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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JAN 21 2010

Ms. Colleen Snyder
VERICHEM
3499 Grand Avenue
Pittsburgh, PA 15225

Subject: Antimicrobial N20
EPA Registration No.: 67869-22
Notification Date: November 25, 2009
EPA Receipt Date: December 22, 2009

Dear Ms. Snyder,

This letter acknowledges receipt of your notification submitted under the provision of FIFRA section 3(c)9 and PR Notice 98-10.

Proposed Notification

Response to Agency letter dated July 13, 2009

General Comments

Based on a review of the submitted materials, your notification to correct Container Disposal Statement per Agency letter dated July 13, 2009 is acceptable and a part of the records on file.

Should you have any questions or comments concerning this letter, please contact Stacy Grigsby at (703) 308-6440 or Jacqueline Campbell-McFarlane at 703-308-6416.

Sincerely,

Jacqueline Campbell-McFarlane
Acting Product Manager (PM-34)
Regulatory Management Branch 2
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							



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

November 25, 2009

Ms. Tracy Lantz
Product Manager #34
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 13, 2009. Notification PR Notice 98-10 (II)(G) Labeling Notification; Storage and Disposal Statements for an Antimicrobial Product. Antimicrobial N20 (EPA Reg. # 67869-22)

Dear Ms. Lantz:

Enclosed you will find documentation to respond to your deficiency letter dated July 13, 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, Antimicrobial N20 (EPA Reg. #67869-22). There have been no additional changes made to this label. Specifically enclosed for you consideration is:

- One (1) copy of EPA letter dated July 13, 2009
- One (1) copy of the proposed product label

My best,

Colleen M Snyder
Manager of Regulatory Affairs
enclosures

ANTIMICROBIAL N-20

Controls bacteria, fungi, and yeasts in Industrial Process and Water Systems including: paper mills, industrial cooling water systems; controls slime-forming in air washer systems.

Active Ingredient:

2,2-Dibromo-3-nitropropionamide 20.0%
Inert Ingredients 80.0%
TOTAL 100.0%

DANGER

• KEEP OUT OF REACH OF CHILDREN

EPA REG NO. 67869-22
EPA EST No. 67869-PA-01

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Corrosive. Causes irreversible eye damage or skin burns. Do not get in eyes, on skin, or on clothing. May cause loss of vision. Fatal if absorbed through skin. Harmful if swallowed or inhaled. Avoid breathing vapor. Wear goggles of face shield (safety glasses). Wear protective clothing (long-sleeve shirt and long pants, socks plus shoes and chemical resistant gloves such as waterproof gloves). Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

FIRST AID

IF IN EYES: 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: 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 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. 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. Do not contaminate water by cleaning of equipment or disposal of waste. Apply this pesticide only as specified on this label.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.
NOTE: ADD ANTIMICROBIAL N-20 SEPARATELY TO THE SYSTEM. DO NOT MIX IT WITH OTHER ADDITIVES, IN ORDER TO AVOID DECOMPOSITION OF ANTIMICROBIAL N-20 DUE TO THE HIGH PH OF MANY ADDITIVE FORMULANTS.

INDUSTRIAL PROCESS AND WATER SYSTEMS FOR CONTROL OF BACTERIA:

Add 0.00095-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water in system, depending on severity of contamination.

Intermittent or Slug Method

Initial Dose: When system is noticeably fouled, add 0.0048-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water in the system every 4 days, or as needed to maintain control. **Subsequent Dose:** When microbial control is evident add 0.0024-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water in the system every 4 days, or as needed to maintain control. Badly fouled Systems must be cleaned before treatment is begun.

Continuous Feed Method

Initial Dose: When the system is noticeably fouled, add 0.0048-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water to the system. **Subsequent Dose:** Maintain this level by pumping a continuous feed of 0.00095-0.0048 gallon Antimicrobial N-20 per 1,000 gallon of water to the system per day. Badly fouled Systems must be cleaned before treatment is begun.

FOR CONTROL OF FUNGI AND ALGAE

Add 0.0029-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water in system, depending on severity of contamination.

Intermittent or Slug Method

Initial Dose: When system is noticeably fouled, add 0.0048-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water in the system every 4 days, or as needed to maintain control. **Subsequent Dose:** When microbial control is evident add 0.0024-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water in the system every 4 days, or as needed to maintain control. Badly fouled Systems must be cleaned before treatment is begun.

Continuous Feed Method

Initial Dose: When the system is noticeably fouled, add 0.0048-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water to the system. **Subsequent Dose:** Maintain this level by pumping a continuous feed of 0.0029-0.0095 gallon Antimicrobial N-20 per 1,000 gallon of water to the system per day. Badly fouled Systems must be cleaned before treatment is begun.

ENHANCED OIL RECOVERY SYSTEMS

For controlling slime-forming bacteria, sulfide producing bacteria, yeasts, and fungi in oil field water, polymer or micellar floods, water disposal systems, or other oil field water systems, add 1-80 ppm Antimicrobial N-20 (0.1-6.4 gallon Antimicrobial N-20 per 2400 barrels of water) depending on the severity of contamination. Additions should be made with a metering pump either continuously or intermittently.

Continuous Feed Method

When the system is noticeably fouled, add 10-80 ppm Antimicrobial N-20 (0.8-6.4 gallon Antimicrobial N-20 per 2400 barrels of water) continuously until the desired degree of control is achieved. Subsequently, treat with 1-15 ppm Antimicrobial N-20 (0.1-1.2 gallon Antimicrobial N-20 per 2400 barrels of water) continuously or as needed to maintain control.

Intermittent or Slug Method

When the system is noticeably fouled, or to maintain control of the system, add 10-80 ppm Antimicrobial N-20 (0.8-6.4 gallon Antimicrobial N-20 per 2400 barrels of water) intermittently for 4-8 hours per day, and from 1-4 times per week, or as needed depending the severity of contamination. Addition of Antimicrobial N-20 may be made at the free knockouts, before or after the injection pumps and injection well headers.

NOTE: For control of bacteria, yeast, and fungi in aqueous solutions biopolymer used in flooding operations, add 15-80 ppm Antimicrobial N-20 (1.2-6.4 gallon Antimicrobial N-20 per 2400 barrels of water). Additions of

Antimicrobial N-20 should be made with a metering pump immediately after preparation of the aqueous biopolymer solution to prevent loss of viscosity.

INDUSTRIAL AIR-WASHER SYSTEMS

Add 0.0015-0.095 gallon Antimicrobial N-20 per 1,000 gallon of water in the system, depending upon the severity of the contamination of control slime-forming bacteria and fungi in industrial air-washer systems.

Intermittent or Slug Method

NOTE: For use only in industrial air washer systems that maintain effective mixing components.

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS

Add Antimicrobial N-20 to the basin (or any other point of uniform mixing). Additions should be made with a metering pump; it may be continuous or intermittent, depending on the severity of the contamination when performance with this product is attained by continuous or intermittent treatment. If "shock" treatment is used, the blowdown should be discontinued for 24-48 hours.

PAPER MILLS

For the control of bacterial, fungal, and yeast growths in pulp, paper and paperboard mills, add Antimicrobial N-20 at the rate of 0.15-0.50 lb/ton of pulp or paper (dry basis). Addition may be continuous or intermittent, depending upon the type of system and the severity of contamination. It should be made with a metering pump at a location that will insure uniform distribution of Antimicrobial N-20 in the mass of fiber and water, such as the beaters, Jordan inlet or discharge, broke chests, furnish chests, save-alls, and white-water tanks. Heavily fouled systems should be boiled out, then treated with 0.15-0.35 lb Antimicrobial N-20 per ton of paper (dry basis), as necessary for control. Moderately fouled systems should be treated continuously with 0.35-0.50 Antimicrobial N-20 per ton of paper (dry basis) until the slime accumulation is controlled. Addition rates can then be reduced to 0.15-0.35 lb Antimicrobial N-20 per ton of paper on a continuous or intermittent basis, as needed for control. Dislodged slime may cause breaks in the paper, and a clean up of the paper machine be advisable. Slightly fouled systems should be treated continuously with 0.15-0.35 lb Antimicrobial N-20 per ton of paper (dry basis) until the slime is controlled, then added on an intermittent basis to maintain control.

PAPER:

Use Antimicrobial N-20 as a preservative for the control of bacteria and fungi in paper and paper additives. Antimicrobial N-20 may be fed directly to the additive at the following recommended dosages.

Dose Ranges:

Paper Auxiliaries/Additives 125-2000 ppm

Paper Slurries 125-2000 ppm

REVERSE OSMOSIS SYSTEM

Antimicrobial N-20 may be used to control bacteria and reduce biofouling in industrial membrane systems (reverse osmosis, ultrafiltration, micro filtration). Acceptable applications include reverse osmosis for the production of boiler makeup water, rinsing of electric components, and industrial wastewater treatment. Antimicrobial N-20 may be either slug fed or continuously fed to the feed streams of membrane systems. For slug feed, add between 50 and 70 ppm Antimicrobial N-20 for 30 minutes to 3 hours. Frequency of addition should be every 5 days or as needed. When fed continuously, feed rate should be between 10 and 100 ppm Antimicrobial N-20. **NOTE:** For industrial systems in which Antimicrobial N-20 residuals cannot be tolerated, Antimicrobial N-20 must be slug fed. During and for 30 minutes to 1 hour following chemical addition, permeate and concentrate streams must be diverted to waste.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: To maintain product quality, store at temperatures below 60° C. Keep container tightly closed when not in use.

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.

CONTAINER DISPOSAL

Nonrefillable container: Do not reuse or refill this container.

Triple rinse as follows: Empty remaining contents into application equipment or mix tank. Tip container on its side and roll back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip back and forth several times. Turn container over onto its other end and tip it back and forth several times. Empty rinsate into application equipment or mix tank or store rinsate into the application equipment or mix tank or store 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.

IN CASE OF A TRANSPORTATION EMERGENCY CALL CHEMTREC 1-800-424-9300 NOTICE DO NOT SHIP OR STORE WITH FOOD, FEEDS, DRUGS OR CLOTHING.

NOTICE: Seller warrants that the product conforms to its chemical description as contained on this label and is reasonably fit for the purposes stated on this label when used in accordance with directions under normal conditions of use. THE WARRANTIES MADE IN THIS

PARAGRAPH ARE SELLER'S SOLE WARRANTIES WITH RESPECT TO THE PRODUCT AND ARE MADE EXPRESSLY IN LIEU OF AND EXCLUDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FOR FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIVES AND WARRANTIES.

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.

LOT

NO.:

NET WEIGHT: _____ LBS / GALS.

NOTIFICATION
Date Reviewed: 12/11/10
Reviewed By: J. [Signature]



VERICHEM

Sold by:

VERICHEM INC.
3499 Grand Avenue
Pittsburgh, PA 15225
412-331-7299

Final Approved 78-11/09

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