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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: N948 WB
EPA Registration No. 67869-31
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. N948 WB (EPA Reg. # 67869-31)

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, N948 WB (EPA Reg. #67869-31). 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 HUMAN AND DOMESTIC ANIMALS

DANGER! CORROSIVE Causes skin burns and irreversible eye damage. May be fatal if swallowed. Harmful if inhaled. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin, or on clothing. Avoid breathing vapors. Wear protective eyewear such as goggles or a face shield, and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

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.

FIRST AID:

Have 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 immediately 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.

N-948 WB

A WATER-BASED FORMULATION TO INHIBIT AND CONTROL THE GROWTH OF MICROORGANISMS IN VARIOUS INDUSTRIAL PROCESS AND WATER SYSTEMS AND MATERIAL PRESERVATION.

Active Ingredient:	
Methylene bis thiocyanate	10.0%
Inert Ingredients	90.0%
TOTAL	100.0%

DANGER

- **KEEP OUT OF REACH OF CHILDREN**

LOT NO. _____

EPA Reg. No. 67869-31

EPA Est. No. 67869-PA-01

NET WEIGHT _____ LBS / GALS.

Made in U.S.A.

VERICHEM

VERICHEM INC.
3499 Grand Avenue
Pittsburgh, PA 15225

Final Approved 37-9/09

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. All ppms are expressed as active ingredient in water.

N-948 WB is effective against a wide variety of bacteria, fungi and yeast in various Industrial Process and Water Systems and Material Preservation. The following guidance is given as a range for each pattern. Actual field-testing is recommended to achieve optimum effectiveness. N-948 WB is approved by the FDA (21 CFR 176.300) for use in the manufacturer of paper and paper-board that contacts food. Other than the paper related uses on this label, do not use for any other listed applications, which may involve indirect food or drinking water contact.

INDUSTRIAL PROCESS AND WATER SYSTEMS

AIR WASHER SYSTEMS: For use only in industrial air washing systems that maintain effective mist eliminating components. Add 0.12 to 0.90 pounds of N-948 WB to 1000 gallons of water (1.4 to 10.8 ppm) in the air washer sump, or chill water sump to ensure uniform mixing, for the control of bacteria, fungi, and algae. A repeat treatment may be needed depending on the severity of contamination.

RECIRCULATING COOLING TOWERS: For the control of bacteria, algae and fungi, feed N-948 WB to the tower basin or some other point to ensure uniform mixing. Add 0.3 to 1.86 pounds per 1000 gallons of water (3.6 to 22 ppm) weekly or as needed for maintenance. For noticeably fouled systems use an initial dose of 0.40 to 0.90 pounds of N-948 WB (4.8 to 11 ppm) per 1000 gallons of water. Repeat if necessary to achieve control.

PAPER AUXILIARIES/ADDITIVES: Use N-948 WB as a preservative for the control of bacteria and fungi in paper and paper additives and as slug dose for the control of bacterial and fungal slime in the production of paper. N-948 WB may be fed directly to the additive at the following dose ranges or to the Beater or Hydropulper to ensure uniform mixing.

DOSE RANGES PER 1000 GALLONS OF WATER:	
Paper Auxiliaries/Additives	6.9 to 69 pounds (82-827) ppm
Paper Slurries	6.9 to 69 pounds (82-827) ppm

DOSE RANGES PER TON (DRY BASIS) OF PULP OR PAPER PRODUCED:	
Paper Mills	0.14 to 0.36 pounds (7 to 18 ppm)

BREWERY PASTEURIZER WATER: For Control of Bacteria, Yeasts and Fungi: Dosages of N-948 WB will depend upon the condition of the system. Systems, which are heavily contaminated, should be cleaned first. N-948 WB should be added to the first section of the pasteurizer. The initial dose should be (0.19 to 0.37 pounds of N-948 WB per 1000 gallons of water (2.3 to 4.4 ppm) once or twice weekly, or as needed to obtain control of slime forming organisms. To maintain control, add 0.092 to 0.84 pounds per 1000 gallons of water of N-948 WB (1.1 to 10 ppm) once, twice or three times weekly, or as needed. Addition of N-948 WB may be continuously or intermittently, as required to control growth.

PETROLEUM PRODUCTION AND DISTRIBUTION

DRILLING, COMPLETION AND WORKOVER FLUIDS: Add N-948 WB to a drilling fluid system at a point of uniform mixing such as the circulating mud tank. **Initial Treatment:** Add 0.2 to 4.0 gallons of N-948 WB per 100 barrels of fluid (4.1 to 83 ppm) to a freshly prepared fluid depending on the severity of contamination. **Maintenance Dose:** Maintain a dose of 4.1 to 83 ppm by adding 0.2 to 4.0 gallons of N-948 WB per 100 barrels of additional fluid, or as needed, depending on the severity of contamination.

HYDROTESTING: Water used to hydrotest pipelines or vessels should contain 0.1 to 40 gallons of N-948 WB per 1000 gallons water (11 to 4400 ppm), depending on water quality and length of time the equipment will remain idle.

MATERIAL PRESERVATION

ADHESIVE, GLUES AND TACKIFIER PRESERVATION: Add N-948 WB as an in-container preservative for the control of bacteria and fungi in water soluble and water dispersed adhesives. N-948 WB can be directly mixed homogeneous into the dry glues before they are concentrated.

DOSE RANGES PER 1000 GALLONS OF MATERIAL:	
Albumin Containing Glues	6.9 to 69 pounds (82-827) ppm
Bone Glues	6.9 to 69 pounds (82-827) ppm
Casein-Containing Adhesives	6.9 to 69 pounds (82-827) ppm
Cellulose-Based Adhesives	6.9 to 69 pounds (82-827) ppm
Dextrin-Based Adhesives	6.9 to 69 pounds (82-827) ppm
Fish Glues	6.9 to 69 pounds (82-827) ppm
Gelatin-Based Glues	6.9 to 69 pounds (82-827) ppm
Leather Glues	6.9 to 69 pounds (82-827) ppm
Plant Glues	6.9 to 69 pounds (82-827) ppm
Polymer Dispersion-Based Adhesives	6.9 to 69 pounds (82-827) ppm
Skin Glues	6.9 to 69 pounds (82-827) ppm
Starch-Based Glues (Liquid)	6.9 to 69 pounds (82-827) ppm
Starch-Based Glues (Solid)	6.9 to 69 pounds (82-827) ppm

CONSTRUCTION PRODUCTS AND HOUSEHOLD PRODUCTS: Add N-948 WB for the control of bacteria and fungi in water soluble and water dispersed construction products. N-948 WB can be fed either directly to the finished construction or household product or to one of the raw materials used in the formulation of the construction and/or household product.

DOSE RANGES PER 1000 GALLONS OF MATERIAL:	
Biopolymers (e.g. Xanthan)	6.9 to 69 pounds (82-827) ppm
Caulking Materials	6.9 to 69 pounds (82-827) ppm
Mastics	6.9 to 69 pounds (82-827) ppm
Ceramic Glazes	6.9 to 69 pounds (82-827) ppm
Chemical Cleaning Solutions	6.9 to 69 pounds (82-827) ppm
Cleaning Solutions	6.9 to 69 pounds (82-827) ppm
Concrete and Masonry Additives	6.9 to 69 pounds (82-827) ppm
Concrete	6.9 to 69 pounds (82-827) ppm
Fire Extinguishing Medium	6.9 to 69 pounds (82-827) ppm
Photographic Gelatins	6.9 to 69 pounds (82-827) ppm
Plasters	6.9 to 69 pounds (82-827) ppm
Polishes	6.9 to 69 pounds (82-827) ppm
Rubber Systems	6.9 to 69 pounds (82-827) ppm
Tints	6.9 to 69 pounds (82-827) ppm
Wax Emulsions	6.9 to 69 pounds (82-827) ppm

FUEL PRESERVATION: Add N-948 WB for the control of bacteria and fungi in the following liquid hydrocarbon fuels and oils: crude oils, aviation fuels, kerosene, heating oils, diesel fuels, residual fuel oils, coal slurries, liquefied petroleum gases and petrochemical feedstock. Add N-948 WB directly into a fuel tank, storage or a flowing stream of fuel in a manner to ensure uniform distribution of the preservative in the fuel system. Slug dose or continuous feed methods are recommended. When the system is noticeably fouled, add 32 - 64 fluid ounces of N-948 WB per 10,000 gallons of fluid in the system. This will provide 25 to 50 ppm of N-948 WB and 2.5 - 5.0 ppm active ingredient. Repeat until control is achieved. Grossly contaminated systems should be physically cleaned to remove debris. When the system is noticeably fouled add 64 - 128 fluid ounces of N-948 WB per 10 000 gallons of fluid to maintain the system. This will provide 50 to 100 ppm of N-948 WB and 5.0 - 10 ppm active ingredient. Repeat every 4-6 weeks or when microbial contamination is detected. FOR USE IN AVIATION FUEL, THE FEDERAL AVIATION ADMINISTRATION MUST BE CONSULTED AS TO THE ACCEPTABILITY OF THE PRODUCT FOR USE IN SPECIFIC ENGINES AND/OR AIRCRAFT.

LEATHER TANNING: N-948 WB is used as a preservative for the control of bacteria and fungi.

Add N-948 WB directly into pickle solutions. An effective protection against mold attack may be obtained by adding N-948 WB into the basifying solution. Finished vegetable - tanned leathers and chrome leathers may also be protected against mold attack by a treatment on both sides of the material with a 0.025% - 0.25% solution of N-948 WB.

Dose Ranges:	
Chrome leather (calculated on pelt weight)	0.025 - 0.25%
Leather pasting adhesives	0.025 - 0.25%
Leather pigment finishes	0.025 - 0.25%
Pickle solutions and pickled hides	0.025 - 0.25%

METALWORKING FLUIDS, LUBRICANTS AND MINERAL OIL BASED PRODUCTS: Use N-948 WB as a preservative for the control of bacteria and fungi in Metalworking, Lubricants and Mineral Oil Based Products. Add N-948 WB directly to the cutting oil as recommended.

DOSE RANGES PER 1000 GALLONS OF MATERIAL:	
Metalworking fluids-Mineral Oil Based	
Boring and Cutting Oils	6.9 to 37 pounds (82-444) ppm
Coolng fluids (concentrates)	6.9 to 37 pounds (82-444) ppm
(ready for use)	6.9 to 37 pounds (82-444) ppm
Fuel oils	6.9 to 37 pounds (82-444) ppm
Hydraulic oils	6.9 to 37 pounds (82-444) ppm
Metalworking fluids-Non-Mineral Oil Based	
Cooling fluids	6.9 to 37 pounds (82-444) ppm
Cutting Oils	6.9 to 37 pounds (82-444) ppm

PAINTS, COATINGS AND STAINS: N-948 WB is generally incorporated directly into pigments and fillers, but it can also be first dissolved in a suitable solvent, such as water, or added directly to the pre-heated binder systems. For best results, N-948 WB should be homogeneously incorporated into the stain or paint. Discoloration may occur, and should be evaluated.

DOSE RANGES PER 1000 GALLONS OF MATERIAL:	
Alkyd Resin-Based Systems	6.9 to 69 pounds (82-827) ppm
Casein-Systems	6.9 to 69 pounds (82-827) ppm
Latex-Based Systems	6.9 to 69 pounds (82-827) ppm
Oil-Containing Systems	6.9 to 69 pounds (82-827) ppm
Synthetic Resin Dispersions	6.9 to 69 pounds (82-827) ppm

PIGMENTS, DYES AND FILLER SUSPENSIONS: N-948 WB is metered directly into the material to be preserved during the cooling step after the temperature falls below 50°C and homogeneously distributed by stirring.

DOSE RANGES PER 1000 GALLONS OF MATERIAL:	
Calcium Carbonate Slurries	6.9 to 69 pounds (82-827) ppm
Carbon Black Pigment Slurries	6.9 to 69 pounds (82-827) ppm
Clay Slurries	6.9 to 69 pounds (82-827) ppm
Iron Oxide Pigment Slurries	6.9 to 69 pounds (82-827) ppm
Kaolin Slurries	6.9 to 69 pounds (82-827) ppm
Organic Dyes and Pigment Slurries	6.9 to 69 pounds (82-827) ppm
Other Filler Suspensions	6.9 to 69 pounds (82-827) ppm
Starch Slurries	6.9 to 69 pounds (82-827) ppm
Dispersing agent tank:	6.9 to 69 pounds (82-827) ppm

POLYMER DISPERSIONS AND EMULSIONS: N-948 WB is added immediately after the preparation of the polymer dispersion or emulsion during the cooling process. Mix N-948 WB previously with dispersing agents for processes where the temperature does not exceed 50°C. Losses of active ingredient caused by elevated temperatures should be avoided.

DOSE RANGES PER 1000 GALLONS OF MATERIAL: (Polymer Dispersions and Emulsions):	
Acrylic-Systems	6.9 to 69 pounds (82-827) ppm
Other Polymer Dispersions	6.9 to 69 pounds (82-827) ppm
Polyester-Based Systems	6.9 to 69 pounds (82-827) ppm
Polyurethane-Based Systems	6.9 to 69 pounds (82-827) ppm
Polyvinyl acetate (PVA) Systems	6.9 to 69 pounds (82-827) ppm
Styrene Butadiene Systems	6.9 to 69 pounds (82-827) ppm
Vinyl Acrylic-Based Systems	6.9 to 69 pounds (82-827) ppm

TEXTILES: Add N-948 WB directly to the textile normally by dipping or spraying. The preservative is affixed to the fiber with a suitable acid like acetic acid. For the preservation of auxiliaries, N-948 WB is diluted in solvents as mentioned above or is homogeneously distributed with the aid of alkaline solutions or emulsion concentrates. Print thickeners are preserved by adding N-948 WB directly to the emulsion or homogeneously metered directly into the dried product. Milling may be necessary in order to obtain consistent particulate sizes.

DOSE RANGES PER 1000 GALLONS OF MATERIAL:	
Auxiliaries	
(Sizing Agents, Finishing Agents, Spinning Preparations, Wetting Agents)	6.9 to 69 pounds (82-827) ppm
Awnings and Tarpaulins	6.9 to 69 pounds (82-827) ppm
Carpets	6.9 to 69 pounds (82-827) ppm
Cotton Production	6.9 to 69 pounds (82-827) ppm
Felts	6.9 to 69 pounds (82-827) ppm
Fire Hoses	6.9 to 69 pounds (82-827) ppm
Geotextiles	6.9 to 69 pounds (82-827) ppm
Jute, Sisal	6.9 to 69 pounds (82-827) ppm
Shower Curtains	6.9 to 69 pounds (82-827) ppm
Upholstery	6.9 to 69 pounds (82-827) ppm
Wool Production	6.9 to 69 pounds (82-827) ppm

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal. Store in a cool dry place in tightly closed original containers. 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 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.

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