routine or more frequently if required.

For In-can preservation dose 2K7 Water Soluble Paks at 100 to 500 ppm based on the final formulation volume (0.84 to 4.2 lb/1000 gallons).

STARCH, PIGMENT AND MINERAL SLURRIES

For preservation, apply 2K7 Water Soluble Paks to water based suspensions at 100 to 500 ppm based on the final formulation volume (0.84 to 4.2 lb/1000 gallons).

Not for use in pigments in the State of California.

CHEMICAL TOILET DEODORANTS

Incorporate 2K7 Water Soluble Paks at levels of 1-28% in deodorant concentrates. To effectively control odor in a portable toilet, use 100-500 ppm (0.84 to 4.2 lb/1000 gallons).

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 2K7 Water Soluble Paks at 100 to 500 ppm based on the final formulation volume (0.84 to 4.2 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. 2K7 Water Soluble Paks may be incorporated in metalworking fluid concentrate by the manufacturer who should ensure that any incompatibility will not affect efficacy. In diluted fluids add 100 to 1000 ppm of 2K7 Water Soluble Paks (1.0 lb of 2K7 Water Soluble Paks in 1000 lb will give a dose level of 1000 ppm).

ADHESIVES

For preservation, add 0.1-0.5 lb of 2K7 Water Soluble Paks per 100 lb total formulation weight (1000 to 5000 ppm).

ACCEPTED
with COMMENTS

EPA Letter Dated: 9/2/2000

For preservation, impregnate absorbent clays by spraying or pouring solutions of 25-200 ppm of 2K7 Water Soluble Paks (0.04 - 0.32 oz av per 100 pounds of clay).

WATER BASED AGRICULTURAL PESTICIDE CONCENTRATES

Do not use for applications involving direct or indirect food or drinking water contact.

For preservation, 2K7 Water Soluble Paks should be dosed at 100 to 500 ppm based on the final formulation volume (100 to 500g/cubic meter or 0.84 to 4.2 lbs/1000 gallons).

CONSUMER, HOUSEHOLD AND INSTITUTIONAL PRODUCTS; SURFACTANTS AND RAW MATERIALS

Do not use for applications involving direct or indirect food or drinking water contact.

For preservation of products such as dishwashing liquids, surface cleaners, polishes; bulk ionic, nonionic, amphoteric and cationic surfactants and raw materials supplied for the manufacture of industrial and consumer products, 2K7 Water Soluble Paks should be dosed at 100 to 500 ppm based on the final formulation volume (100 to 500g/cubic meter or 0.84 to 4.2 lbs/1000 gallons).

CONDITIONS OF SALE AND WARRANTY

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labelling, all of which are beyond the control of the Seller. All such risks shall be assumed by the Buyer. The manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to above.

THE MANUFACTURER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

The manufacturer offers this product, and the Buyer and User accept it, subject to the foregoing Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorised representative.

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,

registered under EPA Reg. No. 67420-2

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