

67869-36

10/14/2009

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OCT 14 2009

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



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: N5033 Antimicrobial
EPA Registration No. 67869-36
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

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510P)



2 of 3
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. N5033 Antimicrobial (EPA Reg. # 67869-36)

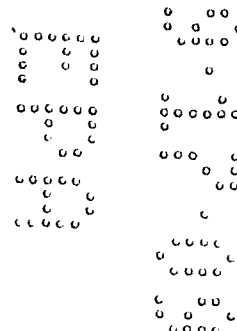
Dear Marshall:

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, N5033 Antimicrobial (EPA Reg. #67869-36). 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
Manager of Regulatory Affairs
enclosures



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage and skin burns. Harmful or fatal if swallowed, inhaled or absorbed through skin. Do not get in eyes, on skin or on clothing. Avoid breathing vapors and mists. Not to be used as an aerosol. May cause allergic skin reactions in certain individuals. May cause asthmatic signs and symptoms in some hyper-reactive individuals. Wear eye goggles or face shields, rubber gloves and protective clothing when handling this product. Wash thoroughly with soap and water after handling and before eating, drinking and using tobacco. Remove contaminated clothing and wash before re-use.

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 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 for treatment advice.

If swallowed: Call 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 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 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.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not apply in marine and/or estuarine oil fields. Do not contaminate water when disposing of equipment washwaters.

Instructions in Case of Spills or Leaks: Wear goggles or face shield, rubber gloves, and protective clothing. Absorb spills and leaks with inert material such as sand, clay or vermiculite. Shovel into a sealable container and dispose of in an authorized EPA disposal facility.

In Case of Fire: Use water, carbon dioxide, dry chemical (eg. Sodium bicarbonate) extinguishing medias. Fire fighters should be equipped with self-contained breathing apparatus and turnout gear.

In Case of Chemical Emergency: Call CHEMTREC day or night for assistance and information concerning spilled material, fire, exposure and other chemical accidents. 800-424-9300.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: N-5033 ANTIMICROBIAL solutions are corrosive to many commonly used materials of construction such as steel, galvanized iron, aluminum, tin and zinc. These solutions can be stored and handled in baked phenolic lined steel, stainless steel or reinforced epoxy equipment. This product freezes at approximately -20° C (-4° F). Therefore, unless the storage tank is inside or underground, heating and insulation may be required. If heating is needed, exposure to temperatures should be avoided. For short storage (1 month) temperatures up to 100° F can be used; however, the preferred maximum storage temperature is approximately 80° F. Keep away from fire and open flames. A stainless steel centrifugal pump is suggested for transfer service.

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.

Nonrefillable Containers. 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 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.

GENERAL: Consult Federal, State and local authorities for approved alternative procedures RCRA Hazardous Waste Code D002.

N-5033 ANTIMICROBIAL

A microbiocide for controlling slime-forming bacteria, sulfate-reducing bacteria, fungi, yeast and algae in paper mills and paper mill process water systems, water based coatings for paper and paper board, air washers, recirculating cool water systems, heat transfer systems, and oil well drilling and oil field processing applications.

DO NOT USE IN ANY MARINE AND/OR ESTUARINE OIL FIELD APPLICATIONS.

Active Ingredient:

Glutaraldehyde	50%
Inert Ingredients	50%
	100%

**KEEP OUT OF REACH OF CHILDREN
DANGER!**

EPA Reg. No. 67869-36

EPA Est. No. 67869-PA-01

LOT NO. _____

NET WEIGHT _____ LBS / GALS.

SOLD AND DISTRIBUTED BY:



VERICHEM INC.

3499 Grand Avenue
Pittsburgh, PA 15225
(412) 331-7299

Proof Approval 68-09/08

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

AIR WASHERS AND RECIRCULATING COOLING WATER SYSTEMS: This product may be used only in industrial air washer systems, which have mist-eliminating compounds. N-5033 ANTIMICROBIAL should be added at the application rates described below, to a water treatment system at a convenient point of uniform mixing such as the basin area. Addition may be made intermittently (SLUG DOSE) or continuously. Badly fouled systems can be shock treated with N-5033 ANTIMICROBIAL. Under these conditions, blowdown should be discounted for up to 24 hours.

INTERMITTENT (SLUG DOSE) METHOD: Initial Dose: When the system is noticeably fouled, add 11.5-23.0 fluid ounces (100-200 ppm) of N-5033 ANTIMICROBIAL per 1,000 gallons of water in the system. Repeat until control is achieved. Subsequent Dose: When microbial control is evident, add 4.6-11.5 fluid ounces (40-100 ppm) of N-5033 ANTIMICROBIAL per 1,000 gallons of water in the system per day, or as needed to maintain control. Badly-fouled systems must be cleaned before treatment begins.

CONTINUOUS FEED SYSTEM: Initial Dose: When the system is noticeably fouled, apply 11.5-23.0 fluid ounces (100-200 ppm) of N-5033 ANTIMICROBIAL per 1,000 gallons of water in the system. Subsequent Dose: Maintain these treatments by starting a continuous feed of 4.6-11.5 fluid ounces (40-100 ppm) of N-5033 ANTIMICROBIAL per 1,000 gallons of water in the system per day. Badly-fouled systems must be cleaned before treatment begins.

HEAT TRANSFER SYSTEMS: (Evaporative Condensers, Hydrostatic Sterilizers and Retorts, and Pasteurizers and Warmers) Initial Dose: When the system is noticeably fouled, add 11.5-23.0 fluid ounces (100-200 ppm) of N-5033 ANTIMICROBIAL per 1,000 gallons of water in the system. Subsequent Dose: Maintain these treatments by starting a continuous feed of 4.6-11.5 fluid ounces (40-100 ppm) of N-5033 ANTIMICROBIAL per 1,000 gallons of water in the system per day. Badly fouled systems must be cleaned before treatment begins. It should be added to the system as a point of uniform mixing such as the basin area, pump area, or other reservoir or collecting areas from which the treated water will be circulated uniformly throughout the system.

OIL WELL DRILLING AND OIL FIELD PROCESS APPLICATIONS

OIL WELL WATER FLOODS: Calculate the total volume of water flood system and, using this volume, calculate the number of gallons of N-5033 ANTIMICROBIAL needed. Use 100-200 ppm N-5033 ANTIMICROBIAL until control is achieved. For example, 0.09-0.18 gal N-5033 ANTIMICROBIAL per 1000 gal floodwater will provide this dilution. Add N-5033 ANTIMICROBIAL as a slug or intermittently. 50 ppm of N-5033 ANTIMICROBIAL added each week is recommended to maintain bacterial control. This may be accomplished by adding 0.05 gal of N-5033 ANTIMICROBIAL to each 1,000 gals of total volume.

DRILLING MUDS: Calculate the total volume of the drilling mud system and using this volume, calculate the number of gallons of N-5033 ANTIMICROBIAL needed. Parts per million (ppm) levels are for total product. Use up to 1000 ppm N-5033 ANTIMICROBIAL, depending on the severity of the bacterial contamination. For example, 3.8 gal N-5033 ANTIMICROBIAL per 100 barrels (4200 gallons) of fluid will provide this dilution. While the system is circulating, add the N-5033 ANTIMICROBIAL in a thin stream. Add additional N-5033 ANTIMICROBIAL to maintain the proper concentration as the total volume of the system increases with the well depth.

WORKOVER FLUIDS: Calculate the total volume of the workover fluid system and, using this volume, calculate the number of gallons of N-5033 ANTIMICROBIAL needed. Use up to 1000 ppm of N-5033 ANTIMICROBIAL, depending on the severity of the bacterial contamination. For example, 3.8 gal N-5033 ANTIMICROBIAL per 100 barrels (4200 gallons) of fluid will provide this dilution. Add N-5033 ANTIMICROBIAL into the system. Circulate the workover fluid system until the fluid returns clear. Shut the system down and idle for several hours. Remove the workover fluid. This well should be ready for productive use.

PAPER MILLS AND PAPER MILL PROCESS WATER SYSTEMS:

N-5033 ANTIMICROBIAL should be added to papermaking systems at a point of uniform mixing, such as the beaters, broke chest pump, save-all tank, or white water tank.

Initial Treatment: When the water is noticeably contaminated, add 0.5-3.0 lbs per ton of pulp or paper (dry basis) as a slug dose. Repeat until control is achieved. Heavily-fouled systems should be cleaned out prior to initial treatment.

Subsequent Dose: When microbial control is evident add 0.3-2.0 lbs per ton to pulp or paper (dry basis) as a slug dose as necessary to maintain control.

PIGMENTS AND FILLER SLURRIES FOR FOOD-CONTACT PAPER AND PAPERBOARD: To

inhibit the growth of spoilage microorganisms during manufacture, storage and distribution of pigments and filler slurries such as kaolin, calcium carbonate and titanium dioxide. Add sufficient quantities of N-5033 ANTIMICROBIAL to produce a concentration of 100-600 ppm by weight of the formulation slurry (1-6 lbs of product per 10,000 lbs of slurry).

CONDITIONS OF SALE

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is possible to eliminate all risk inherently associated with use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of the Seller. All such risks shall be assumed by the Buyer. The manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to above.

UN 3265

CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S.
(GLUTARALDEHYDE)



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