

1258-1205

2-19-2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 19 2002

Garrett Schifilliti
Arch Chemicals, Inc.
501 Merritt 7
P.O. Box 5204
Norwalk, CT 06856

Subject: Triadine 20 Industrial Microbiostat
EPA Reg. No. 1258-1205
Your Amendment Dated 10/17/2001, and Re-submission Dated 2/13/2002

The amendment and re-submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to provide a revised Confidential Statement of Formula (CSF) with slightly increased percent active ingredients, and a revised label with these increased percentages, are acceptable with these comments:

1. The use directions for metal cutting fluid concentrates must be clarified. For example, it's not clear why the product is added directly to the fluid concentrate, and not to the end use fluid after you add the concentrate (then it's one simple v/v dilution)? Also, instructions for creating an end use fluid from the concentrate, irregardless of the pesticide, should be added. The last sentence needs more clarity: "If the end use desired level of this product is 2000 ppm, and the end use dilution of the fluid is 5%, then a 4% concentration of this product is required in the concentrate ($2000 \text{ ppm} / 0.05 = 40,000 \text{ ppm}$ or 4%)." It is hard to understand as stated. It might be easier if it uses an example with logical steps to the end result (ie., step #1 - determine desired end use ppm, step #2 - add X amount of product to concentrate, step #3 - take a portion of concentrate and mix with end use fluid (or add product to prepared end use fluid), etc.

2. The revised basic CSF dated 2/13/2002 is acceptable and agrees with the label. This CSF supercedes all prior CSF's. A stamped copy of the accepted revised label with slightly increased active ingredient percentages, is attached for your records. This label supercedes all prior labels.

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,



Marshall Swindell,
Product Manager Team 33,
Regulatory Management Branch I
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

PRECAUTIONARY STATEMENTS:**HAZARDS TO HUMANS AND DOMESTIC**

ANIMALS. DANGER: Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on skin, or on clothing. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

PERSONAL PROTECTIVE**EQUIPMENT(PPE):**

Applicators and other handlers must wear: long sleeved shirt and long pants, socks and shoes, chemical-resistant gloves (such as rubber or waterproof gloves), goggles and face shield.

USER SAFETY REQUIREMENTS: Follow manufacturer's 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. Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing.

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 public 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 our State Water Board or Regional Office of the EPA

TRIADINE® 20

INDUSTRIAL MICROBIOSTAT

Active Ingredients:

Sodium 2-pyridinethiol-1-oxide	3.69%
Hexahydro-1,3,5-tris	
(2-hydroxyethyl)-s-triazine	71.4%
Inert Ingredients	24.91%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN
DANGER
**SEE SIDE PANEL FOR FIRST AID & ADDITIONAL
PRECAUTIONS**
Net Wt 25 Lbs.
**ARCH CHEMICALS, INC.
501 MERRITT SEVEN
NORWALK, CT 06856**
**EPA Reg. No. 1258-1205
EPA Est. No. 1258-NY-3**
**Triadine® is a registered trademark of Arch
Chemicals, Inc.**

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. 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 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 by a poison control center or doctor. Avoid alcohol. 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 mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

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

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.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

FEB 19 2002

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

1258-1205

DIRECTIONS FOR USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons.

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 and 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 or strong (concentrated) acids.

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.

CONTAINER DISPOSAL: Do not reuse empty container. Triple rinse container. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

TO INHIBIT THE GROWTH OF BACTERIA AND FUNGI IN AQUEOUS METALWORKING, CUTTING, COOLING AND LUBRICATING

FLUIDS: Add up to 2000 ppm (0.2% v/v) of this product to the solution (20 gallons per 10,000 gallons) by pouring from container as needed. When adding fresh, diluted fluid to compensate for dragout or other losses, add Triadine 20 to the make-up fluid according to the above directions.

Frequent checks (at least once a week) of the bacterial and fungal 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 10^7 and/or the fungal count

reaches 10^4 organisms per ml, add additional Triadine 20 at the initial dosage rate.

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 Triadine 20 to the fresh fluid according to the above directions. 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. The Triadine 20 may be added to the fluid at the time it is prepared (diluted) or to the reservoir (sump) containing the fluid after it is put into use. If it is added to the reservoir, the fluid should be circulated after addition to ensure mixing.

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. For example: If the desired level of this product is 2000 ppm and the end use dilution of the fluid is 5%, then a 4% concentration of this product is required in the concentrate (2000 ppm/0.05=40,000 ppm or 4%).

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