83451-17 7-11-2008 C

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UNITED S TES ENVIRONMENTAL PROTECTION AGENCY

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**Washington, D.C. 20460**

July 11, 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ross Beattie
Product Registration Specialist
BWA Water Additives US LLC
1979 Lakeside Parkway, Suite 925
Tucker, GA 30084

Subject: Bromicide 4000
EPA Registration No. 83451-17
Application Date: June 10, 2008
Receipt Date: June 16, 2008

Dear Mr. Beattie:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

**Proposed Notification**

- Change of primary brand name to "Bromicide 4000"

**General Comments**

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Y. Henson
Product Reviewer (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

| CONCURRENCES | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| SYMBOL | 7510P | 7510P | | | | | | |
| SURNAME | EEBerry | Henson | | | | | | |
| DATE | 7/11/08 | 7/11/08 | | | | | | |

EPA Form 1320-1A (1/90) Printed on Recycled Paper OFFICIAL FILE COPY

BWA™
Water Additives

BWA Water Additives
1979 Lakeside Parkway
Suite 925
Tucker, GA 30084

Tel 678 802 3050
Fax 678 802 3024

June 10, 2008

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4400
One Potomac Yard, 277 South Crystal Drive
Arlington, VA 22202-4501

Attn: Ms. Emily Mitchell
Product Manager No. 32

***Re:*** ***Primary Name Change Notification for BWA Liquibrom 4000***
EPA File Symbol 83451-17

Dear Ms. Mitchell:

BWA Water Additives US LLC (BWA) is submitting this notification of a change to the primary name of the product *BWA Liquibrom 4000* to the new name: *BromiCide 4000.*

## Certification Statement

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 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 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.

I understand that I may not sell or distribute this antimicrobial product until I receive EPA notice of approval or until 60 days after submission, whichever comes first.

Sincerely,

Ross Beattie
Product Registration Specialist

Enclsoures: Copy of labeling with changes highlighted

*Please read instructions on reverse before completing form.* Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
**Environmental Protection Agency**
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

## Application for Pesticide - Section I

| 1. Company/Product Number | 2. EPA Product Manager | 3. Proposed Classification |
|---|---|---|
| 83451-17 | Emily Mitchell | [x] None [ ] Restricted |
| **4. Company/Product (Name)** | **PM#** | |
| BWA Liquibrom 4000 | 32 | |

**5. Name and Address of Applicant** *(Include ZIP Code)*

BWA Water Additives U.S. LLC
1979 Lakeside Parkway, Suite 925
Tucker, GA 30084

[ ] *Check if this is a new address*

**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 - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [x] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

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

Notification of Primary Product Name Change per PR Notice 98-10. This is a notification request to change the primary product name to BromiCide 4000, the Certification Statement for this notification is included in the accompanying letter.

## Section - III

**1. Material This Product Will Be Packaged In:**

| Child-Resistant Packaging | Unit Packaging | Water Soluble Packaging | 2. Type of Container |
|---|---|---|---|
| [ ] Yes | [ ] Yes | [ ] Yes | [ ] Metal |
| [x] No | [x] No | [x] No | [x] Plastic |
| ** Certification must be submitted* | If "Yes" Unit Packaging wgt. / No. per container | If "Yes" Package wgt / No. per container | [ ] Glass<br>[ ] Paper<br>[ ] Other (Specify) _____ |

| 3. Location of Net Contents Information | 4. Size(s) Retail Container | 5. Location of Label Directions |
|---|---|---|
| [x] Label [ ] Container | Bulk containers 50 to 3000 lbs | [x] On label |

6. Manner in Which Label is Affixed to Product: [x] Lithograph [x] Paper glued [ ] Stenciled [ ] Other _____

## Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

| Name | Title | Telephone No. (Include Area Code) |
|---|---|---|
| Dana S. Lateulere | Consultant | 301-743-6050 |

### 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 knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

| 2. Signature | 3. Title |
|---|---|
| Ross Beattie | Product Registration Specialist, BWA Water Additives LLC |
| **4. Typed Name** | **5. Date** |
| Ross Beattie | June 10/08 |

STORAGE AND DISPOSAL:
STORAGE. Keep product dry in tightly closed original container when not in use. Store in a cool, dry, well ventilated area. Product should be stored at 0 degrees F or above.

DISPOSAL. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. DO NOT REUSE EMPTY CONTAINER. Triple rinse the container (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate. Burn only if allowed by state and local authorities. If burned, stay out of smoke.

PRECAUTIONARY STATEMENTS:
HAZARDS TO HUMANS AND DOMESTIC ANIMALS. CAUTION. Causes moderate eye irritation. Avoid contact with eyes, skin and clothing. Wash with soap and water after handling. Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS:
[illegible]im bromide is not flammable. However, in fires fueled by other materials, [illegible]gen bromide or bromine may be released. In case of fire, wear self-contained breathing apparatus.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic organisms. 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.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

RECIRCULATING COOLING WATER SYSTEMS, INCLUDING AIR WASHERS AND BREWERY PASTEURIZERS:
When used in conjunction with an oxidant, this product effectively controls algal, bacterial, and fungal slime and controls the settlement and growth of mollusks such as the zebra mussel (Dreissena) or the Asiatic clam (Corbicula) in commercial and industrial cooling towers; influent water systems such as flow through filters, cooling ponds, canals, and lagoons; heat exchange water systems; air washers; pasteurizers; retort systems; and industrial water scrubbing systems.

DOSAGE RATES.
Add this product to the system at a 0.125 to 2.0 sodium bromide/oxidant mole ratio. For example:
1) 1.6 to 26.5 pounds of chlorine gas (99.9%) per gallon of sodium bromide solution; or,
2) [illegible]21.2 gallons sodium hypochlorite (12.5% available chlorine) solution per gallon [illegible]lium bromide solution.

Initial Dose:
When the system is noticeably fouled, add 0.0003 to 0.024 gallons of this product per 1000 gallons of water contained in the system and oxidize with either gas chlorine (0.008 to 0.040 pounds gas chlorine per 1000 gallons of contained water), or sodium hypochlorite solution (0.007 to 0.032 gallons of 12.5% sodium hypochlorite solution per 1000 gallons of contained water).

Subsequent Dose:
When microbial control is evident, add 0.0002 to 0.024 gallons of this product per 1000 gallons of water contained in the system and oxidize with either gas chlorine (0.004 to 0.040 pounds gas chlorine per 1000 gallons of contained water), or sodium hypochlorite solution (0.003 to 0.032 gallons of 12.5% sodium hypochlorite solution per 1000 gallons of contained water).

ONCE-THROUGH COOLING WATER AND WASTE WATER TREATMENT SYSTEMS:
When used in conjunction with an oxidant, this product effectively controls algal, bacterial and fungal slime and controls the settlement and growth of mollusks such
(continued)

# BromiCide 4000

For use as a Bactericide, Fungicide, Algicide, and Mollusk Control Agent, and for Control of Microbial Slimes in: Recirculating Cooling Water Systems, Once-Through Cooling Water Systems, Wastewater Treatment Systems, Brewery Pasteurizers, and Pulp and Paper Mill Water.

| ACTIVE INGREDIENT: | |
|---|---|
| Sodium Bromide | 40.0% |
| OTHER INGREDIENTS | 60.0% |
| TOTAL INGREDIENTS | 100.0% |

KEEP OUT OF REACH OF CHILDREN

# CAUTION

FIRST AID:

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 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.

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 vomiting unless told to do so by the poison cotrol center or doctor.
-Do not give anything by mouth to an unconscious person.

IN CASE OF TRANSPORT EMERGENCY, CALL 1-800-424-9300 (CHEMTREC).

SEE OTHER PRECAUTIONS ON SIDE PANEL.

Manufactured for:
BWA Water Additives US LLC
1979 Lakeside Parkway, Suite 925
Tucker, GA 30084
678-802-5000

EPA REG. NO. 83451-17

EPA EST. NO. 5785-AR-02

xxxxxx

060308

NET WEIGHT: 2000 lb

DIRECTIONS FOR USE CONTINUED:
as the zebra mussel (Dreissena) or the Asiatic clam (Coroicula) in once-through fresh and sea water cooling systems, cooling ponds canals, lagoons and secondary and tertiary wastewater treatment systems.

DOSAGE RATES.
Add this product to the system at a 0.125 to 2.0 sodium bromide/oxidant mole ratio. For example:
1) 1.6 to 26.5 pounds of chlorine gas (99.9%) per gallon of sodium bromide solution; or,
2) 1.3 to 21.2 gallons sodium hypochlorite (12.5% available chlorine) solution per gallon of sodium bromide solution.

Initial Dose:
When the system is noticeably fouled, add 0.0008 to 0.049 gallons of this product per 1000 gallons of water contained in the system and oxidize with either gas chlorine (0.02 to 0.08 pounds gas chlorine per 1000 gallons of contained volume), or sodium hypochlorite solution (0.02 to 0.06 gallons of 12.5% sodium hypochlorite solution per 1000 gallons of contained volume).

Subsequent Dose:
When microbial control is evident, add 0.0003 to 0.049 gallons of this product per 1000 gallons of water contained in the system and oxidize with either gas chlorine (0.008 to 0.08 pounds gas chlorine per 1000 gallons of contained volume), or sodium hypochlorite solution (0.006 to 0.06 gallons of 12.5% sodium hypochlorite solution per 1000 gallons of contained volume).

FRUIT AND VEGETABLE WASH:
When used in conjunction with an oxidant (Chlorine gas or NaOCl), this product can be used for the wash and transport of fruits and vegetables. This product and oxidant should be added at a rate not to exceed a dosage of 55 ppm of product (38.5 gallons of this product per one million gallons of water treated). Apply sufficient amount of this product and chlorine or sodium hypochlorite to achieve a residual bromine level of 0.5 to 5 ppm when measured approximately 5 minutes after treatment. The recommended activation mix of this product and oxidant is a one to one molar ratio. Chlorine dose (99%) 3.3 pounds, 10% NaOCl dose (3.3 gallons) or 15% NaOCl dose (2.0 gallons) will activate one gallon of this product (40% sodium bromide solution). This product may be continuously metered to Chlorinator eductor water or mixed with a NaOCl solution for activation. The use of this product under this application must be followed by a potable water rinse to remove, to the extent possible, residues of the chemical.

PULP AND PAPER MILLS:
When used in conjunction with an oxidant, this product effectively controls algal, bacterial, and fungal slime in pulp and paper mill fresh and sea water influent water systems; cooling water systems, wastewater treatment systems, service water systems, white water systems, non-potable water systems, and other process water.

DOSAGE RATES.
Add this product to the system at a 0.125 to 2.0 sodium bromide/oxidant mole ratio. For example:
1) 1.6 to 26.5 pounds of chlorine gas (99.9%) per gallon of sodium bromide solution; or,
2) 1.3 to 21.2 gallons sodium hypochlorite (12.5% available chlorine) solution per gallon of sodium bromide solution.

Add sufficient amount of mixed product/oxidant solution to achieve a residual bromine level of 0.5 to 5.0 parts per million. For 0.5 parts per million add 0.00057 gallons of product and 0.0018 gallons of (12.5%) bleach or 0.0019 pounds gas chlorine per 1,000 gallons of water treated.

Treatment levels of this product and oxidant can best be measured with test kits for either bromine or chlorine. Tests should be made immediately after drawing water samples from the system. Use test kits according to directions.

1. When a bromine test kit is used, results can be read directly as parts per million bromine.

2. When a chlorine test kit is used, results can be expressed in terms of bromine by multiplying chlorine values by the conversion factor 2.25.

This product weighs 11.9 pounds/gallon at 70° F.

NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.