

OCT 14 2009

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 PAC 24  
EPA Registration No. 67869-20  
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, appearing to read "M. 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 PAC 24 (EPA Reg. # 67869-20)

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 PAC24(EPA Reg. #67869-20). 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

#### ANGER!

**CORROSIVE. CAUSES EYE AND SKIN DAMAGE.** Harmful if swallowed, inhaled, or absorbed through the skin. May cause allergic skin reaction. Do not get in eyes, on skin, or clothing. Wear goggles or face shield, rubber gloves, and apron when handling. May form hazardous vapors on contact with water. Do not breathe spray or vapor mist. Use with adequate ventilation. Wash thoroughly after handling.

#### IST AID:

ave 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 warranties, which extend beyond the description on this label.

#### IRONMENTAL 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.

**BEFORE USING, READ THE MATERIAL SAFETY DATA SHEET (MSDS) FOR THIS PRODUCT.**  
**IN CASE OF CHEMICAL EMERGENCY, CALL**  
**CHEMTREC: (800) 424-9300.**

# N-521® PAC-24

## FUNGICIDE/BACTERICIDE

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

### PRESERVES AQUEOUS SYSTEMS

#### Active Ingredient:

Tetrahydro-3,5-dimethyl-2H- 1,3,5-thiadiazine-2-thione .....	24%
(present as sodium salt) .....	76%
<b>INERT INGREDIENTS .....</b>	<b>100%</b>

### KEEP OUT OF REACH OF CHILDREN

## DANGER! CORROSIVE

**CAUSES EYE AND SKIN DAMAGE**

**EPA Reg. No. 67869-20**

**EPA Estab. No. 67869-PA-1**

**EPA Est. No. 1448-TN-1**

**EPA Est. No. 1448-MO-1**

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

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

Made in U.S.A.



## VERICHEM

#### VERICHEM INC.

3499 Grand Avenue  
Pittsburgh, PA 15225  
(412) 331-7299

Final Approved 43-09/09

## DIRECTIONS FOR USE

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

### FOR INDUSTRIAL USE ONLY

## RECOMMENDATIONS

**For Slime control in Pulp and Paper Mill systems:**

**DOSAGE:** N-521® PAC-24 is effective in inhibiting the growth of slime forming fungi and bacteria in pulp and paper mill systems at use levels of 5-20 fluid ounces per ton of finished product. The exact amount necessary for effective control will vary depending on the ingredients, temperature, and equipment used in the mill system and should be determined by actual test. Systems which show considerable slime fouling should be cleaned thoroughly prior to treatment.

**METHOD OF ADDITION:** N-521® PAC-24 can be added directly from drums by pumps or gravity feed to the wet end of the mill system. Continuous flow by metering pumps is preferred to ensure adequate concentrations. Shock addition is to be avoided.

**For the Preservation of Slurries and High Viscosity Suspensions:**

**DOSAGE:** N-521® PAC-24 is effective as a preservation in aqueous systems at levels of 0.05 to 0.1% based on the total formulation in slurries of starch, clay paper coating, and high viscosity suspensions (e.g. adhesives, resin emulsions, glues, etc.). The exact amount necessary for the preservation of specific formulations will vary depending upon the ingredients, storage time, temperature, etc., and should be determined by actual test.

**METHOD OF ADDITION:** For preservation of aqueous systems, N-521® PAC-24 should be added at a point in the processing where there will be sufficient time and agitation for thorough dispersion. N-521® PAC-24 can be added directly from drums by pumps or gravity feed. Shock additions to be avoided.

## STORAGE AND DISPOSAL

**DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL.**

**1. PESTICIDE STORAGE:** Container should be stored in a cool, dry, well-ventilated area. Do not store near heat or open flame. Exercise due caution to prevent damage to or leakage from the container. Keep container closed when not in use. Do not reuse container.

**2. 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.

**3. 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.

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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