

1448-32

04-06-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

APR - 6 2010

OFFICE OF  
PREVENTION,  
PESTICIDES  
AND TOXIC SUBSTANCE

Carl F. Watson, Ph.D.  
Senior Regulatory Toxicologist  
Buckman Laboratories, Inc.  
1256 N. McLean Blvd.  
Memphis, TN 38108

Subject: WSCP  
EPA Registration No 1448-32  
Application Date: November 19, 2009  
Receipt Date: January 12, 2010

Dear Dr. Watson:

The following amendment, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- Update the FIRST AID chart
- Update the Precautionary Statements language
- Update Storage and Disposal statements to be in compliance with PR Notice 2007-4

**Conditions**

Revise the label as follows:

1. On page 1, the FIRST AID chart needs to be reorganized so that the toxicity category III statements precede the toxicity category IV statements. Reorganize the chart so that the FIRST AID statements are in the following order: "If swallowed", "If in eyes", "If on skin or clothing", and "If inhaled".
2. On page 1, the Precautionary Statements language must be revised to read as follows:  
  
"CAUTION. Causes moderate eye irritation. Harmful if swallowed or absorbed through the skin. Avoid breathing vapors. Avoid contact with skin, eyes or clothing. Wear chemical-resistant eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash clothing before reuse."
3. On pages 4, 5 and 6, revise the subheading "Container Disposal" to read "Container Handling".

4. On pages 4 and 5, delete the third sentence, "Offer for recycling if available", under Container Handling for non-refillable containers with a capacity of 5 gallons or less and greater than 5 gallons because it appears as the last statement in the second paragraph for this section.
5. On page 4, 5, and 6, revise the last statement under Container Handling for all container sizes to read: "Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities." Since your product is packaged in both plastic and metal containers, you must remove the reference to burning as you can not burn metal containers.
6. On page 5 and 6, revise the refillable containers with a capacity of 55 gallons or less and greater than 55 gallons statement section by deleting the last paragraph because it references discharging of rinsate which is this language presented under the Environmental Hazards section.

#### **General Comments**

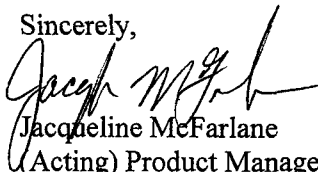
A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Should you have any questions or comments concerning this letter, please contact me by telephone at (703) 308-6416 or email at: [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Heather Garvie by telephone at (703) 308-0034 or email at: [garvie.heather@epa.gov](mailto:garvie.heather@epa.gov)

Sincerely,



Jacqueline McFarlane  
(Acting) Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

# WSCP

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## ACTIVE INGREDIENT(S)

Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene  
dichloride].....

60.0%

INERT INGREDIENTS.....

40.0%

TOTAL.....

100.0%

## KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
If in Eyes	<ul style="list-style-type: none"><li>- Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>- Call a poison control center or doctor for further treatment advice.</li></ul>
If on Skin, Clothes	<ul style="list-style-type: none"><li>- Take off contaminated clothing.</li><li>- Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>- Call a poison control center or doctor for treatment advice.</li></ul>
If Swallowed	<ul style="list-style-type: none"><li>- Call poison control center or doctor immediately for treatment advice.</li><li>- Have person sip a glass of water, if able to swallow.</li><li>- Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>- Do not give anything by mouth to an unconscious person.</li></ul>
If Inhaled	<ul style="list-style-type: none"><li>- Move person to fresh air.</li><li>- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.</li><li>- Call a poison control center or doctor for further treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may also contact 901-767-2722 for emergency medical treatment information.	

## Precautionary Statements

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if swallowed. Avoid breathing vapor. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish, aquatic invertebrates and clams. 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.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

APR - 6 2010

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 1448-32

# WSCP

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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.**

WSCP is a manufacturing use product for formulation of microbiocides for controlling the growth of algae, bacteria, and fungi in recirculating commercial and industrial water cooling towers and recirculating cooling systems; to control algae in swimming pools, exterior spas, whirlpools, hot tubs, decorative fountains and ponds that do not contain fish; to control bacteria in industrial air-washing systems; to control algae, bacteria, fungi, and mollusks in cooling water and industrial process water systems and to inhibit the growth of bacteria that cause degradation of cutting fluids.