

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1258-1205

3/22/2004

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March 22, 2004

Peni Nicholas
Regulatory Associate
Arch Chemicals, Inc.
501 Merritt 7
PO Box 5204
Norwalk, CT 06856-5204

Subject: Triadine 20 Industrial Microbiostat
EPA Registration No. 1258-1205
Application Date: December 23, 2003
Receipt Date: December 24, 2003

Dear Ms. Nicholas:

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

Revision of First Aid Statement in accordance with PR Notice 2001-1.

Comments

Revise the Ingredient Statement to align the percentage of active and other ingredients by the decimal point.

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-8583.

Sincerely,

Emily H. Mitchell
Acting Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL	7510C	7510C						
SURNAME	E. Brigg	E. Mitchell						
DATE	3/22/04	3/23/04						

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.

ACCEPTED
with COMMENTS
- EPA Letter Dated:

MAR 22 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1258-1205

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.

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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 this product 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 10^6 organisms per ml, add additional product 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 this product 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.

This product 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.

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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:

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