67869-30 10/14/2009 1 of 3

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

OCT 14 2009

EPA 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: N2000 Antimicrobial
EPA Registration No. 67869-30
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

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. N2000 Antimicrobial (EPA Reg. # 67869-30)

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, N2000 Antimicrobial (EPA Reg. #67869-30). 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

Colleen M Snyder
Manager of Regulatory Affairs
enclosures

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses), clothing and chemical resistant gloves. May be fatal if inhaled. Do not breathe vapor or spray mist. Wear a mask or pesticide respirator joint approved by the Mine Safety and Health Administration and the National Institute of Occupational Safety and Health. Harmful if swallowed or absorbed through the skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing 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 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 person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor before going for treatment. You may also contact 412-331-7299 for emergency medical treatment information. For transportation emergencies, call Chemtrec at 1-800-424-9300.

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 equipment. Apply this pesticide only as specified on this label.

STORAGE AND DISPOSAL: PESTICIDE STORAGE: Do not contaminate water, food or feed by storage or disposal. Do not use or store near heat or open flame.

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 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.

N-2000 ANTIMICROBIAL

FOR THE CONTROL OF ALGAE, BACTERIA, FUNGI, AND MOLLUSKS IN A WIDE RANGE OF INDUSTRIAL PROCESS WATERS AND MATERIAL PRESERVATIONS

Active Ingredient:	
Dodecylguanidine hydrochloride	35.0%
Inert Ingredients	65.0%
TOTAL.....	100.0%

DANGER

• **KEEP OUT OF REACH OF CHILDREN**

EPA Reg. No. 67869-30
EPA Est. No. 68387-MEX-01
EPA Est. No. 67869-PA-01

LOT NO. _____

NET WEIGHT _____ **LBS / GALS.**

SOLD BY:

VERICHEM

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

Final Approved 45-9/09

DIRECTIONS FOR USE

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

N2000 Antimicrobial is approved by the FDA (21 CFR 176.170 and 176.300) for use in the manufacturer of paper and paperboard that contacts food and for slimicides. Other than the two uses for pulp and paper mill systems, and food packaging, do not use for any material preservation applications involving direct or indirect food or drinking water containers.

INDUSTRIAL PROCESSES AND WATER SYSTEMS

AIR WASHING SYSTEMS: For use only in Industrial Air Washer Systems that maintain effective mist eliminating components. Badly fouled systems must be cleaned before treatment is begun.

SLUG OR INTERMITTENT METHOD: Initial dose: When system is noticeably fouled apply 6.6 to 13.2 oz./1000 gal (50 to 100 ppm). Repeat until control is achieved. **Subsequent dose:** When control is evident, apply 3.3 to 6.6 oz/1000 gal. (25-50 ppm) every three days or as needed.

CONTINUOUS METHOD: Initial dose: When system is noticeably fouled, apply 6.6 oz/1000 gal (25-50 ppm) per day. **Subsequent dose:** Maintain initial rate by continuously feeding 3.3 to 6.6 oz/1000 gal. (25-50 ppm) per day.

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS

For use only in Auxiliary and Standby Commercial and Industrial Systems that maintain effective mist eliminating components, Brewery Pasteurizer Water and Industrial Recirculating Water Cooling Towers. Badly fouled systems must be cleaned before treatment is begun.

SLUG OR INTERMITTENT METHOD: Initial dose: When system is noticeably fouled apply 6.6 to 13.2 oz./1000 gal (50 to 100 ppm). Repeat until control is achieved. **Subsequent dose:** When control is evident, apply 3.3 to 6.6 oz/1000 gal. (25-50 ppm) every three days or as needed.

CONTINUOUS METHOD: Initial dose: When system is noticeably fouled, apply 6.6 oz/1000 gal (25-50 ppm) per day. **Subsequent dose:** Maintain initial rate by continuously feeding 3.3 to 6.6 oz/1000 gal. (25-50 ppm) per day.

OIL FIELD WATER SYSTEMS: Badly fouled systems should be cleaned prior to treatment. Addition may be made at the free water knockouts before or after the injection pumps and injection well headers.

SLUG OR INTERMITTENT METHOD: Initial dose: When system is noticeably fouled apply 6.6 to 13.2 oz./1000 gal (50 to 100 ppm). Repeat until control is achieved for 2 to 8 hours per day once per week or daily as needed. **Subsequent dose:** When control is evident, apply 3.3 to 6.6 oz/1000 gal. (25-50 ppm) every three days or as needed.

CONTINUOUS METHOD: Initial dose: When system is noticeably fouled, apply 6.6 oz/1000 gal (25-50 ppm) per day. **Subsequent dose:** Maintain initial rate by continuously feeding 3.3 to 6.6 oz/1000 gal. (25-50 ppm) per day.

OIL RECOVERY DRILLING FLUIDS: Add directly to the packer fluid or drilling mud. The dosage rate will depend upon the severity of the contamination.

SLUG OR INTERMITTENT METHOD: Initial dose: when system is noticeably fouled apply 6.6 to 13.2 oz/1000 gal. (50 to 100 ppm) intermittently for 2 to 8 hours per week or daily as needed. Repeat until control is achieved.: **Subsequent dose:** When control is established, apply 3.3 to 6.6 oz/1000 gal. (25 to 50 ppm) every three days or as needed to maintain control.

SEWAGE DISPOSAL LAGOONS: This product reduces the growth of algae on the surface of sewage disposal lagoons which, if unchecked, can cause the lagoon to become totally anaerobic and emit odors. Dilute N2000 Antimicrobial with water to accommodate the delivery characteristics of the pump and spray rig, and apply evenly to the surface of the lagoon. Dosage should be 1.0 to 1.5 ounces (by weight) of N2000 Antimicrobial per 100 square feet of surface, depending on the population density of the algal blooms. The interval between treatments will be determined by the reappearance of floating algal blooms and subsequent treatment should be made as spot treatments at the same dosage as the initial treatment. A small outboard motorboat equipped with a tank-pump-spray boom assembly can be used to traverse the lagoon between flagment on opposite shores in order to lay down an even spray.

PULP AND PAPER MILL SYSTEMS

This product is intended for controlling microorganisms in the pulp and paper process water itself. This process additive product is effective in controlling microorganisms such as bacteria, fungi, and yeasts, which cause deterioration of finished paper and paperboard products or articles molded from paper pulp. It may be added to the pulp stock in the beater or applied to the formed sheet by size press or rollercoater, or as a uniform spray. If the product is used as a beater additive, the degree of retention of the active ingredient will depend upon the nature of the other additives in the system. Add N2000 Antimicrobial as a slug dose for the control of bacteria and fungal slime in the production of paper. Add N2000 Antimicrobial to the Beater or Hydropulper to ensure uniform mixing. When the paper or paperboard product is to be subjected to excessive leaching as by rainfall or contact with ground water, a concentration of up to 0.8% of active ingredient by weight of the paper or paperboard may be required for effective microbial control.

Pulp and Paper Mill Systems ... 0.007 to 0.1 lb per ton (dry basis)

MATERIAL PRESERVATION

Other than food packaging, do not use for any material preservation applications involving direct or iindirec food or drinking water contact.

ADHESIVE SYSTEMS (NON-FOOD CONTACT PAPER): N2000 Antimicrobial is used in the preservation of non-food contact paper related aqueous systems. The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 1000 Gallons of Material:
Automobile adhesives tapes: ..... 2.1 - 8.3 lbs (250-1000 ppm)
Glues: ..... 2.1 - 8.3 lbs (250-1000 ppm)
Nonfood packaging adhesives: ..... 2.1 - 8.3 lbs (250-1000 ppm)
Wallpaper: ..... 2.1 - 8.3 lbs (250-1000 ppm)
Wood glue: ..... 2.1 - 8.3 lbs (250-1000 ppm)

PAINTS, COATINGS, AND STAINS: N2000 Antimicrobial is used in the preservation of non-food contact paper related aqueous systems. The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 1000 Gallons of Material:
Paints and coatings (between manufacture and formation): ..... 2.1 - 8.3 lbs (250-1000 ppm)
Coatings systems (paints and coatings as finished products): ..... 2.1 - 8.3 lbs (250-1000 ppm)
Titanium dioxide and calcium carbonates (precursors to paint and coating products): ..... 2.1 - 8.3 lbs (250-1000 ppm)

PIGMENTS, DYES, AND FILER SUSPENSION: N2000 Antimicrobial is used in the preservation of non-food contact paper related aqueous systems. The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 1000 Gallons of Material:
Pigments slurries (paint dyes for non-clothing such as industrial fibers): ..... 2.1 - 8.3 lbs (250-1000 ppm)
Calcium Carbonate ..... 2.1 - 8.3 lbs (250-1000 ppm)
Clay ..... 2.1 - 8.3 lbs (250-1000 ppm)
Titanium dioxide ..... 2.1 - 8.3 lbs (250-1000 ppm)

POLYMER DISPERSION AND EMULSIONS: N2000 Antimicrobial is used in the preservation of non-food contact paper related aqueous systems. The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 1000 Gallons of Material:
Contact polymer systems: ..... 2.1 - 8.3 lbs (250-1000 ppm)
Latex emulsions systems: ..... 2.1 - 8.3 lbs (250-1000 ppm)

PULP AND PAPER MILL PROCESSING CHEMICALS, ADHESIVES, AND COATINGS: Add N2000 Antimicrobial directly to the material to be preserved prior to manufacturing into the finished product. The dosage rate will depend upon the material to be preserved and the storage time. The usual addition should be 1.3 to 4.0 oz./1000 gal. (10-30 ppm). Under extreme conditions of spoilage, the dosage rate should be increased to 1.7 to 10.6 oz/1000 gal (12.5 to 80 ppm). The dosage rates are based on a maximum storage time of 2 weeks.

For storage time greater than 2 weeks the maximum concentration should be increased to 6.6 to 13.2 oz/1000 gal (50 to 100 ppm). Do not use for adhesives or coatings that involve direct or indirect food, or human drinking water contact application.

Dosage Rate Per 1000 Gallons of Material:
Adhesives: ..... 1.3 to 4.0 oz. (10-30 ppm)
Alum: ..... 1.3 to 4.0 oz. (10-30 ppm)
Broke: ..... 1.3 to 4.0 oz. (10-30 ppm)
Defoamers: ..... 1.3 to 4.0 oz. (10-30 ppm)
Emulsions: ..... 1.3 to 4.0 oz. (10-30 ppm)

Paper products: ..... 1.3 to 4.0 oz. (10-30 ppm)
Papermill coatings: ..... 1.3 to 4.0 oz. (10-30 ppm)
Pigment slurries: ..... 1.3 to 4.0 oz. (10-30 ppm)
Polymers: ..... 1.3 to 4.0 oz. (10-30 ppm)
Pulp: ..... 1.3 to 4.0 oz. (10-30 ppm)

DISPOSABLE DIAPERS: N 2000 Antimicrobial is a bacteriostatic intended to be used in the manufacturing of the absorbent material in Disposable Diapers. This product will be added to the beginning of the manufacturing process at a range of 0.075% to 0.20% by weight of the treated material.

FOOD PACKAGING: For paper and paperboard intended for use in contact with food, the rate of application of this product must be adjusted so that the amount of active ingredient (dodecylguanidine hydrochloride) retained does not exceed 0.4 percent by weight of the paper or paperboard. This product is effective in controlling microorganisms, such as bacteria, fungi, and yeasts, which cause deterioration of paper and paperboard products or articles molded from paper pulp. It may be added to the pulp stock in the beater or applied to the formed sheet by size press or roll coater, or as a uniform spray. If the product is used as a beater additive, the degree of retention of the active ingredient will depend upon the nature of the other additives in the system. Technical service is available from the manufacturer of this product to assist customers in making the proper and most efficient use of the product.

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 LEU 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 quantities, which extend beyond the description on this label.

8, UN 3265, III
CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S.
(CONTAINS: DODECYLGUANIDINE HYDROCHLORIDE)

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