

UNITED STAFFIN FINANCE PROFISE PROFIS

JUN 17 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Christina M. Swick, Lewis & Harrison Consultants Agent for Troy Chemical Company, Ltd. 122 C Street, N.W., Suite 740 Washington, DC 20001

Subject:

Label Amendment

Mergal BCM

EPA Registration No. 365-80 Application Dated May 21, 2002

Dear Ms. Swick:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comment.

Proposed Amendment

- Revised label per PR Notice 2001-1
- Add optional phrase "Made in Germany"

Label Comments

1. Add the word "Pesticide" before the word Storage in the Storage and Disposal Section.

General Comments

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed label before you release the product for shipment bearing the amended label.

CONCURRENCES									
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Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,

Adam Heyward

Product Manager 34

Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure

CONCURRENCES										
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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION - CUIDADO

Causes moderate eye irritation. Avoid contact with eyes, skin and clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

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. STORAGE: Store unused product in original container only in a cool, dry area out of the reach of children or animals. PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of at an approved waste disposal facility, CONTAINER DISPOSAL: Triple rinse (or equivalent) then dispose of in a sanitary landfill or by other approved state and local procedures.

EPA REG. NO. 365-80 EPA EST. NO. 264-DEU-003

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MERGAL® BCM

Industrial Microbiocide For Use In Paints, Coatings, Plasters, Stuccos, Sealants, Caulks, Fillers, Architectural Products, Finishes And Special Purpose Coatings

 ACTIVE INGREDIENT
 99.00%

 Methyl (1H-benzimidazol-2-yl) carbamate
 99.00%

 INERT INGREDIENTS
 1.00%

 TOTAL
 100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION — CUIDADO

Precaucion al usuario. Si Vd. no lee ingles no use este producto hasta que la etiqueta haya sido explicado completemente.

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 eye. 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 ON SKIN: 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.

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

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. See side panel for additional Precautionary Statements.



Manufactured by
TROY CHEMICAL COMPANY, LTD.
Scarboro, Ontario M1E2W5
CANADA

(MADE IN GERMANY)

DIRECTIONS FOR USE

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

MERGAL® BCM is an antifungal preservative for the control of fungi growing on paints, coatings, plasters, sealants, and fillers used for architectural products, finishes and special purpose coatings which are exposed to warm, moist and humid conditions favoring microbial growth.

Typically MERGAL® BCM should be added at the beginning of the formulation process while mixing of the final product (paint, plaster, etc.) to assure uniform distribution of the MERGAL® BCM.

PAINTS AND COATING MATERIALS AND FINISHES (0.1 \sim 0.5%): Add 1-5 lbs. (0.45 \sim 2.25 kg) of MERGAL® BCM to each 1000 lbs. (453 kg) of paint. Use higher addition rate within the above listed and registered range in warm, moist and humid conditions where microbial growth is favored.

PLASTERS, STUCCOS AND SPECIAL PURPOSE COATINGS (0.02 – 1.0%): Add 0.2-10 lbs. (0.09 – 4.5 kg) of MERGAL® BCM to each 1000 lbs. (453 kg) of plasters. Use higher addition rate within the above listed and registered range in warm, moist and humid conditions where microbial growth is favored.

SEALANTS, ČAULKS, FILLERS, AND ARCHITECTURAL PRODUCTS (0.025 - 1.5%): Add 0.25-15 lbs. (0.114-6.8 kg) of MERGAL® BCM to each 1000 lbs. (453 kg) of sealant or filler. Use higher addition rate within the above listed and registered range in warm, moist and humid conditions where microbial growth is favored.

WARRANTY STATEMENT

This label provides information which Seller believes to be reliable based on Seller's present state of knowledge relating to this product and its application. This information is not intended to be a guarantee of specific properties of this product or its suitability for a particular application. Seller warrants that this product conforms to the chemical description on this label. SELLER MAKES NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER WARRANTY EXCEPT AS EXPRESSLY STATED ABOVE. In no event shall Seller be liable for any consequential, special, indirect, or incidental damages relating to the use of this product.

with COMMENTS IN EPA Letter Dated:
JUN 17 2002

Under the Rederal Insecticide,
Flungicide, and Rodenticide Act as
amended, for the pesticide,
amended under EFA Red. No. 365-80