

67869-44

10/14/2009

1 of 3

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: VeriGuard Plus  
EPA Registration No. 67869-44  
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)

2083



**VERICHEM**

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. VeriGuard Plus (EPA Reg. # 67869-44)

Dear Marshall:

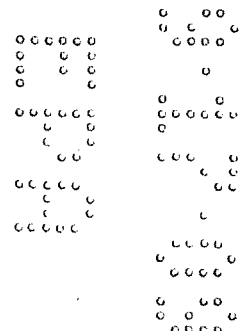
Enclosed you will find documentation to respond to your deficiency letter dated July 15, 2009 to correct the proper container disposal statement for Non-Refillable containers as per PR Notice 2007-4 and PR Notice 98-10 (II)(G) for an Antimicrobial Product, VeriGuard Plus (EPA Reg. #67869-44). There have 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*

Colleen M Snyder  
Manager of Regulatory Affairs  
enclosures



## 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 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 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 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 roll 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.

# 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%
<b>TOTAL.....</b>	<b>100%</b>

## 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. \_\_\_\_\_

NET WEIGHT \_\_\_\_\_ LBS / GALS.

SOLD BY:



**VERICHEM INC.**

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

Prof 9/09

### 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 178.170 and 178.300) for use in the manufacture of paper and paperboard that contacts food and for silndices. 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 assembly can be used to traverse the lagoon between treatment 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:**  
Adhesive 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)

### CAULKING 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 pickling 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 - 0.65% solution of VeriGuard® Plus.

### Dose Ranges:

Chrome leather (calculated on pick weight) .....	0.30 - 2.20%
Leather pasting adhesives .....	0.40 - 0.30%
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: (preservative paint and coating products) .....	2.50 - 50.0 lbs (250-5000 ppm)

### PIGMENTS, DYES, AND FILLER DISPERSION

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, brooks, polymers, olefomers, slum, 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)
Brooks: .....	0.10 - 0.30 lbs (10-30 ppm)
Oleofomers: .....	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)

### FOOD PACKAGING

For paper and paperboard intended for use in contact with food, the rate of application of this product must be adjusted so that the amount of active ingredient (Dodecylguanidine hydrochloride) retained does not exceed 0.4 percent by weight of the paper or paperboard. This product is effective in controlling microorganisms, such as bacteria, fungi, and yeasts, which cause deterioration of paper and paperboard products or articles molded from paper pulp. It may be added to the pulp stock in the beater or applied to the formed sheet by size press or roll coater, or as a uniform spray. If the product is used as a beater additive, the degree of retention of the active ingredient will depend upon the nature of the other additives in the system. Technical service is available from the manufacturer of this product to assist customers in making the proper and most efficient use of the product.

### METAL WORKING FLUIDS, LUBRICANTS AND MINERAL OIL BASED PRODUCTS

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

Mineral Oil-Based Products:	
Boring and Cutting Oils .....	0.50 - 1.80%
Cooling Fluids - Concentrate .....	9.50 - 49.0%
Ready for Use .....	0.50 - 1.40%
Fuel Oils .....	0.20 - 1.40%
Hydraulic Oils .....	0.50 - 2.40%
Non-Mineral Oil-Based Products:	
Cooling Fluids .....	0.50 - 1.40%
Cutting Oils .....	0.50 - 2.40%

### TEXTILES

VeriGuard® Plus should be dissolved in suitable solvents such as ethanol, 1,2-propanediol, mineral spirits, or paraffins or can be converted to a water dilutable alkaline concentrate and applied directly to the textile normally by dipping or spraying. The preservative is affixed to the fiber with a suitable acid like acetic acid. For the preservation of auxiliaries, VeriGuard® Plus is diffused in solvents as mentioned above or is homogeneously distributed with the aid of alkaline solutions or emulsion concentrates. Print thickeners are preserved by adding VeriGuard® Plus directly to the emulsion or homogeneously metered directly into the dried product. Miling may be necessary in order to obtain consistent particulate sizes.

### Recommended Dosages:

Auxiliaries (Sizing Agents, Finishing Agents, Astringents and Tarpaulins) 0.90 - 8.70%	
Cotton Production .....	0.90 - 2.60%
Felts .....	0.90 - 4.30%
Fire Hoses .....	1.70 - 5.20%
Geotextiles .....	0.90 - 8.70%
Julie, Sial .....	0.90 - 4.30%
Shower Curtains .....	0.90 - 3.50%
Spinning Preparations, Wetting Agents) .....	0.09 - 0.43%
Upholstery .....	0.90 - 3.50%
Wool Production .....	0.90 - 2.60%

### TEMPORARY SAPSTAIN CONTROL FOR FRESH CUT LUMBER AND OTHER LUMBER

VeriGuard® Plus is converted to alkaline liquid and water dilutable formulations by adding sodium hydroxide or other bases or by preparing emulsion concentrates of VeriGuard® Plus. Auxiliaries may also be added. For the temporary protection of freshly sawn lumber against staining and molding, VeriGuard® Plus solutions as prepared above are applied to the freshly sawn lumber by either dipping or spraying.

### Recommended Dosages:

Construction Woods .....	1.70 - 7.0%
Fresh Cut Lumber .....	1.70 - 7.0%
Fruit and Vegetable Containers .....	1.70 - 7.0%
Pallets .....	1.70 - 7.0%

**NOTICE:** Seller warrants that the product conforms to its chemical description as contained on this label and is reasonably fit for the purposes stated on this label when used in accordance with directions under normal conditions of use. **THE WARRANTIES MADE IN THIS PARAGRAPH ARE SELLER'S SOLE WARRANTIES WITH RESPECT TO THE PRODUCT AND ARE MADE EXPRESSLY IN LIEU OF AND EXCLUDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FOR FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIVES AND WARRANTIES.**

**NOTICE TO BUYER:** Buyer assumes all risks of use and handling which are in variance in any way with the directions hereon. There are no quantities, which extend beyond the description on this label.

**8, UN 3265, III  
CORROSIVE LIQUID, ACIDIC ORGANIC, N.O.S.  
(CONTAINS: DODECYLGUANIDINE HYDROCHLORIDE)**

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