

83451-17

07/08/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JUL - 8 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

FILE COPY

Subject: Bromocide 4000
EPA Reg. No. 83451-17
Application Dated: June 11, 2010
Receipt Date: June 14, 2010

Dear Mr. Beattie:

The following notification submitted in connection with registration under the provisions of PR Notice 98-10, is acceptable.

Proposed Notification:

- Revised Storage and Disposal language to add the statement "Do not contaminate water, food, or feed by storage and disposal."

Comments:

Based on a review of the material submitted, the following comments apply:

This application for notification, as referenced above, is acceptable. A copy has been placed in our records for future reference.

Should you have any questions concerning this letter, please contact me at Henson.Wanda@epa.gov or call (703) 308-6345.

Sincerely,

A handwritten signature in black ink, appearing to read "Wanda Henson".

Wanda Henson
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
Washington, DC 20460

Registration
Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83451-17	2. EPA Product Manager Emily Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bromicide 4000	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives U.S. LLC 1979 Lakeside Parkway, Suite 925 Tucker, GA 30084 <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 type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Notification of Storage and Disposal Statements change per PR Notice 98-10. This is a notification request to add a Storage and Disposal Statement to BromiCide 4000 (83451-17) that has no potential to cause unreasonable adverse effects to the environment. The Certification Statement for this notification is included in the accompanying letter.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Metal <input checked="" type="checkbox"/> Plastic Glass Paper Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Bulk containers 50 to 3000 lbs		5. Location of Label Directions <input checked="" type="checkbox"/> On label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued 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 Ross Beattie	Title Product Registration Specialist	Telephone No. (Include Area Code) 678-802-3032
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<p>Certification</p> <p>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.</p>		<p>6. Date Application Received (Stamped)</p>
2. Signature 	3. Title Product Registration Specialist, BWA Water Additives LLC	
4. Typed Name Ross Beattie	5. Date June 11, 2010	



BWA Water Additives
1979 Lakeside Parkway
Suite 925
Tucker, GA 30084
Tel 678 802 3050
Fax 678 802 3024

June 11, 2010

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: Storage and Disposal Statement Notification for Bromicide 4000
EPA File Symbol 83451-17

Dear Ms. Mitchell:

BWA Water Additives US LLC (BWA) is submitting this notification of the additional Storage and Disposal statement "Do not contaminate water, food, or feed by storage and disposal." to our Bromicide 4000 (EPA Reg. No. 83451-17). BWA does not feel that the addition of this statement has any potential to cause unreasonable adverse effects to the environment.

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
Enclosures: Copy of labeling with changes highlighted

www.wateradditives.com

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) 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 0.0003 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).

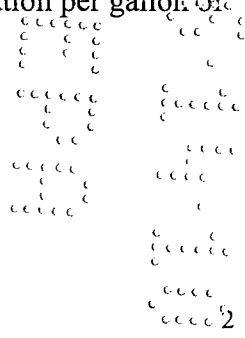
Subsequent Dose: When microbial control is evident, add 0.0002 to 0.024 gallons of this product per 1000 gallons of water contained in the system and oxidize with either gas chlorine (0.004 to 0.040 pounds gas chlorine per 1000 gallons of contained water), or sodium hypochlorite solution (0.003 to 0.032 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 as the zebra mussel (*Dreissena*) or the Asiatic clam (*Corbicula*) in once-through fresh and sea water cooling systems, cooling ponds, canals, and 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.

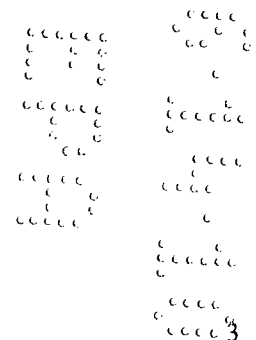
PULP AND PAPER MILLS:

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.

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by 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°F or above.

{Text for non-refillable containers}

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying.

{For containers of 5 gallons or less} [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.]

{For containers with capacities of greater than 5 gallons} [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. 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 tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.]

{Text for refillable containers}

CONTAINER DISPOSAL: Refillable container. Refill this container with sodium bromide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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:

Sodium bromide is not flammable. However, in fires fueled by other materials, hydrogen 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

