

67869-37

10/14/2009

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

OCT 14 2009



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: Vericide Bronopol
EPA Registration No. 67869-37
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)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or inhaled. Harmful if absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash hands thoroughly with soap and water after handling and before eating, drinking and using tobacco or using the toilet.

PERSONAL PROTECTIVE EQUIPMENT (PPE): Applicators and other handlers must wear: coveralls over long sleeved shirt and long pants, socks and chemical resistant footwear, goggles or face shield and chemical resistant gloves such as or made of any water proofed material. If dusts are generated, wear an approved dust respirator.

USER SAFETY REQUIREMENTS: Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE away from other laundry.

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. Users should remove PPE immediately after handling this product. Wash the outside of the gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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 by cleaning of equipment or disposal of waste.

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.

PHYSICAL AND CHEMICAL HAZARDS: Avoid contact with metal equipment such as scoops, and sieves.

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

PESTICIDE STORAGE: Keep away from heat.

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 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 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.

FIBER DRUMS WITH LINERS: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

VERICIDE BRONOPOL

Vericide Bronopol is a concentrated free-flowing crystalline solid microbicide for use in controlling bacteria and algae found in industrial application, and as a preservative to inhibit bacterial spoilage during manufacture, distribution, use and storage of industrial, consumer, household and institutional products. Not for the control of algae in the State of California.

Active Ingredients:

2-bromo-2-nitropropane-1,3-diol 99.0%

Inert Ingredients: 1.0%
100.0%

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

EPA Reg. 67869-37

EPA Est. No. 67869-PA-01

LOT NO. _____

NET WEIGHT _____ LBS / GALS.

SOLD AND DISTRIBUTED BY:

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

Final Approval 67-09/09

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

To control the growth of slime forming, spoilage, odor causing and corrosion inducing bacteria and algae in industrial applications. Vericide Bronopol can be dosed directly, or by preparing a stock solution immediately prior to application, either by open pouring (not cooling water treatment) or by metered pump. For process application treatments Vericide Bronopol may be slug dosed initially when the system is noticeable fouled and reduced to a maintenance dose once microbial control is evident. For some applications treatment may be by slug dose only, or by maintenance dose only. More frequent and higher dosing should be used where contamination is heavy. The recommended dosing regimes (slug/maintenance dose) and the dose rates are as indicated in the individual use area instructions. For use of cold water soluble bags (PVA film) 1 x 0.5 kilo bag/1300 gallons is equivalent to 100 ppm. For preservation during the manufacture, distribution, storage and use of industrial, consumer, household and institutional products Vericide Bronopol is best added at any liquid phase as late as possible during the manufacturing process. It may be added by pre-dissolving in any water to be incorporated into the formulation. Add after any heating stage, or when the product has cooled below 40° C. Ensure good mixing and even distribution throughout the product. Do not apply this product in a way that will contact workers or other persons.

INDUSTRIAL COOLING WATER: For use in cooling towers, evaporate condensers, open and closed loop cooling and stored (non-potable) water, industrial and/or commercial air washers, air conditioning and humidifying systems. Vericide Bronopol will reduce the biofouling of pipework, heat exchangers, condenser tubes and minimize microbial corrosion. Apply Vericide Bronopol once weekly to once monthly to the sump or tank where turbulence will ensure quick dissolution. Do not apply by open pouring of liquid to cooling towers and evaporator condensers. Shock dose Vericide Bronopol at 50 to 100 ppm (0.42 to 0.84 lb/1000 gallons). Subsequent dosing can be reduced to 10 ppm. For small packages a 40g sachet in 200 gallons (or 4g in 20 gallons) will achieve 50 ppm.

PAPER MILL PROCESS WATER: Apply at a convenient point early in the process system (machine chest, constant head box or backwater loop system). Dose Vericide Bronopol once to three times daily at 1 to 25 ppm in the process water. This equates to 0.02 to 0.5 lb per ton of finished paper or paperboard.

PAPER MILLS - BULK PAPER: Add Vericide Bronopol directly into the hydropulper, machine chest or stock chest. Apply once weekly to once daily at 50 to 200 ppm (0.1 - 0.4 lb per ton).

OIL PROCESS WATERS: For use in oil and gas well injection and formation waters Vericide Bronopol Solution should be injected at any convenient point at 25-100 ppm (0.009 - 0.036 lb/barrel) from once per week to once per month depending on the severity of contamination.

OIL AND GAS FLUIDS: For preservative use in both terrestrial and offshore drilling muds and packer fluid, to control contamination and degradation of a wide range of gels and fluids including fracturing, enhanced oil recovery, injection, waterflood, workover and completion fluids. Add Vericide Bronopol at 50 to 100 ppm (0.18 - 0.36 lb barrel). For well squeezed fluids add Vericide Bronopol at 25-200 ppm.

OIL AND GAS PIPELINE AND TANK MAINTENANCE: For use in water bottoms in crude and refined hydrocarbon storage tanks, piping and transportation systems. Inject Vericide Bronopol directly into the water bottoms or pipeline, or add to the hydrocarbon phase. Treat once daily for pipeline maintenance to once every one to two months for both storage and transportation systems. Vericide Bronopol should be applied to achieve 25-200 ppm in the aqueous phase. Add higher concentrations to the hydrocarbon phase, which will result in longer term protection by the gradual diffusion into the water phase. Dose will depend on the volume or crude or oil and the expected water fraction.

METALWORKING FLUIDS: For use in soluble oils, semi-synthetic and synthetic fluids. Add directly to the sump (with agitation) and allow to circulate for about one hour before shutdown. Vericide Bronopol may be incorporated in metalworking fluid concentrate by the manufacturer who should ensure that any

incompatibility will not affect efficacy. In diluted fluids 100 to 1000 ppm of Vericide Bronopol (2.0 gallons of Vericide Bronopol in 1000 gallons will give a dose level of 1000 ppm).

STARCH, PIGMENT AND MINERAL SLURRIES: For preservation, apply Vericide Bronopol to water based suspensions at 100 to 500 ppm based on the final formulation volume (0.84 to 4.2 lb / 1000 gallons). Not for use in pigments in the State of California.

ABSORBENT CLAYS: For preservation, impregnate absorbent clays by spraying or pouring solutions of 25-200 ppm of Vericide Bronopol (0.04 - 0.32 oz. av. per 100 pounds of clay).

PAINTS AND OTHER EMULSION SYSTEMS: For the preservation of acrylic, styrene acrylic, polyvinyl and other latex emulsion, latex emulsion based paints, photographic emulsion, silicone and other antifoam emulsion systems. Add Vericide Bronopol at 100 - 500 ppm based on the final formulation volume (0.84 to 4.2 lb/1000 gallons).

ADHESIVES: For preservation, add 0.1 to 0.5 lb of Vericide Bronopol per 100 lb total formulation weight (1000 to 5000 ppm).

CHEMICAL TOILET DEODORANTS: Incorporate Vericide Bronopol at levels of 1 -28% in deodorant concentrates. To effectively control odor in a portable toilet, use 100-500 ppm (0.84 - 4.2 lb/1000 gallons).

WATER BASED PRINTING INKS AND FOUNT SOLUTIONS: During the use of fountain solutions, shock dose Vericide Bronopol at 50 to 100 ppm (0.42 to 0.84 lb / 1000 gallons) depending on the contamination. Apply once weekly in the fountain reservoir as a normal routine, or more frequently if required. For in-can preservation dose Vericide Bronopol at 100 to 500 ppm based on the final formulation volume (0.84 to 4.2 lb / 1000 gallons).

WATER BASED AGRICULTURAL PESTICIDE CONCENTRATES: For preservation, Vericide Bronopol should be dosed at 100 to 500 ppm based on the final formulation volume (100 to 500 g/cubic meter or 0.84 to 4.2 lbs/1000 gallons).

CONSUMER, HOUSEHOLD AND INSTITUTIONAL PRODUCTS; SURFACTANTS AND RAW MATERIALS: For preservation of products such as dishwashing liquids, surface cleaners, polishes; bulk ionic, nonionic, amphoteric and cationic surfactants and raw materials supplied for the manufacture of industrial and consumer products. Vericide Bronopol should be dosed at 100 to 500 ppm based on the final formulation volume (100 to 500 g/cubic meter or 0.84 to 4.2 lbs/1000 gallons).

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.

THE MANUFACTURER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

The manufacturer offers this product, and the Buyer and User accept it, subject to the foregoing Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorized representative.

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