

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

022808

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Ms. Colleen Snyder Manager of Regulatory Affairs for, Verichem, Inc. 3499 Grand Ave. Pittsburgh, PA 15225

Subject: Vericide Bronopol Solution

EPA Registration Number 67869-38

Your Notification Dated February 4<sup>th</sup>, 2008 EPA Received Date February 6<sup>th</sup>, 2008

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to change the source of active ingredient, is acceptable.

The notification has been part of the permanent record of this file.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

Marshall Swindell

Product Manager 33

Regulatory Management Branch I Antimicrobial Division(7510C)



February 4, 2008

Mr. Marshall Swindell Product Manager 33 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: Alternate Source Notification for Vericide Bronopol Solution (67869-38)

Dear Mr. Swindell:

Vericide Bronopol Solution (EPA Reg. # 67869-38) has source approval using Myacide S15 (EPA Reg. # 333753-17) and Bioban BP 10 (EPA Reg. # 464-680). In addition to these currently approved active ingredients, we would also use The LanXESS Corporation's Bronopol active ingredient; Preventol P-100 Preservative (EPA Reg. # 39967-61). By way of this letter, Verichem hereby notifies EPA of the change of source in accordance with EPA PR Notice 98-10 sec. III (A). A Formulators Exemption is attached.

"This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR152.46 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 the 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 40CFR152.46 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."

Specifically enclosed are:

EPA Form 8570-1 EPA Form 8570-4 EPA Form 8570-27 Product label

Please feel free to contact me should you have any questions.

un M. Snyder

Regards,

Colleen Snyder

Please read instructions on reverse before c. 'eting fo	rm	Form App	<u>1. OMB No.</u> 2070⊣	3/4/ 0060. Approval expires 2-28-95				
SEPA Environmental Pro Weshington,	tection Agency	<b>V</b>	Registration Amendment Other	OPP Identifier Number				
Application for Pesticide - Section I								
1. Company/Product Number 67869-38	2. EP/ Mars	3. Proposed Classification  None Restricted						
Company/Product (Name)     Vericide Bronopol Solution	• PM# 34							
5. Name and Address of Applicant (Include ZIP Code) Verichem, Inc 3499 Grand Avenue Pittsburgh, PA 15225  Check if this is a new address	(b)(i), to: EPA	6. Expedited Reveiw. 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 -							
Resubmission in response to Agency letter dated  Notification - Explain below.  Explanation: Use additional page(s) if necessary. (Fo Notification of Source of Active Ingredient per PR Notice 98 CFR 0152.46, and no other changes have been made to the 18 U.S.C. Sec. 1001 to willfully make any false stateme 98-10 and 40 CFR 152.46, this product may be in violation FIFRA. Please see cover letter for additional explanation.	r section I and Section II.  1-10. This notification is coel abeling or the confidention to EPA. I further unders	Agency letter da "Me Too" Applic Other - Explain b  risistent with the proval statement of formstand that if this notification.	elow.  visions of PR Notice 9 ala of this product. I I cation is not consiste	understand that it is a violation of ent with the terms of PR Notice				
	Section -	HI		· · · · · · · · · · · · · · · · · · ·				
1. Material This Product Will Be Packaged In:  Child-Resistant Packaging  Yes  ✓ No  * Certification must  If "Yes" Unit Packaging wgt.	Yes ✓ No	If "Yes" No. per		2. Type of Container  Metal Plastic Glass Paper Other (Specify)				
be submitted								
3. Location of Net Contents Information 4. Siz	e(s) Retail Container 55 lb drum - 110 lb (	l r > m						
6. Manner in Which Label is Affixed to Product	Lithograph Paper glued Stenciled	Other						
	Section -	IV						
1. Contact Point (Complete items directly below for idea	tification of individual to	be contacted, if ned	essary, to process	this application.)				
Name Colleen M. Snyder	Title  Manager of Re	Title Manager of Regulatory Affairs		Telephone No. (Include Area Code)				
I certify that the statements I have made on this for acknowledge that any knowlingly false or misles both under applicable law.				6. Date Application Recaived				
2. Signature Collum. Snyder	3. Title  Manager of Regu	ulatory Affairs						
4. Typed Name  Colleen M. Snyder	5. Date Fe	bruary 04, 20	08					

### PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes eye and skin damage. Do not get in eyes, on skin or on clothing. Avoid breathing spray mists. Wear long sleeve shirt and long pants, socks plus shoes. Wear goggles or face shield and chemical resistant rubber gloves when handling. Do not apply this product in a way that will contact workers or other persons. Harmful or fatal if swallowed. May cause allergic skin reactions in certain individuals. Wash thoroughly with soap and water after handling. Discard clothing or other absorbent materials that have been heavily contaminated with this product's concentrate. Do not reuse them. Remove lightly contaminated clothing and wash separately from other laundry using detergent and hot water hefore re-use.

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 vomitting 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.

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

PESTICIDE STORAGE: Store in a cool dry place in tightly closed original containers. Prolonged storage under freezing conditions may cause the active ingredients to crystallize.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Imprope. disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If a these wastes cannot be disposed of by use according to label instructions, contact, your State Pesticide or Environment Control Agency, or the Hazardous Wasto Representative at the nearest EPA regional office for guidance.

CONTAINER DISPOSAL: Empty residue into application equipment. Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture. Dispose of container in a sanitary landfill, or by incineration, if allowed by State and local authorities. If burned, stay out of smoke.

### VERICIDE BRONOPOL SOLUTION

Vericide Bronopol Solution is a liquid microbiocide for use in controlling the growth of bacteria and algae in industrial applications. Not for the control of algae in the State of California.

### **Active Ingredients:**

2-bromo-2-nitrop	ropane-1,3-diol	10.	0%
Inert Ingredients:		90.	0%
	-		

100.0%

# DANGER!

EPA Reg. No. 67869-38 EPA Est. No. 67869-PA-01

LOT NO			
		,	

LB. NET WT. \_\_\_\_\_kg

SOLD AND DISTRIBUTED BY:



### **VERICHEM INC.**

3499 Grand Avenue Pittsburgh, PA 15225

Proof Approval 66-03/03

**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 Solution can be dosed directly either by open pouring (not cooling water treatment) or by metered pump. For product preservation Vericide Bronopol Solution is best added after any heating stage or when the product has cooled below 40° C.

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS AND EVAPORATIVE CONDENSERS: Vericide Bronopol Solution may be dosed directly into the sump or basin or added by a suitable chemical pump. Where metering pumps are used, these must be set to deliver the required dose within 1 hour. The dosing point should be located close to the outlet from the basin to insure rapid dispersal around the system. Do not apply by open pouring of the liquid. Shock dose Vericide Bronopol Solution once or twice weekly as a normal routine or more frequently where contamination is heavy. In heavily fouled systems, the tower should be drained and cleaned before treating. Vericide Bronopol Solution should be shocked dosed at 250 to 1000 ppm 2 pt to 8 pt per 1000 gallons) depending on the condition of the tower, the quality of raw water input and the amount of bleed off.

INDUSTRIAL PROCESS WATER: For use in closed circuit machine cooling (injection moulding etc.) and stored (non-potable) water. To reduce the biofouling of pipework, heat exchangers, condensers tubes and minimize microbially produced corrosion. Shock dosing in the sump/tank of the process water system is preferred. In open systems shock dose once weekly to once monthly depending on the degree of contamination. Closed circuit systems require less frequent dosing. Dose initially at 500 ppm Vericide Bronopol Solution (4 pt/1000 gallons), the when successful, lower to a minimum of 100 ppm. For intermittent treatment during routine maintenance use Vericide Bronopol Solution at 1000 ppm and a contact time of at least one hour.

OIL AND GAS FLUIDS: For use in both terrestrial and offshore drilling muds and packer fluids, for the control of contamination and degradation of a wide range of gels and fluids including fracturing, enhanced oil recovery, injection, well squeezing, drilling, workover and completion fluids. Add Vericide Bronopol Solution at 500 to 1000 ppm (4 to 8 pt/1000 gallons or 0.18 to 0.36 pt per barrel). For well squeezed fluids add Vericide Bronopol Solution at 250 to 2000 ppm (2 to 16 pt / 1000 gallons).

OIL PROCESS WATERS: For use in oil and gas well injection and formation waters. Vericide Bronopol Soluţion should be injected as a stug dose at any convenient point at 250 to 1000 ppm (2 pt to 8 pt /1000 gallons). A slug dose should be applied from once per week to once per month depending on the severity of contamination.

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 Solution 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 Solution should be applied to achieve 250-2000 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. 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 and circulate for about one hour before shutdown. Vericide Bronopol Solution may be incorporated in metalworking fluid concentrate by the manufacturer who should ensure that any incompatibility will not affect efficacy. In diluted fluids 2500 to 10,000 ppm of Vericide Bronopol Solution is sufficient to control microbial growth (5 gallons of Vericide Bronopol Solution in 1000 gallons will give a dose level of 5000 ppm). For maintenance, add 1000-4000 ppm of Vericide Bronopol Solution.

PAPER MILL PROCESS WATER SYS'
early in the process system (machine chest

early in the process system (machine chest loop system). Dose Verlcide Bronopol Solito to 250 ppm in the process water depending quality of raw paper and type and degree of 100 to 2500 ml (0.2 to 5 pt) per tonne of finit

PAPER MILLS -BULK PULP: Add Venic the hydropulper, machine chest or stock Solution once weekly to once daily at 500 t tonne of stock or 4 to 16 pt / 1000 gallons) d of contamination.

INDUSTRIAL AND/OR COMMERC CONDITIONERS AND HUMIDIFYING bacterial and algal growth and to remove dosing is preferred and should be carried ou basis once per week or month. Heavily fo weekly treatment. The initial dose of Vericid ml/cubic meter or 3.8 pints/1000 gallons ingredient). Subsequent dosing can be reduc during regular maintenance and cleaning ingredient is also recommended with a contribution.

ADHESIVES: Add 1 to 5 pt of Vericide B formulation weight to any water to be incorporated absorbent CLAYS: Impregnate absor 250 to 2000 ppm of Vericide Bronopol Sol pounds of day).

STARCH, PIGMENT AND MINERAL Bronopol Solution to water based suspensis ppm based on the final formulation volume (to use in pigments in the State of California.

PAINTS AND OTHER EMULSION SYstems, styrene acrylic, polyvinyl acetate emulsion based paints, photographic emulsemulsion systems. Add Vericide Bronopol So on the final formulation volume (8 to 40 pt/16

WATER BASED PRINTING INKS AND the use of fountain solutions, shock dose Ve 1000 ppm (4 to 8 pt / 1000 gallons) depend once weekly in the fount as a normal routin For in-can preservation dose Vericide Bronop based on the final formulation volume (8 to 4

CONDITIONS OF SALE: The Directions opinion of experts based on field use and tes be reliable and should be followed careful eliminate all risk inherently associated with us or other unintended consequences may re weather conditions, presence of other mate manner inconsistent with its labeling, all of w Seller. All such risks shall be assumed by warrants that this product conforms to the d and is reasonably fit for the purposes referre THE MANUFACTURER MAKES NO OT WARRANTY OF FITNESS OR MERCHA EXPRESS OR IMPLIED WARRANTY. MANUFACTURER BE LIABLE FOR CO INDIRECT DAMAGES RESULTING FROM THIS PRODUCT.

The manufacturer offers this product, and the to the foregoing Conditions of Sale and Warra agreement in writing signed by a duly author