

67869-44

3/25/2008

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

MAR 25 2008



United States
Environmental Protection
Agency

Office of Pesticide Programs

VeriChem, Inc.
3499 Grand Avenue
Pittsburgh, PA 15225

Attention: Colleen M. Snyder

Subject: VeriGuard Plus
EPA Registration No. 67869-44
Notification Dated February 26, 2008

This will acknowledge receipt of your notification for an addition of an Indoor, Non-food Site, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification dated February 26, 2008 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 Martha Terry at (703) 308-6217.

Sincerely,

A handwritten signature in cursive script, appearing to read "Martha Terry" or "Marshall Swindell".

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



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

February 26, 2007

Mr. Marshall Swindell
Product Manager 33
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 of Addition of an Indoor, Nonfood Site per PR Notice 98-10
(Section II(C));
VeriGuard Plus (MR5005), EPA Reg. # 67869-44

Dear Mr. Swindell:

On December 12, 2007, Verichem, Inc. obtained an EPA end use product registration approval for VeriGuard Plus (EPA Reg. # 67869-44), which contains 30% Dodecylguanidine hydrochloride (DGH) and 10% Ortho phenylphenol (OPP). VeriGuard Plus is approved for a wide range of uses in industrial processes and water systems and for Material Preservation. As described on our EPA approved product label; material preservation uses include, but are not limited to, adhesives, polymer dispersion and emulsions, paints, coatings, stains, pigments and dyes in dose ranges of between 250 to 5000 ppm.

There have been recent successful trials using VeriGuard Plus using the recommended dose range of 250 to 5000 ppm, as a material preservative for caulks and sealants. Verichem has a customer that is eager to incorporate the VeriGuard Plus into their construction materials product line as a material preservative. However, these two uses (i.e., material preservative for caulk and sealants) are not specifically listed on the product label. While caulks and sealants are not specifically listed in Appendix A of 40 CFR 158, it is apparent that these uses fall under the broad definition of Appendix A (12) – Commercial and Industrial Uses; Preservative and Protectants. Therefore, it is Verichem's understanding that this situation permits these uses to be added to the label by Notification as specified under PR Notice 98-10 Sec. II part C - "Adding an Indoor, Nonfood Site for an Antimicrobial Product".

Notification of Addition of an Indoor, Nonfood Site
per PR Notice 98-10 (Section II(C)):
VeriGuard Plus (MR5005), EPA Reg. # 67869-44

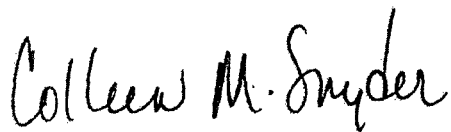
In support of this request to specifically add caulk and sealant material preservation to this product's label via Notification, this product has already been approved for material preservative use at the same concentration range proposed for use in caulks and sealants. Further, exposure potential to cured caulk and sealants is not anticipated to be greater than that to paints, pigments, stains, and other materials preserved by this product.

In accordance with PR Notice 98-10, enclosed are:

- One (1) copy EPA Form 8570-1
- One (1) copy of the current EPA Stamped Approved label (dated December 12, 2007), and
- Three (3) copies of the proposed modified product label to include caulks and sealants

Please contact me at 412-331-7299 or csnyder@verichem.com should you have any questions or require additional information.

My most sincere regards,



Colleen M. Snyder
Manager of Regulatory Affairs

Please read instructions on reverse side before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

		United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section 1					
1. Company/Product Number 67869-44		2. EPA Product Manager Swindell		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) VeriGuard Plus		PM# 33			
5. Name And Address Of Applicant (Include ZIP Code) Verichem, Inc. 3499 Grand Avenue Pittsburgh, PA 15225 <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 checked="" type="checkbox"/> Other – Explain Below.					
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Refer to cover letter for detail. Notification of Adding an Indoor, Nonfood Site for an Antimicrobial Product per PR Notice 98-10. 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 willingly 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 * Certification must be submitted	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 pail, 55 gal dr, 275 gal tote		5. Location of Label Directions <input checked="" type="checkbox"/> On Container <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, 2008			

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or on clothing. Do not breathe vapor or spray mist. Wear coveralls worn over long-sleeved shirt and long pants, socks, chemical-resistant footwear, chemical resistant gloves, goggles, face shield, or shielded safety glasses, and a respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approved number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH) approved number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any N,R,P, or HE prefilter. May be fatal if inhaled. Harmful if swallowed or absorbed through the skin. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the restroom. Remove and wash contaminated clothing before reuse.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to allow. 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 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 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 further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER: Have the product container or label with you when calling a Poison Control Center or doctor before going for treatment. You may also contact 412-331-7299 for emergency medical treatment information. For transportation emergencies call Chemtrec at 1-800-424-9300.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. 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. Do not contaminate water by cleaning of equipment or disposal of waste. Apply this pesticide only as specified on this label.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Do not use or store near heat or open flame.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If waste 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.

CONTAINER DISPOSAL:

PLASTIC CONTAINERS: 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.

VeriGuard® Plus

**FOR THE CONTROL OF ALGAE,
BACTERIA, FUNGI, AND MOLLUSKS
IN A WIDE RANGE OF COMMERCIAL
AND INDUSTRIAL PROCESSES AND
MATERIAL PRESERVATIONS.**

Active Ingredients:

Dodecylguanidine hydrochloride.....	30%
Ortho Phenyl Phenol.....	10%
Inert Ingredients:.....	60%
TOTAL.....	100%

DANGER

**KEEP OUT OF REACH OF CHILDREN
SEE SIDE PANEL FOR
PRECAUTIONARY STATEMENTS**

EPA Reg. No. 67869-44

EPA Est. No. 67869-PA-001

LOT NO. _____

_____ LB. NET WT. _____ kg

SOLD BY:



VERICHEM

VERICHEM INC.

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

Added Use Draft 02/26/08

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
VeriGuard® Plus is approved by the FDA (21 CFR 176.170 and 176.300) for use in the manufacture of paper and paperboard that contacts food and for silmids. Other than the two uses for pulp and paper mill systems, and food packaging, do not use for any material preservation applications involving direct or indirect food or drinking water contact.

INDUSTRIAL PROCESSES AND WATER SYSTEMS

AIR WASHING SYSTEMS

For use only in Industrial Air Washer Systems that maintain effective mist eliminating components. Badly fouled systems must be cleaned before treatment is begun.

SLUG OR INTERMITTENT METHOD

Initial dose: When system is noticeably fouled apply 6.6 to 13.2 oz./1000 gal (50 to 100 ppm). Repeat until control is achieved. **Subsequent dose:** When control is evident, apply 3.3 to 6.6 oz./1000 gal. (25-50 ppm) every three days or as needed.

CONTINUOUS METHOD

Initial dose: When system is noticeably fouled, apply 6.6 oz./1000 gal (25-50 ppm) per day. **Subsequent dose:** Maintain initial rate by continuously feeding 3.3 to 6.6 oz./1000 gal. (25-50 ppm) per day.

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS

For use only in Auxiliary and Standby Commercial and Industrial Systems that maintain effective mist eliminating components. Brewery Pasteurizer Water and Industrial Recirculating Water Cooling Towers. Badly fouled systems must be cleaned before treatment is begun.

SLUG OR INTERMITTENT METHOD

Initial dose: When system is noticeably fouled apply 6.6 to 13.2 oz./1000 gal (50 to 100 ppm). Repeat until control is achieved. **Subsequent dose:** When control is evident, apply 3.3 to 6.6 oz./1000 gal. (25-50 ppm) every three days or as needed.

CONTINUOUS METHOD

Initial dose: When system is noticeably fouled, apply 6.6 oz./1000 gal (25-50 ppm) per day. **Subsequent dose:** Maintain initial rate by continuously feeding 3.3 to 6.6 oz./1000 gal. (25-50 ppm) per day.

OIL FIELD WATER SYSTEMS

Badly fouled systems must be cleaned before treatment is begun. Addition may be made at the free water knockouts before or after the injection pumps and injection well headers.

SLUG OR INTERMITTENT METHOD

Initial dose: When system is noticeably fouled apply 6.6 to 13.2 oz./1000 gal (50 to 100 ppm). Repeat until control is achieved. **Subsequent dose:** When control is evident, apply 3.3 to 6.6 oz./1000 gal. (25-50 ppm) every three days or as needed.

CONTINUOUS METHOD

Initial dose: When system is noticeably fouled, apply 6.6 oz./1000 gal (25-50 ppm) per day. **Subsequent dose:** Maintain initial rate by continuously feeding 3.3 to 6.6 oz./1000 gal. (25-50 ppm) per day.

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 **VeriGuard® Plus** 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 **VeriGuard® Plus** 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. **VeriGuard® Plus** should be injected as a slug 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.

SEWAGE DISPOSAL LAGOONS

This product reduces the growth of algae on the surface of sewage disposal lagoons, which, if unchecked, can cause the lagoon to become totally anaerobic and emit odors. Dilute **VeriGuard® Plus** with water to accommodate the delivery characteristics of the pump and spray rig, and apply evenly to the surface of the lagoon. Dose should be 1.0 to 1.5 ounces (by weight) of **VeriGuard® Plus** per 100 square feet of surface, depending on the population density of the algal blooms. The interval between treatments will be determined by the reappearance of floating algal blooms and subsequent treatment should be made as spot treatments at the same dosage as the initial treatment. A small outboard motorboat equipped with a tank-pump-spray boom assembly can be used to traverse the lagoon between fragment on opposite shores in order to lay down an even spray.

MATERIAL PRESERVATION

Other than food packaging, do not use for any material preservation applications involving direct or indirect food or drinking water contact.

ADHESIVE SYSTEMS (NON-PAPER)

VeriGuard® Plus is used in the preservation of non-food contact paper related aqueous systems. The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 10,000 Pounds of Material to be Preserved:

Automobile adhesives tapes:	2.50 - 50.0 lbs (250-5000 ppm)
Glues:	2.50 - 50.0 lbs (250-5000 ppm)
Nonfood packaging adhesives:	2.50 - 50.0 lbs (250-5000 ppm)
Wallpaper:	2.50 - 50.0 lbs (250-5000 ppm)
Wood Glues:	2.50 - 50.0 lbs (250-5000 ppm)

CAULKS AND SEALANTS

VeriGuard® Plus can also be used to protect cured caulking and sealant films from mold and mildew formation, which can adversely impact the service life of such

products. **VeriGuard® Plus** can be fed at concentrations of 250 to 5000ppm (0.025% - 0.5%) based on the total weight of the formulation. The exact amount for the preservation of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by actual testing of a formulation.

LEATHER

VeriGuard® Plus may be added directly to the pickle solutions. In the case of chrome leather, an effective protection against mold attack may be obtained without additional labor by stirring **VeriGuard® Plus** directly to the basifying solution, since **VeriGuard® Plus** dissolves freely in the alkaline solution. Finished vegetable-tanned leathers and chrome leathers may also be protected against mold attack by a treatment on both sides of the material with a 0.35 - 0.69% solution of **VeriGuard® Plus**.

Dose Ranges:

Chrome leather (calculated on pelt weight)	0.90 - 2.20%
Leather pasting adhesives	0.40 - 0.90%
Leather pigment finishes	1.70 - 3.50%
Pickle solutions and pickled hides	1.30 - 2.20%

PASTES

VeriGuard® Plus is used in the preservation of non-food contact paper related aqueous systems. Laboratory testing shows **VeriGuard® Plus** to be effective in the range of 2.50 - 10.0 lbs (250 to 5000 ppm). The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 10,000 Pounds of Material to be Preserved:

Wallpaper:	2.50 - 50.0 lbs (250-5000 ppm)
Wood glue:	2.50 - 50.0 lbs (250-5000 ppm)
Nonfood packaging adhesives:	2.50 - 50.0 lbs (250-5000 ppm)

PAINTS, COATINGS, AND STAINS

VeriGuard® Plus is used in the preservation of non-food contact paper related aqueous systems. Laboratory testing shows **VeriGuard® Plus** to be effective in the range of 2.50 - 10.0 lbs (250 to 5000 ppm). The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 10,000 Pounds of Material to be Preserved:

Paints and coatings: (between manufacture and formation):	2.50 - 50.0 lbs (250-5000 ppm)
Coatings systems: (paints and coatings as finished products):	2.50 - 50.0 lbs (250-5000 ppm)
Titanium dioxide and calcium carbonates: (precursors to paint and coating products):	2.50 - 50.0 lbs (250-5000 ppm)

PIGMENTS, DYES, AND FILER SUSPENSION

VeriGuard® Plus is used in the preservation of non-food contact paper related aqueous systems. Laboratory testing shows **VeriGuard® Plus** to be effective in the range of 2.50 - 10.0 lbs (250 to 5000 ppm). The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 10,000 Pounds of Material to be Preserved:

Pigments slurries: (paint dyes for non-clothing such as industrial fibers):	2.50 - 50.0 lbs (250-5000 ppm)
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POLYMER DISPERSION AND EMULSIONS

VeriGuard® Plus is used in the preservation of non-food contact paper related aqueous systems. Laboratory testing shows **VeriGuard® Plus** to be effective in the range of 2.50 - 10.0 lbs (250 to 5000 ppm). The exact amount for the preservative of any given formulation will depend on the components, storage time, temperature, etc., and can be determined by the actual testing based on formula weight.

Dosage Rate Per 10,000 Pounds of Material to be Preserved:

Contact polymer systems:	2.50 - 50.0 lbs (250-5000 ppm)
Latex emulsions systems:	2.50 - 50.0 lbs (250-5000 ppm)

PULP AND PAPER MILL PROCESSING CHEMICALS, ADHESIVES, AND COATINGS

Add **VeriGuard® Plus** directly to the material to be preserved prior to manufacturing into the finished product, (i.e., pulp, broke, polymers, defoamers, alum, emulsions, adhesives, papermill coatings, pigment slurries, and paper products). The dosage rate will depend upon the material to be preserved and the storage time. The usual addition should be 0.10 - 0.30 lbs/10,000 lbs. (10-30 ppm). Under extreme conditions of spoilage, the dosage rate should be increased to 0.11 - 0.66 lbs/10,000 pounds (12.5 to 80 ppm). The dosage rates are based on a maximum storage time of 2 weeks. For storage time greater than 2 weeks the maximum concentration should be increased to 0.40 - 0.83 lbs/10,000 pounds (50 to 100 ppm). Do not use for adhesives or coatings that involve direct or indirect food, or human drinking water contact application.

Dosage Rate Per 10,000 Pounds of Material to be Preserved:

Adhesives:	0.10 - 0.30 lbs (10-30 ppm)
Alum:	0.10 - 0.30 lbs (10-30 ppm)
Broke:	0.10 - 0.30 lbs (10-30 ppm)
Defoamers:	0.10 - 0.30 lbs (10-30 ppm)
Emulsions:	0.10 - 0.30 lbs (10-30 ppm)
Paper products:	0.10 - 0.30 lbs (10-30 ppm)
Papermill coatings:	0.10 - 0.30 lbs (10-30 ppm)
Pigment slurries:	0.10 - 0.30 lbs (10-30 ppm)
Polymers:	0.10 - 0.30 lbs (10-30 ppm)
Pulp:	0.10 - 0.30 lbs (10-30 ppm)