

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

JUL 1 1 2011

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Carl F. Watson, Ph.D. Buckman Laboratories, Inc. 1256 North McLean Boulevard Memphis, TN 38108

Subject:

WSCP EPA Registration Number: 1448-32 Application Date: April 12, 2011 Application Receipt: April 12, 2011

Dear Dr. Watson:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

Proposed Amendment

Update Container Handling Instructions per PR Notice 2007-4

Conditions

Revise the label as follows:

- 1.) Revise the second to last statement under the "Precautionary Statements" on page 1 by correcting the spelling of the word, "drkinking," to read "drinking."
- 2.) Revise the "Leaking and Spills" statements under the "Pesticide Storage" for all containers on page 4-6 by deleting the word, "should," and stating "must" such that the sentences comply with PR Notice 2000-5.
- 3.) The "Pesticide Disposal" Statement for containers greater than 5 gallons on pages 4-5 is incorrect. It must read the same as the statement for containers 5 gallons or less by stating "Wastes resulting from use of this product may be disposed of on-site or at an approved waste disposal facility."

General Comments:

	A stampe	d label with c	conditions is e	nclencukkeng	esir records. S	Submit a final	printed label	
зумворе	ore distributii	g or selling t	his product be	aring the rev	sed labeling.			
					*****	*****		********
DATE)								

Should you have questions concerning this letter, please contact me at 703-308-6416 or by email at <u>campbell-mcfarlane.jacqueline@epa.gov</u> or Stacey Grigsby by telephone at 703-305-0181 or by email at <u>grigsby.stacey@epa.gov</u>. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

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

Enclosure: EPA stamped label

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WSCP

ACTIVE INGREDIENT(S)
Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene
dichloride].....
INERT INGREDIENTS......

Buckman

60.0% 40.0% 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID
lf 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 further treatment advice.
lf on Skin, Clothes	 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.
lf Swallowed	 Call 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.
lf Inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
	HOT LINE NUMBER
Have the	product container or label with you when calling a Poison Control Center or doctor or going for treatment

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: 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, drkinking, chewing gum, using tobacco, or using the toilet. Remove and wash clothing before reuse.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish, aquatic organisms 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 EPA Letter Dated:

JUL 1 1 2011

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

1448-32

WSCP

Buckman

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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.



Buckman

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	Storage and Disposal	
See attached d	ocument for Storage and Disposal.	
Manufactured by	Ruckman Laboratorias Inc.	
Manufactured by	Buckman Laboratories, Inc. 1256 North McLean Blvd., Memphis, Tennessee 38108, (901) 278-0330 or 1-800-282-5626	JSA
EPA Est. No.	1256 North McLean Blvd., Memphis, Tennessee 38108, (901) 278-0330 or 1-800-282-5626 1448-TN-1	JSA
EPA Est. No. EPA Reg. No.	1256 North McLean Blvd., Memphis, Tennessee 38108, (901) 278-0330 or 1-800-282-5626 1448-TN-1 1448-32	
EPA Est. No. EPA Reg. No.	1256 North McLean Blvd., Memphis, Tennessee 38108, (901) 278-0330 or 1-800-282-5626 1448-TN-1	

(Nonrefillable Containers, capacity of 5 gallons or less)

Do not contaminate water, food, or feed by storage or disposal. Do not ship with Food, Feed, Drugs, or Clothing.

PESTICIDE STORAGE: Keep container closed when not in use. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the 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 the later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Then offer for recycling if available or reconditioning, if appropriate, or by other procedures if approved by state and local authorities.

(Nonrefillable Containers, capacity of greater than 5 gallons)

Do not contaminate water, food, or feed by storage or disposal. Do not ship with Food, Feed, Drugs, or Clothing.

PESTICIDE STORAGE: Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.

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 HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ 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. Empty the rinsate into

Then offer for recycling if available or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or, by other procedures if approved by state and local authorities.

(Refillable Plastic Containers, capacity of greater than 55 gallons)

Do not contaminate water, food, or feed by storage or disposal. Do not ship with Food, Feed, Drugs, or Clothing.

PESTICIDE STORAGE: Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.

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: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container prior to refilling or disposal, use a pressure wash as follows: Empty the remaining contents into application equipment or a mix tank. Use a pressure wash system that rinses all interior sides with water and that is rated at >40 psi and >120F. Pressure wash the container for a length of time that ensures that a minimum 25% of the container volume of water is used. During the pressure wash, ensure that the container valve is left open for continuous draining. Collect the rinsate and empty into application equipment or a mix tank or store rinsate for later use or disposal. Allow container to drain for 10 minutes after pressure wash is completed. Do not contaminate water, food, or feed by storage or disposal. Do not ship with Food, Feed, Drugs, or Clothing.

PESTICIDE STORAGE: Keep container closed when not in use. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill.

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 HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container prior to refilling or disposal, use a triple rinse wash as follows: Empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously. Pour or pump rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this rinsing procedure two more times.