1258-1071 01/15/2009 1/6

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

JAN 15 2009

EPA United States Environmental Protection Agency **Office of Pesticide Programs**

Arch Chemical, Inc.
1955 Lake Park Drive, Suite 100
Smyrna, GA 30080

Attention: Garrett B. Schifilliti
Senior Regulatory Manager

Subject: Triadine 3 Industrial Microbiostat
EPA Registration No. 1258-1071
Your Amendment Dated December 16, 2008

This will acknowledge receipt of your notification of changes to the Storage and Disposal Statements for the "Container Rule", submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification dated December 18, 2008 is in compliance with PR Notice 98-10 and is acceptable. This Notification has been added to your file.

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

Sincerely

M Swindell

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimcrobials Division (7510C)

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*Please read instructions on reverse before completing form.* Form Appro. d. OMB No. 2070-0060, Approval expires 2-28-95

EPA

United States
**Environmental Protection Agency**
Washington, DC 20460

- ☐ Registration
- ☐ Amendment
- ☑ Other

OPP Identifier Number

## Application for Pesticide - Section I

| 1. Company/Product Number | 2. EPA Product Manager | 3. Proposed Classification |
|---|---|---|
| 1258-1071 | Marshall Swindell | ☑ None ☐ Restricted |
| 4. Company/Product (Name) | PM# | |
| Triadine 3 Industrial Microbiostat | | |

5. Name and Address of Applicant *(Include ZIP Code)*

Arch Chemicals, Inc.
1955 Lake Park Drive
Smyrna, GA 30080

☐ *Check if this is a new address*

6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

## Section - II

- ☐ Amendment - Explain below.
- ☐ Resubmission in response to Agency letter dated _____
- ☑ Notification - Explain below.
- ☐ Final printed labels in repsonse to Agency letter dated _____
- ☐ "Me Too" Application.
- ☐ Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

* Notification of changes to Storage & Disposal Statements for the "Container Rule".
* Submittal of Electronic Label.
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

## Section - III

**1. Material This Product Will Be Packaged In:**

| Child-Resistant Packaging | Unit Packaging | Water Soluble Packaging | 2. Type of Container |
|---|---|---|---|
| ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Metal ☐ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____ |
| **** Certification must be submitted*** | If "Yes" Unit Packaging wgt. / No. per container | If "Yes" Package wgt / No. per container | |

| 3. Location of Net Contents Information | 4. Size(s) Retail Container | 5. Location of Label Directions |
|---|---|---|
| ☐ Label ☐ Container | | ☐ |

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☐ Paper glued ☐ Stenciled ☐ Other _____

## Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

| Name | Title | Telephone No. (Include Area Code) |
|---|---|---|
| Garrett B. Schifilliti | Senior Regulatory Manager | (203) 271-4154 |

**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received **(Stamped)**

| 2. Signature | 3. Title | |
|---|---|---|
| Garrett Schifilliti | Senior Regulatory Manager | |
| 4. Typed Name | 5. Date | |
| Garrett B. Schifilliti | 12/16/08 | |

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# TRIADINE® 3 INDUSTRIAL MICROBIOSTAT

ACTIVE INGREDIENT:
Hexahydro-1,3,5-tris (2-hydroxyethyl)-s-triazine...78.5%
Inert Ingredients.....21.5%
Total.....100%

EPA Reg. No. 1258-1071
EPA Est. No. 1258-NY-3

**KEEP OUT OF REACH OF CHILDREN**

## DANGER

SEE FIRST AID & ADDITIONAL PRECAUTIONARY STATEMENTS ON SIDE PANEL

MANUFACTURED FOR:
Arch Chemicals, Inc.
1955 Lake Park Drive
Smyrna, GA 30080

Made in the USA.

TRIADINE® is a registered trademark of Arch Chemicals, Inc.

Net Weight 25 Lbs.

**PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS. DANGER:** Corrosive and alkaline. Causes eye & skin irritation. May cause skin sensitization. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, and rubber gloves when handling. Harmful if swallowed, inhaled or absorbed through the skin.

**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 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 Inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, and 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. 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.

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.

In case of emergency, for additional information call 1-800-654-6911.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, ponds, streams, 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.

**CHEMICAL HAZARDS:** Do not store or mix with strong oxidizing agents or strong (concentrated) acids. In case of contamination, do not reseal container. If possible, isolate container in open air or well-ventilated area. Fumes caused by contamination may be hazardous.

**STORAGE AND DISPOSAL:** This pesticide is a chelating agent and should not be used with other chelating agents or chlorine. Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Do not store above 100 degrees F. (38 deg. C.). Keep container tightly closed when not in use. Do not store with strong oxidizing agents.

**PESTICIDE DISPOSAL:** [For containers > 5 gallons] 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. Triple rinse as follows: Empty 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.

**PESTICIDE DISPOSAL:** [For containers < 5 gallons] 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. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the 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.

**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container 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 its labeling.

**FOR THE IN- CAN PRESERVATION OF LATEX AND OTHER AQUEOUS PAINTS, COATINGS AND EMULSIONS, ADHESIVES, CAULKS, SEALANTS, GROUTS, PATCHING COMPOUNDS, WOOD FILLERS, JOINT COMPOUNDS, GLAZING COMPOUNDS, AND FLOOR PREPARATION PLASTER/CEMENT COMPOUNDS.** Addition of up to 1500 ppm of this product (0.15 lbs. of this product per 100 lbs. of formulation) will inhibit microbial growth (bacteria and fungi) in these products. This product can be added at any time during the formulation procedure.

**FOR THE PRESERVATION OF AQUEOUS ANALYTICAL AND DIAGNOSTIC REAGENTS USED IN CHEMICAL AND CLINICAL ANALYSIS:** Addition of up to 1500 ppm (0.15 lbs.of this product per 100 lbs. of formulation) can inhibit the growth of bacteria and fungi in aqueous analytical and diagnostic reagents. For example, isotonic diluents used in blood diagnostic analyzers can be preserved by addition of 500 ppm of this product (approximately 50 ml of the product into 100 liters of solution, or 6.5 ounces per 100 gallons of solution.). Approval from the FDA must be secured before offering the end product for FDA regulated use.

**TO CONTROL THE GROWTH OF BACTERIA ASSOCIATED WITH FREE AND DISPERSED WATER COMMONLY FOUND IN FUEL SYSTEMS**: Add this product to fuel tanks to control microbial growth in diesel oil, fuel oil, gasoline or kerosene fuel systems. Treatment may be achieved by slug dosing or intermittent metering to provide the proper concentration of this product. If the volume of water is known, add 0.5 – 1.5 gallons of this product to each 1,000 gallons of water to achieve concentrations of 500 to 1,500 ppm in the water-phase. If the volume of water in the system is unknown, add 20 ounces – 1 gallon of this product to each 1,000 gallons of fuel to achieve concentrations ranging between 150 ppm and 1,000 ppm. Concentrations of 150 - 500 ppm of this product are appropriate for preventive treatment. Concentrations of 1,000-1,500 ppm are appropriate for curative treatment. Since microbes tend to grow within biofilm communities, two or more curative treatments introduced at one-two day intervals may be required to treat heavily contaminated fuel tanks successfully. Since this product is not particularly hydrocarbon soluble, there is no adverse effect if some excess accumulates in tank bottoms. It will function as a orrosion inhibitor at higher concentrations.

**TO SCAVENVE HYDROGEN SULFIDE (H2S) FROM AIR STREAMS:** This product effectively scavenges H2S from air streams. This product is not aggressive to the equipment (as a caustic material like NaOH or KOH would be) and is preferred over other amine systems because it regenerates. The reaction of this product with H2S is stochiometric, so the amount of this product required is determined by the level of H2S normally present. Add 6.44 pounds of this product per pound of H2S.

**IN AQUEOUS METALWORKING FLUIDS:** To inhibit the growth of bacteria add this product according to the following directions: Add 0.15% (v/v of this product) to the use dilution (15 gallons per 10,000 gallons of fluid). The fluids may be diluted with from 5-100 parts of water. Contaminated fluid systems should be cleaned prior to the initial addition of this product. Drain the system, clean with a cleaner designed for this purpose, rinse with water and refill with fresh fluid containing this product at the above concentration. Frequent checks (at least once a week) of the bacterial population in the system should be made using standard microbiological plate count procedures or any of the commercial "dip-stick" type devices. When the bacterial count reaches previously established limits for your particular system or fluid, add this product at the initial dose. The fluid should be checked at least once a day with a refractometer (or other suitable means) to determine if water loss by evaporation has occurred. Make-up water should be added daily to compensate for such losses. The fluid should be monitored at least once a week (depending on the metalworking operation involved) for the following: Tramp oil, pH, odor, oil droplet size, and anticorrosion properties. If any of these parameters are outside of the specifications established for the system in question, they should be brought up to the specifications by the addition of suitable additives or the fluid should be discarded and replaced after cleaning the system. Add this product to the fresh fluid according to the above directions.

**TO INHIBIT THE GROWTH OF BACTERIA AND FUNGI IN METALWORKING, CUTTING, COOLING AND LUBRICATING FLUID CONCENTRATES:** Add an amount that will give up to a 2000 ppm solution. The amount required in the concentrate will depend on the end use dilution. To calculate the correct amount of this product to incorporate into the concentrate:
1. Determine the desired dose of this product required for the dilute fluid (i.e., 0.2% or 2000 ppm).
2. Determine end-use concentration of the fluid (i.e., 0.05 or 5%).
Divide the required dose of this product by the end-use concentration of the fluid (i.e., 0.2/0.05 = 4), then 4% (by weight based on total batch weight of coolant concentrate) is the amount of this product to incorporate into the fluid concentrate so that a 5% dilution will contain 2000 ppm of this product.

The following chart describes other dilutions:

| Level of Triadine 3 Desired In End-Use Diluted Fluid | End Use Dilution of Conc. | Amt. Of Triadine 3 to Add to Concentrate |
|---|---|---|
| 2000 ppm | 5% | 4% (40,000ppm) 40 gal./1000 gal.Conc |
| 1500 ppm | 5% | 3% (30,000ppm) 30 gal/1000 gal Conc. |
| 1000 ppm | 5% | 2% (20,000ppm) 20 gal/1000 gal conc. |
| 2000 ppm | 4% | 5% (50,000ppm) 50 gal/1000 gal.conc. |
| 1500 | 4% | 3.75% (37500ppm) 37.5gal/1000 gal conc. |
| 1000 | 4% | 2.5% (25,000ppm) 25 gal/1000 gal conc |