

67869-22

8/19/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

AUG 19 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Colleen M. Snyder  
Manager of Regulatory Affairs  
3499 Grand Avenue  
Pittsburgh, PA 15225

Subject: Product Name: Antimicrobial 20  
EPA Registration No.: 67869-22  
Notification Date: July 22, 2010  
EPA Receipt Date: July 23, 2010

Dear Colleen M. 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**

- Alternate brand name, DBNPA 20
- Deletion of Reverse Osmosis System and Paper reservation.

**General Comments**

Based on a review of the submitted materials, your notification for the alternate brand name, DBNPA 20 and the deletion of Reverse Osmosis System and Paper reservation is acceptable and apart of the records on file.

Should you have any questions or comments concerning this letter, please contact (Juan F. Negrón) at (703-308-8116).

Sincerely,

*Jacqueline McFarlane*  
Jacqueline McFarlane  
Product Manager (34)

<b>CONCURRENCES</b>							
SYMBOL							
SURNAME							
DATE							

2014

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> <b>Other-NOTIF</b>	OPP Identifier Number
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**Application for Pesticide – Section 1**

1. Company/Product Number <b>67869-22</b>	2. EPA Product Manager	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>DBNPA 20</b>	PM# <b>34</b>	
5. Name And Address Of Applicant (Include ZIP Code) <b>Verichem, Inc 3499 Grand Avenue Pittsburgh, PA 15225</b>	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>67869-22</u> Product Name <u>Antimicrobial N-20</u>	
<input type="checkbox"/> Check if this is a new address		

**Section II**

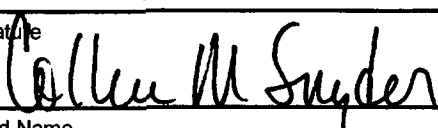
<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain Below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)  
**Notification of Alternate Brand Name per PR Notice 98-10.**  
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willingly make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section III**

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container 55 gal plastic drums, 275 gal disposable totes	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	

**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name: Colleen M. Snyder	Title: Manager of Regulatory Affairs	Telephone No. (Include Area Code) 412-331-7299
<b>Certification</b>		6. Date Application Received
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		
2. Signature 	3. Title: Manager of Regulatory Affairs	
4. Typed Name Colleen M. Snyder	5. Date July 22, 2010	



# VERICHEM

3499 GRAND AVENUE      PITTSBURGH PA 15225      412-331-7299

July 22, 2010

Ms. Jacqueline McFarland-Campbell (PM #34)  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington VA 22202

RE: **Notification of Alternate Brand Name as per PR Notice 98-10**  
EPA # 67869-22, 20% solution of 2,2-Dibromo-3-nitrilopropionamide (DBNPA);  
(PC # 101801); (CAS # 10222-01-2).

Dear Jaqueline:

As per PR Notice 98-10 "Notifications, Non-Notifications and Minor Formulations Amendments", Verichem is requesting an alternate brand name to our existing EPA registered product, **Antimicrobial 20**, a 20% solution of 2,2-Dibromo-3-nitrilopropionamide (DBNPA) (EPA Reg. # 67869-22). The Alternate Brand Name will be **DBNPA 20**. The label will be specific to the Industrial Water Processes. Other than the name change and the deletion of Reverse Osmosis System and Paper reservation, there have been no additional changes to the existing EPA approved product label.

Enclosed you will find:

- EPA Form 8570-1 Application for Registration
- One copy of the Antimicrobial N-20 label
- One copy of the DBNPA 20 label

Should you have any questions please feel free to contact me directly.

Regards,

Colleen M Snyder  
Manager of Regulatory Affairs  
enclosures

30/14

# 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%
<b>TOTAL .....</b>	<b>100.0%</b>

## 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 0.0029-0.095 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 0.048-0.095 gallon Antimicrobial N-20 per 1,000 gallon of water to the system. **Subsequent Dose:** Maintain this level by pumping a continuous feed of 0.029-0.095 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 mist eliminating 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 intermittent, depending on the severity of the contamination when treatment is begun, and the retention time of the system. Optimum 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.

QUALIFICATION  
Date Reviewed: 8/19/00  
Reviewed By: J. J. [Signature]

PROHIB disposal. PESTICI temperal PESTICI Improper violation accordin Environn at the ne CONTAI Nonrefill Triple ri equipme ensuring containe over ont rinsate ii applicati Repeat reconditi landfill.

IN CASE 1-800-42 FEEDS,

NOTICE: contained used in WARRAN PARAGR/ PRODUC IMPLIED PARTICU REPRES NOTICE variance ii beyond th

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