

464-624

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JUN 15 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Rhonda Vance-Moeser
Senior Regulatory Specialist
The Dow Chemical Company
1803 Building
Midland, MI 48674

Subject: **SUMP BUDDY WT™ Antimicrobial Time-Release Tablets**
EPA Registration No. 464-624
Application Date: March 17, 2009
Receipt Date: March 18, 2009

Dear Ms. Vance-Moeser:

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

Proposed Amendment:

- Revised labeling per Agency's letter dated December 12, 2008
- Revised Storage and Handling per PR Notice 2007-4

Reorder the First Aid Statement to read as follows:

IF IN EYES
IF ON SKIN OR CLOTHING
IF SWALLOWED
IF INHALED

General Comment:

A stamped copy of the accepted label with comments has been inserted in your file for future reference. Submit one copy of your final printed label distributing or selling the product bearing the revised labeling.

Should you have any questions concerning this letter, you may contact me by telephone at (703) 308-6415 or by e-mail at lantz.tracy@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by email at grigsby.stacey@epamail.epa.gov during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,
Stacey Grigsby

CONCURRENCE
Tracy Lantz
(Acting) Product Manager (34)
Regulatory Management Branch
Antimicrobials Division (7510P)

SYMBOL						
SURNAME						
DATE	Enclosure: Stamped Label					

SUMP BUDDY WT
FINAL DRAFT LABEL
March, 2009

ACCEPTED
with COMMENTS
EPA Letter Dated:

JUN 15 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **464-624**

Master Label

SUMP BUDDY™ WT Antimicrobial Time-Release Tablets

In Water-Soluble Bags - (option for tablets with water soluble packaging)

For Use Only With Dow Direct Feeder - (option for tablets designed for feeder device)

Controls bacteria, fungi, and algae in industrial cooling water systems and auxiliary water and waste water systems; controls slime-forming bacteria and fungi in industrial air-washer systems.

FOR INDUSTRIAL USE ONLY

Active Ingredient(s):

2,2-Dibromo-3-nitrilopropionamide 40%

Inert Ingredient(s): 60%

Total 100%

E.P.A. Registration No. 464-624

E.P.A. Est. No. XXX-XX-XXX

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

CORROSIVE • Causes irreversible eye damage • May be fatal if swallowed • Causes skin irritation • Harmful if absorbed through skin • Do not get in eyes, on skin, or on clothing • Do not breathe dust • When loading or handling wear protective eyewear (goggles or face shield), wear long-sleeved shirt and long pants, socks, shoes and chemically resistant gloves • Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals • Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco • Remove and wash contaminated clothing separately from other laundry before reuse.

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Personal Protective Equipment

Applicators and other handlers must wear:

- coveralls, over long-sleeved shirt and long pants
- socks and chemical resistance footwear
- goggles or face shields
- chemical-resistant gloves (such as barrier, laminate, butyl nitrile/neoprene rubber, PVC or viton)

User Safety Requirements

Follow manufacturers' instructions for cleaning & maintaining PPE if no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users must wash hands before eating, drinking, chewing gum, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

FIRST AID:	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 30 minutes • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air • If person is not breathing, call an emergency responder or an ambulance, then give artificial respiration, preferably mouth-to-mouth. • Call a poison control center or doctor for further treatment advice
IF SWALLOWED	<ul style="list-style-type: none"> • Call 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 a poison control center or doctor • Do not give anything by mouth to an unconscious person
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • 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

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Have product container or label with you when calling a poison control center or doctor or going for treatment
HOT LINE NUMBER
IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect 989-636-4400
NOTE TO PHYSICIAN
Chemical eye burns may require extended irrigation. Obtain prompt consultation, preferably from an Ophthalmologist. If lavage is performed, suggest endotracheal and/or esophageal control. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach. If burn present, treat as any thermal burn, after decontamination. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Apply this product only as specified on this label. Do not contaminate water by cleaning of equipment, or disposal of wastes. 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: To maintain product quality, store at temperatures below 35C. Keep container tightly closed when not in use.

Note (for tablets without water soluble packaging): Do not remove tablet(s) from container except for immediate use.

Note (for tablets with water soluble packaging): Do not remove tablet(s) from container except for immediate use. When ready to use do not remove tablets from water soluble packaging.

Note (for tablets designed for feeder device): Do not remove tablets from packaging tube prior to use.

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

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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

Nonrefillable container. Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

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

INDUSTRIAL COOLING WATER SYSTEMS

Note (for tablets without water soluble packaging): Direct contact of SUMP BUDDY WT Antimicrobial Time-Release Tablets with a metal surface in the cooling system will cause local corrosion. To prevent corrosion, place a tablet of SUMP BUDDY WT Antimicrobial Time-Release Tablets in the holder provided or equivalent. Suspend/float it in the water so the tablet is completely submerged. Additional holders may be obtained from The Dow Chemical Company. SUMP BUDDY WT Antimicrobial Time-Release Tablets is best used in the basin of the cooling system in an area with little turbulence. Avoid placing SUMP BUDDY WT Antimicrobial Time-Release Tablets in direct sunlight.

Note (for tablets with water-soluble packaging): Tablets wrapped in water soluble packaging are ready for use and should not be removed from protective film. To prevent corrosion, place a tablet of SUMP BUDDY WT Antimicrobial Time-Release Tablets in Water Soluble Bags in the holder provided (or equivalent) and suspend/float it in the water so the tablet is completely submerged. Additional holders may be obtained from The Dow Chemical Company. SUMP BUDDY WT Antimicrobial Time-Release Tablets in Water Soluble Bags is best used in the basin of the cooling water system. Avoid areas of high velocity water flow. Avoid placing SUMP BUDDY WT Antimicrobial Time-Release Tablets in Water Soluble Bags in direct sunlight.

Note (for tablets designed for feeder device): Solid Biocare is intended for use only with the provided feeder from The Dow Chemical Company. To use, open the Solid Biocare packaging tube at one end. Squeeze tube at open end to hold tablets in tube. Invert tube and align open end over empty feeder. Release product from tube to load feeder.

To control bacteria, fungi, and algae in clean to moderately contaminated systems, add one tablet per 500-1,000 gallons of water in the system. Heavily contaminated systems may require two tablets per 500-1,000 gallons of water.

EACH TABLET OR GROUP OF TABLETS OF SUMP BUDDY WT Antimicrobial Time Release Tablets will PROVIDE APPROXIMATELY 3 WEEKS OF CONTROL. Add additional tablet(s) of SUMP BUDDY WT Antimicrobial Time-Release Tablets per 500-1,000 gallons of water in the system every 3 weeks, or as needed to maintain control.

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AUXILIARY WATER AND WASTE WATER SYSTEMS

Note (for tablets without water soluble packaging): Place tablets in holder provided or equivalent. The holders prevent direct contact with metal surfaces and keep tablets near the surface allowing easy observation. Additional holders may be obtained from The Dow Chemical Company.

Note (for tablets with water-soluble packaging): Tablets wrapped in water soluble packaging are ready for use and should not be removed from protective film. Place tablets in holder provided or equivalent. The holders prevent direct contact with metal surfaces and keep tablets near the surface allowing easy observation. Additional holders may be obtained from The Dow Chemical Company.

Note (for tablets designed for feeder device): Solid Biocare is intended for use only with the provided feeder from The Dow Chemical Company. To use, open the Solid Biocare packaging tube at one end. Squeeze tube at open end to hold tablets in tube. Invert tube and align open end over empty feeder. Release product from tube to load feeder.

SUMP BUDDY WT Antimicrobial Time-Release Tablets controls odor-forming and slime-forming bacteria, fungi, and algae in auxiliary water systems such as fire protection systems; pump or screen bays; waste water and waste material disposal; holding or recovery systems such as storage tanks, storage piles, associated piping, settling ponds or lagoons; transport spillways or canals; and disposal wells. SUMP BUDDY WT Antimicrobial Time-Release Tablets should be added to the system at a rate of one tablet per 500-1,000 gallons of water in the system. Each tablet will provide approximately 3 weeks of control per 500-1,000 gallons of water.

INDUSTRIAL AIR-WASHER SYSTEMS

Use only in industrial air-washer systems that maintain effective mist eliminators.

Note (for tablets without water soluble packaging): Prevent direct contact between tablets and metal surfaces by using the holder provided or equivalent.

Note (for tablets with water-soluble packaging): Tablets wrapped in water soluble packaging are ready for use and should not be removed from protective film. Place tablets in holder provided or equivalent. These holders prevent direct contact with metal surfaces and keep tablets near the surface allowing easy observation. Additional holders may be obtained from The Dow Chemical Company.

Note (for tablets designed for feeder device): Solid Biocare is intended for use only with the provided feeder from The Dow Chemical Company. To use, open the Solid Biocare packaging tube at one end. Squeeze tube at open end to hold tablets in tube. Invert tube and align open end over empty feeder. Release product from tube to load feeder.

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For control of slime-forming bacteria and fungi, add one to two tablets per 500 gallons of water in the system, depending on the severity of the contamination. Each tablet or group of tablets will provide approximately 3 weeks of control. Badly fouled systems must be cleaned before treatment is begun.

Notice: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

) Net Wt:

Net Contents:

Lot:

Produced For – *When produced by a contract manufacturer*

Dow Diamond
THE DOW CHEMICAL COMPANY
Midland, Michigan 48674
(989) 636-4400

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