

67869-17

10/14/2009

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OCT 14 2009

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



United States  
Environmental Protection  
Agency

**Office of Pesticide Programs**

Verichem, Inc.  
3499 Grand Avenue  
Pittsburgh, PA 15225

Attention: Colleen M. Snyder, Manager  
Regulatory Affairs

Subject: N948  
EPA Registration No. 67869-17  
Notification Dated September 15, 2009

This will acknowledge receipt of your notification in response to the Agency's deficiency letter dated July 15, 2009 to correct the proper container disposal statement for Non-Refillable containers as per PR Notice 2007-4, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062.

Sincerely

A handwritten signature in cursive script, appearing to read "M Swindell".

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)

2083



**VERICHEM**

3499 Grand Avenue • Pittsburgh, PA 15225  
Tel. (412) 331-7299 • Fax (412) 331-7884

September 15, 2009

Mr. Marshall Swindell  
Product Manager #33  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
US Environmental protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington VA 22202-4501

RE: Deficiency Response to Your Letter Dated July 15, 2009. Notification PR Notice 98-10 (II)(G) Labeling Notification; Storage and Disposal Statements for an Antimicrobial Product. N948 (EPA Reg. # 67869-17)

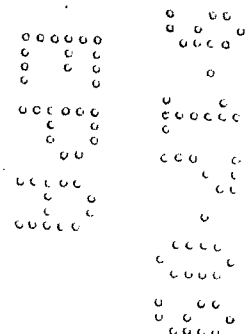
Dear Marshall:

Enclosed you will find documentation to respond to your deficiency letter dated July 15, 2009 to correct the proper container disposal statement for Non-Refillable containers as per PR Notice 2007-4 and PR Notice 98-10 (II)(G) for an Antimicrobial Product, N948 (EPA Reg. #67869-17). There have been no additional changes made to this label. Specifically enclosed for you consideration is:

One (1) copy of EPA letter dated July 15, 2009  
One (1) copy of the proposed product label

My best,

Colleen M Snyder  
Manager of Regulatory Affairs  
enclosures



## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**DANGER PELIGRO:** Fatal if inhaled. Corrosive. Causes irreversible eye damage or skin burns. May be fatal if absorbed through skin. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Remove contaminated clothing and wash before reuse.

### FIRST AID:

**Have the product container or label with you when calling a poison control center or doctor, or going for treatment.**

**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 by mouth to an unconscious person.

**If in Eyes:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 15 minutes, then continue rinsing eyes. Call a poison control center or doctor for treatment advice.

**If Inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**If on Skin or Clothing:** Take off contaminated clothing. Rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

### NOTICE TO BUYER

Buyer assumes all risks of use and handling which are at variance in any way with the directions hereon. There are no quantities, which extend beyond the description on this label.

### ENVIRONMENTAL HAZARDS

This product 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 local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

# N-948®

**FUNGICIDE FOR FORMULATING  
(BACTERICIDES, FUNGICIDES and/or  
ALGICIDES) ONLY**

**MANUFACTURING USE PRODUCT**

### Active Ingredients:

Methylene Bis Thiocyanate ..... 99%

Inert Ingredients: ..... 1%  
100%

**Keep Out of Reach of Children**



## POISON!

**SEE SIDE PANEL FOR PRECAUTIONARY STATEMENTS**

LOT NO. \_\_\_\_\_

**EPA Reg. No. 67869-17**

**EPA Estab. No. 67869-PA-01**

**EPA Estab. No. 083553-CHN-001**

**NET WEIGHT \_\_\_\_\_ LBS / GALS.**

Made in U.S.A.

SOLD BY:



## VERICHEM

**VERICHEM INC.**  
3499 Grand Avenue  
Pittsburgh, PA 15225

Final Approved 88-9/09

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Only for formulation into an end use product for use in:

**Industrial process and water systems such as:**  
Industrial preservatives with oil recovery drilling muds/packer fluids (both off-shore and/or terrestrial sites);  
Air washer water systems;  
Commercial/Industrial water cooling systems;  
Evaporative condenser water systems;  
Heat exchanger water systems;  
Industrial auxiliary water systems;  
Industrial scrubbing systems;  
Industrial waste disposal systems;  
Pulp/paper mill water systems.

### Materials preservatives such as:

Adhesives, industrial; Coatings, industrial;  
Emulsions, resin/latex/polymer;  
Secondary oil recovery injection water;  
Sewage systems;  
Pasteurized/warmer/cannery cooling water systems;  
Reverse osmosis water systems;  
Fuel/oil storage tank bottom water additive;  
Metal working cutting fluid; Paper/paper products;  
Specialty industrial products; and  
Wet-end additives/industrial processing chemicals.

## STORAGE AND DISPOSAL

**PROHIBITIONS:** Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Keep away from heat and flame. Do not reuse empty container.

**PESTICIDE STORAGE:** Keep container tightly closed when not in use. Do not store near food or feedstuffs. Can be stored at temperatures as low as minus 50°F.

**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 the label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA regional Office for guidance.

**Nonrefillable Container. Do not refill or reuse container.** Triple rinse as follows: Empty remaining contents into application equipment or mix tank. Tip container on its side and roll it back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn container over onto its other end and tip it back and forth several times. Empty the rinsate into the application equipment or mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

**FIBER DRUMS WITH LINERS:** 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.

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