

80285-2

10/6/2005

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OCT -6 2005

PromChemie AG  
Austrasse 79, P.O. Box 26  
FI-9490 Vaduz, Liechtenstein

AGENT: Edward C. Gray  
McDermott, Will and Emory  
600 13<sup>th</sup> Street, N.W.  
Washington, D. C. 20005

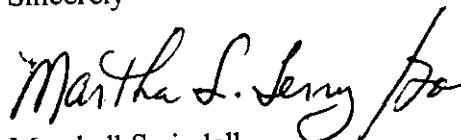
Subject: Promex 20S  
EPA Registration No. 80285-2  
Notification Dated September 16, 2005

This will acknowledge receipt of your notification to correct a typographical error in the rate information in the Directions For Use under the heading "Pesticide Formulations", 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 made a part of your file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely



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

CONCURRENCES

SYMBOL							
SURNAME							
DATE							



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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

<input checked="" type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input type="checkbox"/>	Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager M. SWINDELL	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PROMEX 20S	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) PromChemie AG, c/o Edward C. Gray / MWE 600 13th Street, NW Washington, DC 20005 <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. <u>80285-2</u> 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 type="checkbox"/> Other - Explain below.

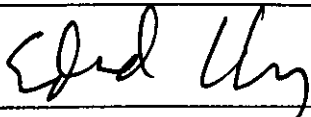
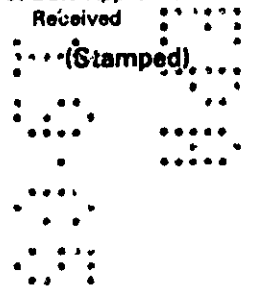
Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Correction of a typographical error in the rate information in the Directions for Use: under the heading "Pesticide formulations," change the percentage value from "(0.05 - 0.5%) to "(0.05 - 0.25%)" so that it correctly matches the application rate in pounds.

### Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
<i>Certification must submitted</i>		If "Yes" Unit Packaging wgt.      No. per container	If "Yes" Package wgt.      No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name EDWARD C. GRAY	Title U.S. AGENT	Telephone No. (Include Area Code) 202-756-8184
2. Signature  3. Title U.S. AGENT		6. Date Application Received (Stamped) 
4. Typed Name EDWARD C. GRAY	5. Date 16 SEP 2005	

# McDermott Will & Emery

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Boston Brussels Chicago Düsseldorf London Los Angeles Miami Milan  
Munich New York Orange County Rome San Diego Silicon Valley Washington, D.C.

Edward C. Gray  
Senior Regulatory Consultant  
egray@mwe.com  
(202) 756-8184

September 16, 2005

Document Processing Desk - NOTIF  
Office of Pesticide Programs(7504C)  
U. S. Environmental Protection Agency  
Room 266A, 2d floor, Crystal Mall 2  
1801 S. Bell Street  
Arlington, VA 22202-4501

Re: Transmittal Letter; EPA Reg. Nos. 80285-2;  
Notification to correct error in label

Dear Sir or Madam:

Enclosed is a completed application form regarding a product, EPA Reg. No. 80285-2, registered by PromChemie AG, for whom I am the US Agent. The form informs EPA that an error in the label for the product was discovered and will be corrected.

Please forward this to Mr. Marshall Swindell of Team 33, Antimicrobial Division.

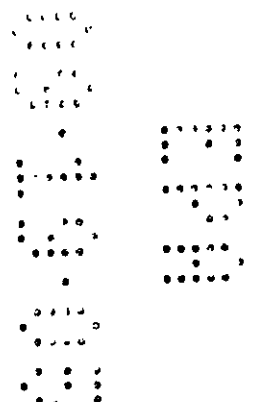
Thank you for your consideration of this matter.

Sincerely,



Edward C. Gray  
US Agent for PromChemie AG

Enclosure



OLD

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**DIRECTIONS FOR USE (continued)**

Typical applications, and the suggested range of concentrations on which trials can be based, are:

Type of Material To Be Protected	Lbs PROMEX™ 20S To Use Per 1000 Lb Of Material To Be Protected
<b>Latices</b> , such as: polymer latices based on monomers such as acrylate, butadiene, PVA or styrene; synthetic rubber/latex	0.5 to 1.5 lb (0.05 - 0.15 %)
<b>Oil-in-water emulsions</b> , such as textile spin-finish solutions, cutting/rolling oils, soluble oils (metal and engineering industries), and photographic emulsions. Note: limit amount of PROMEX™ 20S in metalworking fluid concentrate (to be diluted before use) to 3.0 % to reduce the possibility of dermal sensitization.	0.5 to 1.8 lb (0.05 - 0.18 %)
<b>Paints and coatings</b> , such as aqueous coatings, water-based paints, and emulsion paints	0.5 to 2.5 lb (0.05 - 0.25%)
<b>Inks and font solutions</b>	0.5 to 2.5 lb (0.05 - 0.25%)
<b>Water-based adhesives</b> , including animal glues, adhesives based on carboxymethylcellulose (CMC) and derivatives, gelatin and/or latex	0.5 to 2.5 lb (0.05 - 0.25%)
<b>Aqueous slurries of pigments</b> such as titanium dioxide or of minerals such as kaolin, calcium carbonate, calcium sulfate, or magnesium sulfate	0.4 to 1.25 lb (0.04 - 0.125 %)
<b>Building and construction compositions</b> , such as tape joint compounds, caulks, and sealants	0.8 to 2.5 lb (0.08 - 0.25 %)
<b>Pesticide formulations</b> , including in-can protection and protection of use dilutions	0.5 to 2.5 lb (0.05 - 0.5%)
<b>Home cleaning products</b> , including floor waxes and polishes, surface cleaners, window cleaners, and dish detergents	0.5 to 1.5 lb (0.05 - 0.15 %)
<b>Liquid laundry additives</b> , including laundry detergents, fabric softeners, and stain removers	0.5 to 1.5 lb (0.05 - 0.15 %)
<b>Car care products</b> , including car washing products, car waxes, and silicone emulsions	0.75 to 1.5 lb (0.075 - 0.15 %)
<b>Oil recovery materials</b> , such as drill muds, packer fluids, and completion fluids, containing polysaccharide fluid loss control agents and/or thickeners such as starch, guar, or xanthan gum	0.5 to 1.5 lb per 1000 lb of fluid (0.05 - 0.15 %), or 15 to 45 lb per 1000 lb of dry polysaccharide added to fluid (1.5 - 4.5%)
<b>Secondary oil recovery injection water</b> containing additives, such as polymer or micellar/polymer waterfloods using thickeners such as xanthan gum and/or polyacrylamides	0.15 to 1.5 lb (0.015 - 0.15 %) of total weight of fluid
<b>Leather processing solutions</b> , to preserve the solutions	0.25 to 2 lb (0.025 - 0.2 %)
<b>Fresh animal skins and hides</b> , to preserve the integrity of the hides and skins before or during processing. Add the appropriate quantity of PROMEX™ 20S to the brine solution during the curing operation or treat hides or skins with an appropriately diluted aqueous solution during other portions of the processing operation. The specific use rate and contact time needed to control microbial attack will depend on the degree of decomposition of the hides or skins prior to treatment.	1 to 24 pounds (13 fluid ounces to 1000 gallons) of PROMEX™ 20S per 1000 pounds of hides or skins  ACCEPTED WITH COMMENTS in EPA letter Dated: SEP 09 2004 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 80285-2
<b>Paper coatings and textile coatings</b> , including rosin dispersions, starch and casein based products	0.5 to 1.5 lb (0.05 - 0.15 %)
<b>Pulp &amp; paper mill system slime control</b> —The preferred method of addition is by <b>shock dosing</b> because this ensures that a high concentration of PROMEX™ 20S is present in the system for several hours. If a slime control agent is added by continuous methods over periods of several hours, its concentration in the system at all times is low. This can lead to the development of resistant organisms, which is less likely to occur when the shock dosing method is used.  It is not possible to give precise recommendations as to the quantity of PROMEX™ 20S to add to control slime formation, because the magnitude of the problem varies greatly from mill to mill, depending on the furnish employed, the cleanliness of the mill system, and the additional nutrients (for example, starch) that may be added to the stock. The following quantities of PROMEX™ 20S are suggested for trial: <b>Shock dosing:</b> If this preferred method is adopted, add 2.5 to 9 ounces of PROMEX™ 20S for each ton of paper produced per day as a single shock dose, the actual quantity to be used depending on the severity of the slime problem. This addition may be made to any part of the stock preparation or backwater system. Alternatively, the addition may be made to those parts of the system where it is known that slime deposits accumulate. <b>Continuous addition:</b> If this method is adopted, add PROMEX™ 20S continuously for either the single period of 8 hours during every 24 hours or for two separate periods of 4 hours during every 24 hours. Meter PROMEX™ 20S into the recirculated backwater at a rate of 7 to 8.5 ounces for each ton of paper produced during the dosing period.	

REVISED

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**DIRECTIONS FOR USE (continued)**

Typical applications, and the suggested range of concentrations on which trials can be based, are:

Type of Material To Be Protected	Lbs PROMEX™ 20S To Use Per 1000 Lb Of Material To Be Protected
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**Pulp & paper mill system slime control**—The preferred method of addition is by **shock dosing** because this ensures that a high concentration of PROMEX™ 20S is present in the system for several hours. If a slime control agent is added by continuous methods over periods of several hours, its concentration in the system at all times is low. This can lead to the development of resistant organisms, which is less likely to occur when the shock dosing method is used.

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