

67869-34

01/21/2010

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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: VeriGuard DBBCB
EPA Registration No.: 67869-34
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 24, 2009

General Comments

Based on a review of the submitted materials, your notification to correct Container Disposal Statement per Agency letter dated July 24, 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							



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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 24, 2009. Notification PR Notice 98-10 (II)(G) Labeling Notification; Storage and Disposal Statements for an Antimicrobial Product. VeriGuard DBDCB AD (EPA Reg. # 67869-34)

Dear Ms. Lantz:

Enclosed you will find documentation to respond to your deficiency letter dated July 24, 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, VeriGuard DBDCB AD (EPA Reg. #67869-34). There have been no additional changes made to this label. Specifically enclosed for you consideration is:

One (1) copy of EPA letter dated July 24, 2009
One (1) copy of the proposed product label

My best,



Colleen M Snyder
Manager of Regulatory Affairs
enclosures

VeriGuard[®] DBDCB 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%
Inert Ingredients:	75.0%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO

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

**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.

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 the product, call 1-412-331-7299, 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.

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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. VeriGuard™ DBDCB 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, VeriGuard™ DBDCB AD should be added during the cool down cycle.

Recommended Dosages:

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

DISPERSED PIGMENTS:

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

Recommended Dosages:

Dispersed Pigments	0.04 - 0.10%
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FIBER PROCESSING FLUIDS:

Recommended Dosages:

Fiber Processing Fluids	0.20 - 1.20%
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JOINT CEMENTS:

Incorporate with agitation into the make up water blend.

Recommended Dosages:

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.

Recommended Dosages:

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. VeriGuard™ DBDCB AD should be thoroughly mixed into the system to assure efficacy. If VeriGuard™ DBDCB AD is added to the concentrate, testing should be done to assure compatibility.

Recommended Dosages:

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

Incorporate into the make up water during the grinding.

Recommended Dosages:

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

WAXES, POLISHES AND INKS:

Incorporate into the make up water blend with moderate agitation.

Recommended Dosages:

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

STORAGE AND DISPOSAL

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 the 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: 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.

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.

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.

LOT NO.: _____

NET WEIGHT: _____ LBS / GALS.

Made in U.S.A.



VERICHEM

NOTIFICATION

Date Reviewed: 11/21/10
Reviewed By: S. H. G. H.

**SOLD BY:
VERICHEM INC.
3499 Grand Avenue
Pittsburgh, PA 15225
413-331-7299**

Final Approved 77-11/09

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