



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OCT - 4 2006

Michael Harvey
Enviro Tech Chemical Services, Inc.
500 Winmoore Way
Modesto, CA. 95358

RE: Revised labeling dated September 18, 2006
Product Name: BromMax
EPA Registration Number: 63838-3

Dear Mr. Harvey:

The Agency has reviewed your request for an alternate Confidential Statement of Formula (CSF) submitted in accordance with continuing registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the action to be acceptable.

In summary, your request to amend the label by adding the oil field recovery use and returning the once-through-use sub heading to the Heat Transfer use is approved. As you correctly point out, this use was approved on your original registration and would support the new use as well. A copy of your accepted label is enclosed.

If you have questions concerning this letter, please contact Tom Luminello by telephone, (703) 308-8075, or by e-mail at luminello.tom@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Emily H. Mitchell".

Emily H. Mitchell
Product Manager 32

Antimicrobials Division (7510-P)

Enclosure

BromMax™

BromMax is an effective agent for controlling algae, bacteria and slime in condensing and cooling equipment in which recirculating water is used as the cooling media and in reservoirs or ponds which serve as the source of boiler feedwater or cooling water. BromMax can also be used to control bacterial slime and algae in decorative fountains, air washers, papermill influent water systems, and food, beverage, and industrial process pasteurizers.

ACTIVE INGREDIENTS:

Sodium hypochlorite.....	10.70%
Sodium bromide.....	14.77%
INERT INGREDIENTS.....	74.53%
Total.....	100%

Total Available bromine = approximately 23%
Total Available chlorine = approximately 10.2%

KEEP OUT OF REACH OF CHILDREN
DANGER

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 eyes.
- Call a poison control center or a doctor for treatment advice.

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 a doctor for treatment advice.

If swallowed:

- Call a poison control center or a doctor immediately for treatment advice.
- **DO NOT INDUCE VOMITING.**
- Do not give anything to drink.

If inhaled:

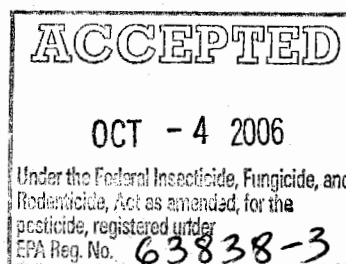
- Move to fresh air.
- If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or a doctor for further treatment advice.

NOTE TO PHYSICIAN:

Aspiration may cause lung damage. Probable mucosal damage may contraindicate the use of gastric lavage.

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

In case of Medical Emergency, call 24 hrs 209-581-9576



SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. Causes irreversible eye damage. Causes skin burns. Do not get in eyes, on skin or on clothing. Wear protective eyewear such as face shield or safety glasses and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Wash thoroughly after handling.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollution 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of EPA.

STORAGE AND DISPOSAL

Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not reuse empty container but place in trash collection. Do not contaminate water, food, or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide disposal 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

PLASTIC CONTAINERS: Do not reuse empty container. Triple rinse (or equivalent). Then puncture and dispose of in a sanitary landfill, or, if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

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

Basic Guidelines: This product is UV light sensitive, and may be applied at nighttime in most systems if excessive exposure may be a limiting factor. As a general rule, the total bromine level should be checked with a chlorine or bromine test kit at the bleed-off point furthest from the point of injection.

Initial dose: When the system is noticeably fouled, a precleaning may be necessary. Then apply sufficient BromMax to achieve 2.4-9.0 ppm total bromine (1-4 ppm as chlorine) or as needed to maintain biofilm or microbial control.

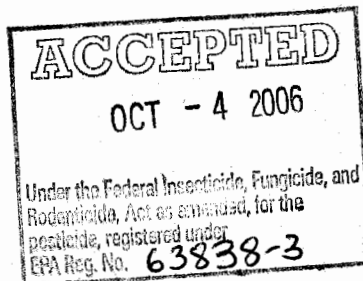
Subsequent doses: This product may be added using continuous or intermittent dosing methods to provide adequate control. Continuous addition methods may obtain adequate control at total bromine levels as low as 0.4 ppm. Adjust levels of total bromine accordingly to maintain desired control. BromMax at a dosage of two fluid ounces per 1000 gallons of water gives a residual of approximately 5.1 ppm of total bromine (2.3 ppm as chlorine).

INDUSTRIAL & COMMERCIAL RECIRCULATING COOLING WATER, HEAT TRANSFER and ONCE-THROUGH WATER SYSTEMS, and PASTEURIZERS: BromMax should be applied directly to the cooling water at any section of the system where sufficient mixing will occur. It should be added to the system at a point of uniform mixing such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system. BromMax may be applied on a slug dose basis to the cooling water to provide a total bromine level of 1.0-9 ppm. Note that adequate algae control may require occasional intermittent slug dosing at a minimum 3-6 ppm as total bromine. Some systems may be maintained in satisfactory biological condition by applying this dosage once per day while others will respond better to dosages more or less than once per day. For continuous dosing, feed product at a rate that maintains adequate control (1-3 ppm as total bromine).

COOLING PONDS, LINED RESERVOIRS AND DECORATIVE FOUNTAINS: BromMax may be applied at the lined reservoir, pond, or fountain inlet or at a location that permits complete diffusion into the water at maximum retention time before reaching the outlet. Sufficient BromMax should be fed to maintain a total bromine level of 1.0-9.0 ppm in all parts of the reservoir or pond (two fluid ounces per 1000 gallons of water yields 5.1 ppm total bromine).

AIR WASHERS (*This product may be used only in industrial air washers and air washer systems which have mist-eliminating components.*): For control of microorganisms in industrial air washer systems add sufficient BromMax to the air washer sump or chilled water to provide a total bromine of 1.0-9 ppm throughout the system. The total bromine level should be checked with a test kit and additional product should be applied until a sufficient residual is obtained at the bleed-off point. Some systems may be maintained in satisfactory biological condition by applying this dosage once per day while others will respond better to dosages more or less than once per day.

SHELL EGG PASTEURIZER WATER SYSTEMS: (not for use in California) For control of bacteria and associated slime in shell egg pasteurizer water systems add 1-3 ounces of BromMax per 1000 gallons of system water to achieve control. To maintain control add sufficient BromMax to maintain 2.5-7.5 ppm total bromine throughout the system. (Two fluid ounces per 1000 gallons of water yields 5.1 ppm total bromine).



FOR PULP & PAPER MILL INFLUENT WATER SYSTEMS: (not for use in California) BromMax should be applied to the raw water intake prior to the filter house, economizer, or process water. Feed at a dosage sufficient to provide a total bromine level of 1.0-9.0 ppm. BromMax at a dosage of two fluid ounces per 1000 gallons of water gives a residual of approximately 5.1 ppm of total bromine, but a different dosage may be required to provide adequate control throughout the system. Some systems may be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. BromMax may be used in pulp and paper influent water systems where the manufactured paper or paperboard may be used for food contact purposes.

FOR PULP & PAPER MILL PROCESS WATER SYSTEMS: (not for use in California) BromMax should be added to a paper making system at a point of uniform mixing such as the beaters, broke chest pump, save-all tank, or white water tank. Feed at a dosage sufficient to provide a total bromine level of 1.5-9.0 ppm. BromMax at a dosage of two fluid ounces per 1000 gallons of water gives a dosage of approximately 5.1 ppm of total bromine, but a different dosage may be required to provide a adequate control throughout the system. Some systems may be maintained in satisfactory biological condition by applying this dosage intermittently while others may require a continuous application. BromMax may be used in pulp and paper mill process water systems where the manufactured paper or paperboard may be used for food contact purposes.

OIL AND SECONDARY OIL RECOVERY SYSTEMS, DRILLING MUDS AND PACKER FLUIDS: BromMax may be used to treat water used in primary or secondary oil recovery systems to control the growth of anaerobic sulfide-forming bacteria (Desulfibrio desulfuricans), and aerobic slime-forming bacteria. BromMax may be used in seawater or fresh water recycled or disposal/recovery systems, muds or fluids. BromMax controls biofilm deposits on pumps, pipework, heat exchangers, and filters associated with oilfield systems. It also controls biofilm deposits downhole in formations. Add sufficient amount of BromMax to achieve a residual total bromine level of 2.2-10 ppm. A dosage of two fluid ounces per 1000 gallons of water yields approximately 5.1 ppm of total bromine.

NOTE: Halogen dosages listed in these various applications are expressed as total bromine. Since most field test kits for oxidizing halogens give values in terms of chlorine, simply multiply the reading from the test kit (as chlorine) by 2.25 in order to obtain the bromine equivalency listed in these directions.

EPA Reg. No. 63838-3

EPA Est. No.: 63838-CA-01

US Patent No. 7,045,153

Other US and Global Patents Pending.

NET CONTENTS SHOWN ELSEWHERE ON CONTAINER

**Enviro Tech Chemical Services, Inc.
500 Winmoore Way
Modesto, CA 95358**

Ver. 3.0

