80282-2

07/22/20



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JUL 22 2008

Adams Technology System c/o for PromChemie AG 5145 Forest Run Trace – Suite B Alpharetta, GA 30022-4504

Attention: Rob Adams, Jr.

Subject: PROMEX 20S EPA Registration No. 80285-2 Amendment Application Date: April 23, 2008

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. EPA has no objection to the change of an alternate inert for the basic registration.

The basic and alternate Confidential Statement of Formulas (CSF) submitted with respect to registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, meets the requirements of PR 91-2 and 40 CFR 158.155 (Product Identity and Composition) and accurately reflects the Nominal Concentration for the active and inert ingredients. It is understood that the revised basic CSF dated January 1, 2007 will supersede all previously accepted ones.

The Agency also has no objection to adding an Alternate Brand Name (**PROMEX 20MGS**). A stamped copy of the accepted labeling is enclosed.

If you have any question or comments concerning this letter, please contact me at (703) 308 6341 or Demson Fuller at (703) 308-8062.

Sincerely,

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

[ABN's: PROMEX 20TS, PROMEX 20MGS]

FOR INDUSTRIAL USE ONLY AS AN ANTIMICROBIAL TO PROTECT AQUEOUS COMPOSITIONS SUCH AS LATICES, OIL-IN-WATER EMULSIONS, PAINTS AND COATINGS, INKS AND FONT SOLUTIONS, WATER-BASED ADHESIVES, AQUEOUS PIGMENT OR MINERAL SLURRIES, BUILDING AND CONSTRUCTION COMPOSITIONS, PESTICIDE FORMULATIONS, HOME CLEANING PRODUCTS, LIQUID LAUNDRY ADDITIVES, CAR CARE PRODUCTS, OIL RECOVERY MATERIALS, SECONDARY OIL RECOVERY FLUIDS, PAPER OR TEXTILE COATING COMPOSITIONS, PULP AND PAPER MILL SYSTEMS, OR LEATHER PROCESSING SOLUTIONS, OR INTENDED TO PROTECT FRESH ANIMAL HIDES OR SKINS

ACTIVE INGREDIENT:	•
1,2-benzisothiazolin-3-one	19.0%
INERT INGREDIENTS:	<u>81.0%</u>
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

CALL A POISON CONTROL CENTER OR DOCTOR IMMEDIATELY FOR TREATMENT ADVICE. HAVE THE PRODUCT CONTAINER OR LABEL WITH YOU WHEN CALLING A POISON CONTROL CENTER OR DOCTOR, OR GOING FOR TREATMENT.

EYES	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.			
SKIN	tf skin irritation or dermal exposure:			
	Take off contaminated clothes.			
	Rinse skin immediately with plenty of water for 15-20 minutes.			
	Call a poison control center or doctor for treatment advice.			
	lf inhalad			
	Move person to fresh air.			
	 If person is not breathing, call 911 or an ambulance, then give artificial respiration, 			
	preferably mouth-to-mouth if possible.			
<u></u>	Call a poison control center or doctor for further treatment advice.			
NGESTION	If swallowed:			
	Call a poison control center or doctor immediately for treatment advice.			
	 Have person sign a glass of water if able to swallow. 			
	 Do not induce vomiting unless told to do so by a poison control center or doctor 			

POISON CONTROL CENTER: CALL 1-800-222-1222

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

NET WEIGHT: PROMEX is a registered trademark of Prom ChemLtd	
licensed to PromChemie AG.	
Manufactured for: PromChemie AG	
Austrasse 79, P.O. Box 26, FL-9490 Vaduz, LiechtensterRodenticke Act as anthread, to the (011) 423-236-1818 EPA Reg. No. 80285-2	
EPA Reg. No. 80285-2 EPA Est. No. 81110-GBR-001	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes skin burns and irreversible eye damage. May be fatal if inhaled. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Do not breathe vapor or spray mist. Wear goggles or face shield, chemical resistant gloves, long pants and long sleeved shirt. Wear a mask or pesticide respirator approved by the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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 wastes. Do not apply in marine or estuarine oil fields.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Protect from frost. If frozen, allow to thaw and stir well before use.

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

EMERGENCIES: In emergency situations, such as spills, fire, or exposure, call 1-800-424-9300

WARRANTIES AND WARRANTY DISCLAIMERS

PromChemie AG ("PROM") warrants that this product conforms to the chemical description on the label and that it is reasonably fit for the purposes stated on the label when used in accordance with PROM's directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to PROM, and the buyer assumes the risk of any such use. PROM DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY.

IN NO EVENT SHALL PROM BE LIABLE FOR ANY SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, INCLUDING LOST PROFITS, ON ANY THEORY WHATSOEVER, INCLUDING NEGLIGENCE, and PROM's sole liability and Buyer's and User's exclusive remedy shall be limited to the refund of the purchase price. Statements concerning the use of products or the formulations described therein re not to be construed as recommending the infringement of any patent and no liability for infringement arising out of any such use is assumed by PROM.

DIRECTIONS FOR USE (Extract from Technical Information Bulletin for PROMEX™ 20S]

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

PROMEX[™] 20S is an effective preservative in most aqueous compositions. The concentration required to give protection depends on several factors. These include the susceptibility of the system to microbiological degradation, the extent to which micro-organisms can gain access, the species involved, pH, temperature, and length of time for which protection is required. For protection against bacterial attack, a concentration within the range 0.02-0.25% PROMEX[™] 20S is almost invariably sufficient. The control of mold growth, particularly on paste products of high solids content, may occasionally require demand dosages above 0.25%. In dilute fluid systems, spoilage is usually controlled with dosages not greater that 0.09%. Do not use at concentration greater than 0.5%.

See other panel for directions for specific applications.

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Trials at different concentrations are recommended. 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	
Latices, 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%)
Oil-in-water emulsions 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 to1.8 lb	(0.05 – 0.18%)
Paints and coatings, such as aqueous coatings, water-based paints, and emulsion paints	0.5 to 2.5 lb	(0.05 – 0.25%)
Inks and font solutions	0.5 to 2.5 lb	(0.05 – 0.25%)
Water-based adhesives, including animal glues, adhesives based on carboxymethylcellulose (CMC) and derivatives, gelatin and/or latex	0.5 to 2.5 lb	(0.05 – 0.25%)
Aqueous slurries of pigments 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%)
Building materials, such as caulks, sealants, grouts, spackling, ready-mixed cement and wallboard compounds, and tape joint compounds	0.8 to 2.5 lb	(0.08 – 0.25%)
Pesticide formulations , including in-can protection and protection of use dilutions	0.5 to 2.5 lb	(0.05 – 0.25%)
Home cleaning products, including floor waxes and polishes, surface cleaners, window cleaners, and dish detergents	0.5 to 1.5 lb	(0.05 – 0.15%)
Liquid laundry additives, including laundry detergents, fabric softeners, and stain removers	0.5 to 1.5 lb	(0.05 – 0.15%)
Car care products, including car washing products, car waxes, and silicone emulsions	0.75 to 1.5 lb	(0.075 – 0.15%)

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Oil recovery materials, 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 (0.05 – 0.15%) of total weight of the fluid , or 15 to 45 lb per 1000 lb of dry polysaccharide added
Secondary oil recovery injection water 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
Leather processing solutions, to preserve the solutions	0.25 to 2 lb (0.025 – 0.20%)
Fresh animal skins and hides, 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 2.5 gallons) of PROMEX™ 20S per 1000 pounds of hides or skins
Paper coatings to be used in papermaking, including rosin dispersions, starch and casein based products	0.5 to 1.5 lb (0.05 – 0.15%)
Pulp & paper mill system slime control	1

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.

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:

Shock dosing: 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.

Continuous addition: 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.

ACCEPTE JUL 2 2 2008 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Rep. No.

PRECAUTIONARY STATEMENTS

Keep Out of Reach of Children DANGER

Hazards to Humans and Domestic Animals

Corrosive. Causes skin burns and irreversible eye damage. May be fatal if inhaled. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. do not breathe vapor or spray mist. Wear goggles or face shield, chemical resistant gloves, long pants and long sleeved shirt. Wear a mask or pesticide respirator approved by the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

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 the first 5 minutes then continue rinsing. Call a poison control center or doctor for treatment advice.

If Swallowed: Call a 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 by a poison control centre doctor.

If Inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

If on Skin: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes. Call a poison control centre or doctor for treatment. Wash contaminated clothing and footwear before reuse.

Poison Control Center:

Call 1-800-222-1222

Have the product container or label or this Bulletin with you when calling a poison control center, doctor, or going for treatment.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

ENVIRONMENTAL HAZARDS

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This product is toxic to fish. Do not discharge 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 wastes. Do not apply in marine and estuarine oil fields.

STORAGE AND DISPOSAL

Prohibitions

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Storage

Protect from frost. If frozen, allow to thaw and stir well before use.

Pesticide Dispósal

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 label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

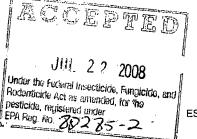
Container Disposal

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

For information on spills, call 1-800-424-9300

Safe Handling Information

Refer to the Material Safety Data Sheet (MSDS) available from PromChemie AG for information on the safe use, handling and disposal of this product.



PromChemie AG PROMEX[™] 20S Technical Information Bulletin

Warranties and Warranty Disclaimers

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IN NO EVENT SHALL PROM BE LIABLE FOR ANY SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, INCLUDING LOST PROFITS, ON ANY THEORY WHATSOEVER, INCLUDING NEGLIGENCE, and PROM's sole liability and Buyer's and User's exclusive remedy shall be limited to the refund of the purchase price. Statements concerning the use of products or the formulations described therein re not to be construed as recommending the infringement of any patent and no liability for infringement arising out of any such use is assumed by PROM.

For technical information, literature, sample and order information, please contact PromChemie AG at:

PromChemie AG Austrasse 79, P.O. Box 26 FL-9490 Vaduz, Liechtenstein Phone (011) 423-236-1818

