

67869-19

10/14/2009

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



Office of Pesticide Programs

Verichem, Inc.
3499 Grand Avenue
Pittsburgh, PA 15225

Attention: Colleen M. Snyder, Manager
Regulatory Affairs

Subject: N521 P
EPA Registration No. 67869-19
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 black ink that reads "Marshall Swindell".

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



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. N521 P (EPA Reg. # 67869-19)

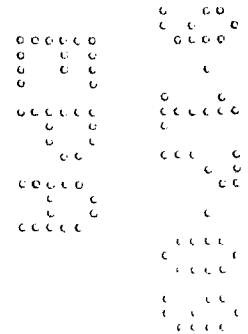
Dear Marshall:

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, N521 P (EPA Reg. #67869-19). 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

WARNING: May be harmful if swallowed. Avoid contact with skin, eyes or clothing. In case of contact, immediately flush eyes with plenty of water. Get medical attention if irritation persists. May cause allergic skin reaction. May form hazardous vapors on contact with water. Keep dry. Do not breathe dust or vapors. Use with adequate ventilation.

FIRST AID:

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.

HOTLINE 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 1-800-778-5462 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal may contraindicate the use of gastric lavage.

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.

RECOMMENDATIONS

NOTE: N-521® P should not be used in formulations containing mercurials or other components that are not compatible with sulfur compounds. For further information on N-521® P, contact VERICHEM, 3499 Grand Avenue, Pittsburgh, PA 15225, (412) 331-7299.

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.

N-521® P

Fungicide/Bactericide

**Inhibits and controls growth of
slime forming fungi and bacteria**

PRESERVES AQUEOUS SYSTEMS

Active Ingredient:

Tetrahydro-3,5-dimethyl-2H- 1,3,5-thiadiazine-2-thione	98%
Inert Ingredients	2%
	100%

WARNING

- KEEP OUT OF REACH OF CHILDREN
- MAY BE HARMFUL IF SWALLOWED

LOT NO. _____

**EPA Reg. No. 67869-19
EPA Est. No. 67869-PA-1
EPA Est. No. 1448-TN-1
EPA Est. No. 1448-MO-1**

NET WEIGHT _____ LBS / GALS.

Made in U.S.A.

SOLD BY:



VERICHEM

VERICHEM INC.

3499 Grand Avenue
Pittsburgh, PA 15225

N-521® P is a Registered TM of Verichem Inc., Pgh., PA

Final Approved 41-9/09

GENERAL DIRECTIONS FOR USE

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

N-521® P is recommended for use in paper and paper board processing and other applications such as clay processing and processing of aqueous suspensions and dispersions. N-521® P is effective in inhibiting the growth of fungi and bacteria which cause microbiological degradation and slime formation in slurries and high viscosity suspensions (starches, adhesives, clay slurries, glues, coating, resin emulsions, etc.) during processing at use levels of 0.01 to 0.5% by weight. This material can be packaged in pre-measured water-soluble poly-vinyl-plastic bags for accurate additions and safe handling. Add 1 to 50 pre-measured PVA one pound bags per 10,000 lbs of material. Actual use levels required for the preservation of specific formulations will vary depending upon the ingredients, temperature, storage conditions, and time and should be determined by actual test. N-521® P is intended for use as a preservative during processing for preservation. N-521® P should be added at a point in the processing where there will be sufficient time and agitation for thorough dispersion.

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 container.

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 late 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.

PVA BAGS: Water soluble bags are dissolved completely in the processes. Unused product should be disposed of according to pesticide disposal instructions. Obtain and read the Material Safety Data Sheet Section 13.

The information on this label is offered solely for your information, consideration, and investigation and represents our current data and best opinion as to the proper use of this product under normal conditions. Any use of the product which is not in conformance with this label or which involves using the product in combination with any other product or any other process is the responsibility of the user. This information is provided without warranties, either express or implied, and we assume no responsibility for the accuracy or completeness of the data contained herein.

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