

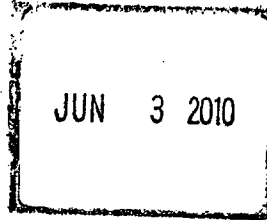
1839-138

06-03-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Thomas W. Isaac
Sr. Regulatory Specialist
Stepan Company
22 W. Frontage Rd.
Northfield, IL 60093



SUBJECT: 10% BTC 99 Commercial and/or Industrial Recirculating Cooling
Water Tower Microbicide
EPA Registration Number: 1839-138
Application Date: March 9, 2010
Receipt Date: March 10, 2010

Dear Mr. Isaac:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the conditions listed below:

Conditions

1. Revise the Precautionary Statements to include the following: "...soap and water after handling and before eating, drinking, using tobacco *or using the toilet.*"
2. Revise the Environmental Hazards statement to include: "This pesticide is toxic to fish *and aquatic invertebrates.* Do not discharge..."
3. Revise the Directions for Use, section beginning "Do not be alarmed..." to include the following mandatory language as per PR Notice 2000-5: "This debris *must* be removed from the system to avoid..."
4. Revise the Directions for Use, Heat Transfer Systems to include the following mandatory language as per PR Notice 2000-5: "This product (product name) *is* used at..." and "Add to the system at a point of..."

CONCURRENCES

SYMBOL	7510P						
SURNAME	S. Isaac						
DATE	6/3/10						

5. Revise the Container Disposal section to include the following information: "Offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke."

The current rinsing instructions are appropriate for containers 5 gallons and smaller but incorrect for containers greater than 5 gallons. Add the following rinsing instructions for rinsing of containers greater than 5 gallons: "Triple rinse container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 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."

General Comments

A stamped copy of the accepted labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
 Product Manager (31)
 Regulatory Management Branch I
 Antimicrobials Division (7510P)

7510P:T.Lantz:6/3/10:1839-138 accept label amend

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

10% BTC[®] 99 Industrial and/or Commercial Recirculating Cooling Water Tower Microbicide

Microbicide for industrial and/or commercial recirculating cooling towers, [air washers and heat transfer systems (evaporative condensers, dairy sweetwater systems, cooling canals, pasteurizers, tunnel coolers and warmers)—Not for use in California]

Helps keep cooling tower, [air washer, and heat transfer systems—Not for use in California] clear and free of visible algal, bacterial, and fungal slimes.

ACTIVE INGREDIENT:

Didecyl dimethyl ammonium chlorides..... 10.0%

INERT INGREDIENTS:..... 90.0%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

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

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 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 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 do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

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

(OPTIONAL) You may contact xxx/xxx-xxxx for emergency medical treatment information.

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

See side (back) panel for additional precautionary statements.

EPA REG. NO. 1839-138
EPA EST. NO. 1839-IL-01

STEPAN COMPANY
22 West Frontage Road
Northfield, IL 60093

NET CONTENTS

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN - 3 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

1839-138

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DIRECTIONS FOR USE

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

10% BTC® 99 Industrial and/or Commercial Recirculating Cooling Water Tower Microbicide (this product) (product name) is designed to control algae and bacteria in cooling tower systems, air washers and heat transfer systems.

RECIRCULATING COOLING TOWERS:

Initial Dose: Add 19 to 80.5 fluid ounces of this product (product name) per 1,000 gallons of water contained in the system to provide a concentration of 150 to 630 ppm of this product (15 to 63 ppm active quaternary). Repeat until control is evident. When system is in control, add:

Periodic Dose: Add 6.5 to 80.5 fluid ounces of this product (product name) per 1,000 gallons of water contained in the system (5 to 63 ppm active quaternary) every 7 days or sooner should visible growth appear. For best results, clean heavily contaminated systems before treatment with this product. If soap or anionic detergent is used, rinse thoroughly before charging with this product (product name). Apply this product (product name) at a point in the system where uniform mixing will take place.

Not for use in California.

HEAT TRANSFER SYSTEMS (Evaporative condensers, dairy sweetwater systems, cooling canals, pasteurizers, tunnel coolers and warmers): This product (product name) should be used at the same application rates as in recirculating cooling water systems. It should be added to the system at a point of uniform mixing such as the basin area or other reservoir or collecting area from which treated water will be dispersed uniformly throughout the system.

Initial Dose: Add 19 to 80.5 fluid ounces of this product (product name) per 1,000 gallons of water contained in the system to provide a concentration of 150 to 630 ppm of this product (15 to 63 ppm active quaternary). Repeat until control is evident. When system is in control, add:

Periodic Dose: Add 6.5 to 80.5 fluid ounces of this product (product name) per 1,000 gallons of water contained in the system (5 to 63 ppm active quaternary) every 7 days or sooner should visible growth appear. For best results, clean heavily contaminated systems before treatment with this product (product name). If soap or anionic detergent is used, rinse thoroughly before charging with this product (product name).

AIR WASHER SYSTEMS: Add to the air washer sump or chill water or to the coil spray water to insure uniform mixing at a rate of 6.5 to 80.5 fluid ounces of this product (product name) per 1,000 gallons of water in the system (5 to 63 ppm active quaternary) every 7 days or sooner depending on the severity of contamination.

Do not be alarmed with the sudden appearance of organic debris in the system during the first week of operation. This is normal and is a good indication that this product (product name) has effectively penetrated and dislodged dead organic material, which tenaciously adheres to metal and wooden surfaces as living matter. This debris should be removed from the system to avoid clogging of screens and pipes.

When this product (product name) is used as directed, it will aid in controlling the development of biomass deposits and algal slime formation which are unsightly, produce foul odors and which are often the cause of equipment breakdown and loss of cooling efficiency.

This product (product name) is compatible with virtually all corrosion inhibition additives, but should not be used in the presence of soap or other anionic detergents. This product (product name) at use-dilution is non-corrosive to inanimate hard surfaces.

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER

KEEP OUT OF REACH OF CHILDREN. CORROSIVE. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin or on clothing. Wear goggles or face shield, rubber gloves, and protective clothing. May be fatal if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse.

(Required for containers 5 gallons or greater)

ENVIRONMENTAL HAZARDS

This pesticide 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.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

PESTICIDE STORAGE - Store in a dry place no lower in temperature than 50°F or higher than 120°F.

(For Industrial, Institutional, Commercial Products)

CONTAINER DISPOSAL – Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.

Triple rinse container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after flow begins to drip. Fill 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.

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.