UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

2011

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EPA United States Environmental Protection Office of Pesticide Programs

Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399 MAY 1 8 2011

Attention: Joanne Ryder

707-314

Subject: ROCIMA™ BT 2S

EPA Registration No. 707-314 Amendment Dated March 16, 2011

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

Proposed Amendment

- Revised label in response to BIT RED decision

General Comments

A stamped copy of the "accepted" labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,

Marshall Swindell Product Manager 33 Regulatory Management Branch 1 Antimicrobials Division (7510P)

Enclosure

BT 2S

For Industrial Use only as an antimicrobial to protect aqueous compositions such as latices, oil-in-water emulsions paints and coatings, inks and font solutions, water-based adhesives, aqueous pigment or mineral slurries, building and construction compositions, pesticide formulations, home cleaning products, liquid laundry additives, car care products, oil recovery materials, secondary oil recovery fluids, paper or textile coating compositions, pulp and paper mill systems, or leather processing solutions, or intended to protect fresh animal hides or skins



ACTIVE INGREDIENT: 1,2-Benzisothiazolin-3-one **INERT INGREDIENTS:**

19.0% 81.0% Total: 100%

ACCEPTED with COMMENTS EPA Letter Dated:

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KEEP OUT OF REACH OF CHILDREN the Federal Insecticide, DANGER FIRST AID

Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 707-314

IF IN EYES:	 Hold eye open and rinse slowly and gently with water for 15-20 min. Remove contact lenses, if present, after first 5 min. then continue rinsing eye. Call a poison control center or doctor for treatment advice. 		
IF ON SKIN:	•Take off contaminated clothing.		
	•Rinse skin immediately with plenty of water for 15-20 min.		
	•Call a poison control center or doctor for treatment advice.		
IF INHALED:	•Move person to fresh air.		
	• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to- mouth if possible.		
	•Call a poison control center or doctor for further treatment advice.		
IF SWALLOWED:	•Call a poison control center or doctor immediately for treatment advice.		
	•Do not induce vomiting unless told to do so by a poison control center or doctor.		
	•Have person sip a glass of water if able to swallow. Do not give anything to an unconscious person.		

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

IN CASE OF EMERGENCY CALL ROHM AND HAAS COMPANY 215-592-3000

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsions may be necessary.

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER CORROSIVE CAUSES IRREVERSIBLE EYE DAMAGE CAUSES SKIN BURNS MAY BE FATAL IF INHALED HARMFUL IF SWALLOWED HARMFUL IF ABSORBED THROUGH THE SKIN

Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles or face shield). Wear a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter. When mixing, loading or cleaning equipment wear a chemical-resistant apron.

000707-00314.20110316.JIT RED RESPONSE ROC-BT-2S

Wear coveralls worn over long sleeved shirt and long pants, chemical resistant footwear, socks, and chemical resistant gloves (barrier laminate butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride or viton). User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. User should 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. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this products concentrate. Do not reuse them. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. 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 Systems (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

PESTICIDE STORAGE

Do not contaminate water, food or feed by storage and disposal. Do not apply this product in a way that will contact workers or other persons. Do not allow to freeze.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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

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 procedures approved by state and local authorities.

GENERAL

CONSULT FEDERAL, STATE, OR LOCAL DISPOSAL AUTHORITIES FOR APPROVED ALTERNATIVE PROCEDURES

CONDITIONS OF SALE AND WARRANTY

Rohm and Haas warrants that this product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions and as defined the Directions for Use on this label. ROHM AND HAAS MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES, EITHER OF MERCHANTABILITY OR FITNESS, FOR A PARTICULAR USE. Handling, storage, and use of the product by Buyer or User are beyond the control of Rohm and Haas and Seller. Risks such as ineffectiveness or other unintended consequences resulting from, but not limited to, failure to follow directions will be assumed by the Buyer or User. TO THE EXTENT PERMITTED BY LAW, NEITHER ROHM AND HAAS NOR SELLER SHALL BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT

Date of Manufacture: location for date EPA Reg. No. 707-314 EPA Est. No.

DIRECTIONS FOR USE

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

ROCIMATM BT 2S is an effective preservative in most aqueous compositions. The concentration required to give projection depends on several factors. These include the susceptibility of the system to microbiological degradation, the extent to which micro-organismo can gain access, the species involved, pH, temperature, and length of time for which protection is required. For protection against bacterial attack, a concentration within the range of 0.02-0.25% ROCIMATM BT 2S is almost invariably sufficient. The control of mold growth, particularly on paste products of high solids content, may occasionally require demand dosages above 0.25%. In dilute fluid systems, spoilage is usually controlled with dosages not greater than 0.09%. Do not use at concentration greater than 0.5%.

Typical applications, and the suggested range of concentrations on which trials can be based are:

Refer to the table at the end of this section for recommended dose rates.

Latices, such as: polymer latices based on monomers such as acrylate, butadiene, PVA or styrene; synthetic rubber/latex. Oil-in-water emulsions, such as textile spin-finish solutions, cutting/rolling oils, soluble oils (metal and digineering with the photographic emulsions. Note: limit amount of ROCIMATM BT 2S in metalworking fluid concentrate (to pailing difference) and the possibility of dermal sensitization.

Paints and coatings, such as aqueous coatings, water-based paints, and emulsion paints. Inks and font solutions

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 707-314

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Lbs ROCIMA TM BT 2S To Use Per 1000 LB Of <u>Material To Be Protected</u>

Type of material to be protected

 Latices
 0.5 to 1.5 lb (0.05 - 0.15%)

 Oil-in-water emulsions
 0.5 to 1.8 lb (0.05 - 0.18%)

 Paints and coatings
 0.5 to 2.5 lb (0.05 - 0.25%)

 Inks and font solution
 0.5 to 2.5 lb (0.05 - 0.25%)

Typical applications, and the suggested range of concentrations on which trials can be based are:

Refer to the table at the end of this section for recommended dose rates.

Water-based adhesives, including animal glues, adhesives based on carboxymethylcellulose (CMC) and derivatives, gelatin and/or latex.

Aqueous slurries of pigments, such as titanium dioxide or of minerals such as kaolin, calcium carbonate, calcium sulfate, or magnesium sulfate.

Building and construction compositions, such as tape joint compounds, caulks, and sealants.

Pesticide formulations, including in-can protection and protection of use dilutions

Home cleaning products, including floor waxes and polishes, surface cleaners, window cleaners, and dish detergents. Liquid laundry additives, including laundry detergents, fabric softeners, and stain removers.

Type of material to be protected	Lbs ROCIMA TM BT 2S To Use Per 1000 LB Of <u>Material To Be Protected</u>	ACCEPTED with COMMENTS EPA Letter Dated:
Water-based adhesives Aqueous slurries of pigment	0.5 to 2.5 lb $(0.05 - 0.25\%)$ 0.4 to 1.25 lb $(0.04 - 0.125\%)$ 0.8 to 2.5 lb $(0.08 - 0.25\%)$ 0.5 to 2.5 lb $(0.05 - 0.25\%)$ 0.5 to 1.5 lb $(0.05 - 0.15\%)$ 0.5 to 1.5 lb $(0.05 - 0.15\%)$	MAY 1 8 2011
Building and construction compositions Pesticide formulations Home cleaning products Liquid Laundry additives		inder the Federal Insecticide, ungloide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 707-314

Typical applications, and the suggested range of concentrations on which trials can be based are:

Refer to the table at the end of this section for recommended dose rates.

Car care products, including car washing products, car waxes, and silicone emulsions.

Oil recovery materials, such as drill muds, packer fluids and completion fluids, containing polysaccharide fluid loss control agents and/or thickeners such as starch, guar, or xanthan gum.

Secondary oil recovery injection water containing additives, such as polymer or micellar/polymer waterfloods using thickenere even as xanthan gum and/or polyacrylamides.

Leather processing solutions, to preserve the solutions

Fresh animal skins and hides, to preserve the integrity of hides and skins before or during processing. Add the appropriate quantity of ROCIMATM BT 2S to the brine solution during the curing operation or treat hides or skins with an appropriately diffited aqueous solution during other portions of the processing operation. The specific use rate and contact time needed to control microbial attack will depend on the degree of decomposition of the hides or skins prior to treatment.

Paper coatings and textile coatings, including rosin dispersions, starch and casein based products.

Lbs ROCIMA ™ BT 2S To Use Per 1000 LB Of <u>Material To Be Protected</u>

Type of material to be protected

Car care products Oil recovery materials Secondary oil recovery injection water Leather processing solution Fresh animal skins and hides Paper coatings and textile coatings 0.75 to 1.5 lb (0.075 - 0.15%) 0.5 to 1.5 lb (0.05 - 0.15%) 0.15 to 1.5 lb (0.015 - 0.15%) 0.25 to 2.0 lb (0.025 - 0.20%) 1 to 24 lb (13 fl oz - 2.5 gal) 0.5 to 1.5 lb (0.05 - 0.15%)

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Pulp & paper mill system slime control – The preferred method of addition is by **shock dosing** because this ensures that a high concentration of ROCIMATM BT 2S is present in the system for several hours. If a slime control agent is added by continuous methods over periods of several hours, its concentration in the system at all times is low. This can lead to the development of resistant organisms, which is less likely to occur when the shock dosing method is used.

It is not possible to give precise recommendations as to the quantity of ROCIMATM BT 2S to add to control slime formation, because the magnitude of the problem varies greatly from mill to mill, depending on the furnish employed, the cleanliness of the mill system, and the additional nutrients (for example, starch) that may be added to the stock. The following quantities of ROCIMATM BT 2S are suggested for trial:

Shock dosing: If this preferred method is adopted, add 2.5 to 9 ounces of ROCIMATM BT 2S for each ton of paper produced per day as a single shock dose, the actual quantity to be used depending on the severity of the slime problem. This addition may be made to any part of the stock preparation or backwater system. Alternatively, the addition may be made to those parts of the system where it is known that slime deposits accumulate.

Continuous addition: If this method is adopted, add ROCIMA[™] BT 2S continuously for either the single period of 8 hours during every 24 hours or for two separate periods of 4 hours during every 24 hours. Meter ROCIMA[™] BT 2S into the recirculated backwater at a rate of 7 to 8.5 ounces for each ton of paper produced during the dosing period.

Detergent Concentrates,

ROCIMATM BT 2S should be added to the concentrate at a level to ensure that the final use-dilution of the product will contain 0.05 - 0.15% ROCIMATM BT 2S.

ACCEPTED with COMMENTS EPA Letter Dated:

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