

67869-34

4/2/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

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

Subject: Notification in Accordance with PR Notice 98-10  
**DBDCB AD**  
EPA Registration Number: 67869-34  
Application Date: February 26, 2009  
Receipt Date: March 6, 2009

APR - 2 2009

Dear Ms. Snyder:

This will acknowledge receipt of your notification, submitted under the provisions of PR Notice 98-10, FIFRA section 3 (c) 9.

**Proposed Notification:**

Alternate brand name: Triacide™ AD

The notification is acceptable and will be made apart of the record for this file.

Should you have any questions concerning this letter, please contact me by telephone at (703) 308-6415 or email address at: [lantz.tracy@epa.gov](mailto:lantz.tracy@epa.gov), or Lisa McKelvin by telephone at (703) 308-7496 or email address at: [mckelvin.Lisa@epa.gov](mailto:mckelvin.Lisa@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Tracy Lantz  
(Acting) Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

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

1. Company/Product Number <p style="text-align: center;"><b>67869-34</b></p>	2. EPA Product Manager <p style="text-align: center;"><b>Marshall Swindell</b></p>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>VeriGuard® DBDCB AD / TRIACIDE™ AD</b>	PM# <p style="text-align: center;"><b>33</b></p>	
5. Name And Address Of Applicant (Include ZIP Code) <b>Verichem, Inc</b> <b>3499 Grand Avenue</b> <b>Pittsburgh, PA 15225</b>  <input type="checkbox"/> Check if this is a new address		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. _____  Product Name _____

**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.)

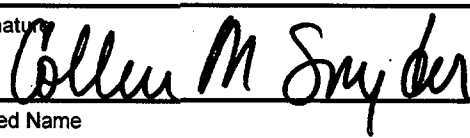
**Notification of Alternate Brand Name Approval per PR Notice 98-10 section III(A). See Cover Letter for explanation.**

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 willfully make any false statement 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  <i>* Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "Yes"      No. per Unit Packaging wgt.      Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "Yes"      No. per Unit Packaging wgt.      Container	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) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(S) Retail Container 5 gal and 55 gal HDPE containers, 275 gal disposable totes and 40,000 gal tank trucks.	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

**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
Certification 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.		6. Date Application Received
2: Signature 	3. Title: Manager of Regulatory Affairs	
4. Typed Name Colleen M. Snyder	5. Date February 26, 2009	



**VERICHEM**

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

February 26, 2009

Mr. Marshall Swindell  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington VA 22202-4501

RE: Notification to Add an Alternate Brand Name as per PR Notice 98-10

Dear Marshall:

By way of Notification, Verichem proposes to add an alternate brand name for VeriGuard® DBDCB AD (EPA Reg. No. 67869-34). The alternate brand name will be Triacide™ AD which is a newly applied for trade name with the US Patent and Trademark Office. We certify that this addition of a brand name permits clear identification, is not misleading and is in accordance with PR Notice 98-10. Included for your review is:

- One (1) copy of EPA from 8570-1 Application for Pesticide
- One (1) copy of the proposed product label
- One (1) copy of the primary brand name product label
- One (1) self addressed stamped envelope requesting written acceptance of this request.

Please call me directly should you have any questions at 412-331-7299 or e-mail me at [csnyder@verichem.com](mailto:csnyder@verichem.com).

Most sincere regards,

Colleen M. Snyder  
Manager of Regulatory Affairs

NOTIFICATION  
 Date Reviewed: *5/2/09*  
 Reviewed By: *AMC*

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMAN AND DOMESTIC ANIMALS**

**DANGER. CORROSIVE.** Causes irreversible eye damage. May be fatal if inhaled. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Wear goggles, safety glasses or face shield when handling. Avoid contact with skin. Do not breathe vapor or spray mist dust. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Remove contaminated clothing and wash clothing before reuse.

**USER SAFETY RECOMMENDATIONS**

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Wash the outside of gloves before reusing. As soon as possible, wash thoroughly. Users should remove personal protective equipment immediately after handling this product.

**ENVIRONMENTAL 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.

**FIRST AID**

**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 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 INHALED:** Move person to fresh air. If not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth. Call a poison control center or doctor for treatment advice.

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Get medical attention. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. 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, or going for treatment.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

**TELEPHONE NUMBERS:** For emergency information on (product), call 1-412-331-7299 or 1-412-521-6393, Monday through Friday, 9 am to 5 PM. After 5 PM call your poison control center. For transportation emergencies call Chemtrec at 1-800-424-9300.

**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.

**TRIACIDE™ AD**

**TO INHIBIT THE GROWTH OF MICROORGANISMS IN AQUEOUS SYSTEMS INCLUDING AQUEOUS EMULSIONS AND OILS APPLIED TO SYNTHETIC FIBERS AS PROCESSING AIDS**

**Active Ingredient:**

1,2-Dibromo-2,4-Dicyanobutane .....	25.0%
<b>Inert Ingredients: .....</b>	<b>75.0%</b>
<b>TOTAL</b>	<b>100.0%</b>

**KEEP OUT OF REACH OF CHILDREN**

**DANGER PELIGRO**

EPA Reg. No. 67869-34  
 EPA Est. No. 67869-PA-01

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

\_\_\_\_\_ LB. NET WT. \_\_\_\_\_ kg

MADE IN THE U.S.A.

SOLD BY:



**VERICHEM INC.**  
 3499 Grand Avenue  
 Pittsburgh, PA 15225

Proof 03/09

**DIRECTIONS FOR USE**

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

TRIACIDE™ AD is typically effective when applied at the concentrations shown. All concentrations are based on total formulation weight.

**ADHESIVE, GLUES AND TACKIFIER PRESERVATION:**

Incorporate with agitation into the makeup water blend. However, where the adhesive is heated, TRIACIDE™ AD should be added during the cool down cycle.

Polyvinyl acetate, styrene-butadiene, methyl cellulose & acrylic .....	0.10 - 0.30%
Polyvinyl alcohol & Hydroxyethyl cellulose .....	0.20 - 0.30%
Epoxy, polyester .....	0.04 - 0.30%
Dextrine Based Adhesive .....	0.30 - 0.40%
Casein Based Adhesive .....	0.40 - 0.60%

**DISPERSED PIGMENTS:**

Add using moderate agitation immediately following the cool down of the dispersed pigment and prior to entering the storage tank facilities.

Dispersed Pigments .....	0.04 - 0.10%
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**FIBER PROCESSING FLUIDS:**

Fiber Processing Fluids .....	0.20 - 1.20%
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**JOINT CEMENTS:**

Incorporate with agitation into the make up water blend.

Joint Cements .....	0.20 - 0.40%
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**LATEX EMULSIONS:**

Add using moderate agitation immediately following the cool down of the emulsion and prior to entering the storage tank facilities.

Latex Emulsions .....	0.04 - 0.20%
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**METALWORKING FLUIDS:**

Add to the final diluted cutting fluid, either prior to its addition to the system, or after the system has been filled. TRIACIDE™ AD should be thoroughly mixed into the system to assure efficacy. If TRIACIDE™ AD is added to the concentrate, testing should be done to assure compatibility.

Metalworking Fluids .....	0.10 - 0.40%
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**PAINTS, COATINGS AND STAINS:**

Incorporate into the make up water during the grind.

Aqueous Paints .....	0.10 - 0.30%
(Including heating & air conditioning systems)	

**WAXES, POLISHES AND INKS:**

Incorporate into the makeup water blend with moderate agitation.

Waxes & Polishes .....	0.01 - 0.10%
Inks .....	0.01 - 0.075%

**STORAGE AND DISPOSAL**

**PROHIBITIONS:**

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

**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 label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**PESTICIDE STORAGE:**

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:**

**Plastic Containers:** Do not reuse container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**GENERAL:** Consult Federal, State, or Local disposal authorities for approved alternative procedures.

**NOTICE:** Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of uses and/or handling of the material when such use and/or handling is contrary to label instruction.

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