JUN -2 2010

Mr. Thomas W. Isaac Senior Regulatory Specialist Stepan Company 22 W. Frontage Rd. Northfield, Illinois 60093

Subject:

50% BTC 1010 Water Treatment Microbicide

EPA Registration Number 1839-151 Application Dated March 9, 2010 EPA Received 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 with comments.

Proposed Amendment:

Revised label and Container Disposal Statements per PR notice 2007-4

Labeling:

- 1. Revise the Precautionary Statements to include the following: "...and skin burns. May be fatal if swallowed or inhaled. Harmful if absorbed through the skin. Do not get in eyes or on clothing. Do not breathe vapor or spray mist....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 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." CONCURRENCES								
SYMBOL								
SURNAME	***************************************							
DATE								
OFFICIAL FILE COPY								

EPA Form 1320-1A (1/90)

Printed on Recycled Paper

OFFICIAL FILE COP

The current rinsing instructions are incorrect for containers greater than 5 gallons. Delete the current rinsing instructions and add the following text 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 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."

4. Revise page 2, Under "RECIRCULATIONG COOLING TOWERS" sections to include mandatory language as per PR Notice 2000-5 as follows: "Periodic Dose" (8 to 12 ppm active quaternary) every 7 days or sooner "must" visible growth appear. This debris "must" be removed....

General Comments:

A stamped copy of the acceptable 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 or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510P)

Enclosure: stamped label

50% BTC® 1010 WATER TREATMENT MICROBIOCIDE

Water Treatment Microbiocide for Building and Industrial Cooling Towers, Oil Field Water Flood or Salt Water Disposal Systems, Oil Drilling Muds/Packer Fluids, Gas/Oil Recovery Injection Water Systems, Gas/Oil Fracturing Fluid Systems and Gas/Oil Pipeline/System Maintenance

ACTIVE INGREDIENT

Didecyl dimethyl ammonium chloride	50.0%
INERT INGREDIENTS	<u>50.0%</u>
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 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.

ACCEPTED with COMMENTS in EPA Letter Dated:

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

1839-151

EPA Reg. No. 1839-151 EPA Est. No. 1839-IL-01

STEPAN COMPANY

22 West Frontage Road Northfield, IL 60093

NET CONTENTS

DIRECTIONS FOR USE

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

50% BTC® 1010 Water Treatment Microbiocide is designed to control algae and bacterial slimes in recirculating cooling towers, oil field water flood, salt water disposal systems, oil drilling muds/packer fluids, gas/oil recovery injection water systems, gas/oil fracturing fluid systems and gas/oil pipeline/system maintenance.

RECIRCULATING COOLING TOWERS

Initial Dose: add 6 ounces 50% BTC® 1010 per 1000 gallons of water contained in the system to provide a concentration of 23.5 ppm active quaternary. Repeat every 7 days or sooner should visible growth appear.

Periodic Dose: add 2 to 3 ounces of this product per 1000 gallons of water contained in the system (8 to 12 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. Apply this product at a point in the system where uniform mixing will take place.

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 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 is used as directed, it will aid in controlling and/or preventing the development of unsanitary slime conditions that are unsightly, produce foul odors, and which are often the cause of equipment breakdown. This product is compatible with virtually all corrosion inhibition additives, but should not be used in the presence of soap or other anionic detergents. This product at use dilution (8 to 12 ppm active quaternary) is non-corrosive to inanimate hard surfaces.

OIL FIELD WATER FLOOD OR SALT WATER DISPOSAL

(Do not apply in Marine and Estuarine Oil Fields.)

To control slime forming and sulfate reducing bacteria (Desulfovibrio desulfricans) (this product or product name) must be added to a water flood system at a point of uniform mixing.

Initial Treatment: When the system is noticeably contaminated, add 50-750 ppm of (this product or product name) (25-375 ppm active quaternary) (6.5-96 ounces per 1000 gallons of flood water). Repeat until control is achieved.

Continuous Dose: Add (6.5-96 ounces per 1000 gallons of water) (4.75-71 gallons per 3000 barrels of water) (25-375 ppm active quaternary). Levels for effective control will vary depending on conditions at the site.

Intermittent Dose: Add 100-750 ppm of (this product or product name) (13-96 ounces per 1000 gallons of water) (9.5-71 gallons per 3000 barrels of water) (50-375 ppm active quaternary) for 4-8 hours per day, 1-4 times per week as needed to maintain control.

Add this product directly from the drum with the proper type of metering equipment.

DRILLING, COMPLETION, FRACTURING AND WORKOVER FLUIDS

To control slime forming and sulfate reducing bacteria (Desulfovibrio desulfricans), (this product or product name) should be added to a drilling fluid system at a point of uniform mixing such as the recirculating mud tank.

Initial Treatment: Add 150-750 ppm of (this product or product name) (19.25-96 ogunces per 4000 gallons of fluid) (14.25-71 gallons per 3000 barrels of fluid) (75-375 ppm active quaternary) to ลู freshly produced fluid dependent on the severity of the contamination.

Maintenance Dose: Maintain a concentration of 150-750 ppm of (this product or product name) by adding (19.25-96 ounces per 1000 gallons of fluid) (14.25-71 gallons per 3000 bariels of fluid) (75-375 ppm active quaternary) to freshly produced fluid, or as needed, depending of the severity of contamination.

Amend 03/09/10

GAS/OIL RECOVERY INJECTION WATER SYSTEMS

To control slime forming and sulfate reducing bacteria (Desulfovibrio desulfricans) (this product or product name) must be added to an injection water system at a point of uniform mixing.

Initial Treatment: When the system is noticeably contaminated, add 50-750 ppm of (this product or product name) (25-375 ppm active quaternary) (6.5-96 ounces per 1000 gallons of flood water). Repeat until control is achieved.

Continuous Dose: Add (6.5-96 ounces per 1000 gallons of water) (4.75-71 gallons per 3000 barrels of water) (25-375 ppm active quaternary). Levels for effective control will vary depending on conditions at the site.

Intermittent Dose: Add 100-750 ppm of (this product or product name) (13-96 ounces per 1000 gallons of water) (9.5-71 gallons per 3000 barrels of water) (50-375 ppm active quaternary) for 4-8 hours per day, 1-4 times per week as needed to maintain control.

Add this product directly from the drum with the proper type of metering equipment.

PACKER FLUIDS

(This product or product name) must be added to a packer fluid at a point of uniform mixing like the recirculating holding tank. Add 150-750 ppm of (this product or product name) by adding (19.25-96 ounces per 1000 gallons of fluid) (14.25-71 gallons per 3000 barrels of fluid) (75-375 ppm active quaternary) to freshly produced fluid depending on the severity of contamination. Seal the packer fluid in the wall between the casing and the production tube.

GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS

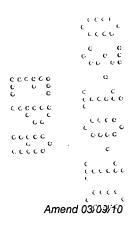
(This product or product name) must be added at 6.5-96 ounces per 1000 gallons of water (25-375 ppm active quaternary) via direct injection to a gas production or transmission pipeline to maintain 50-750 ppm of product. The application should be conducted to ensure maximum distribution of (this product or product name) through the entire internal surface of the pipeline. To facilitate application, it may be desirable to dilute (this product or product name) with an appropriate solvent immediately before use. Injections must be done on a weekly basis at a minimum, or more frequently as needed to maintain control.

GAS STORAGE WELLS AND SYSTEMS

Individual injection wells must be treated with a sufficient quantity of (this product or product name) by adding 57.5-173 ounces per 1000 gallons of water (225-675 ppm active quaternary) to produce a concentration of 450-1350 ppm of product when diluted by the water present in the formation.

PIPELINE PIGGING AND SCRAPING OPERATIONS

Add (this product or product name) to a slug of water immediately following the scraper (ideally this water volume can be kept to a minimum and contained between the scraper and the trailing pig). Sufficient (product or trade name) should be added to produce a concentration of 0.1–3% (0.1-3 gallons per 100 gallons of water) depending on the length of pipe and the severity of bio-fouling.



Stepan Company Northfield, IL 60093 1839-151

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

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

ENVIRONMENTAL HAZARDS

(Required for containers 5 gallons or greater)

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.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

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 1/4 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.

> C C C C C C C 00000 ¢ ζισοῦσ , , , , , ,

was the

Amend 03/09/10