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

JUN - 1 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Dr. Dennis L. Barbee Buckman, USA 1256 North McLean Blvd. Memphis, Tennessee 28108

Subject: WSCP 10 EPA Registration No.: 1448-60 Application Date: 04/06/2011 Receipt Date: 04/06/2011

Dear Dr. Dennis L. Barbee:

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

Proposed Amendment

• Update of label per PR Notice 2007-4

Conditions

Revise the label as follows:

- 1) Revise the term "drkinking" in the Precautionary Statements to spell out as "drinking."
- 2) Due to the signal word, CAUTION, the first sentence of the pesticide disposal must read "Pesticide wastes may be hazardous."
- 3) As per Mandatory Labeling, PR Notice 2000-5, delete the term "should" in the second or third sentence of the pesticide storage statements and revise the sentence to read:

"In case of spills, use sawdust or sand to absorb the spilled pesticide and dispose of in a sanitary landfill."

General Comments

A stamped label with conditions is enclosed for your records. 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, you may contact me by telephone at (703) 308-6416 or by e-mail at <u>campbell-mcfarlane.jacqueline@epa.gov</u> or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at <u>carl.jaclyn@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, Vacqueline McFarlane

Product Manager (34) Regulatory Management Branch II Antimicrobials Division (7510P) 2

WSCP 10

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

INERT	INGREDIENTS
TOTAL	

10.0% 90.0% 100.0%

This product contains 0.85 lbs of active ingredient per gallon and weighs 8.49 lbs per gallon.

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.
1	HOT LINE NUMBER

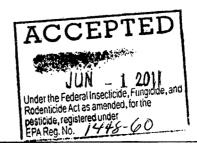
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may also contact 901-767-2722 for emergency medical treatment information.

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Harmful if swallowed. 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.



WSCP 10

Buckman

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

WSCP 10 is used to control the growth of algae in swimming pools and to control algae, bacteria, and fungi in recirculating commercial and industrial water cooling towers and recirculating cooling systems.

WATER COOLING TOWERS: Prior to the use of WSCP 10 in water cooling towers, clean the systems to remove algal growth, microbiological slime, and other deposits. Then make an initial slug addition of 6.13 to 15.32 fluid ounces of WSCP 10 per 1000 gallons of water to provide 48 to 120 ppm WSCP 10, based on the total weight of water in the system. Repeat initial dosage until control is evident. Make subsequent slug additions of 1.53 to 15.32 fluid ounces of WSCP 10 per 1000 gallons of water (12 to 120 ppm WSCP 10) every 2 to 5 days or as needed. The frequency of addition depends upon the relative amount of bleedoff and the severity of the microbiological problem. Make slug additions in the sump of water cooling towers.

SWIMMING POOLS: For maximum effectiveness of WSCP 10 in swimming pools, clean those pools with heavy growths of algae prior to using WSCP 10. For pools having just visible algae growth, add an initial dose of 75 to 115 fluid ounces of WSCP 10 per 10,000 gal. of water and remove settled algae debris by cleaning. For treatment of a freshly cleaned and filled pool, add initially 41 to 75 fluid ounces of WSCP 10 per 10,000 gal. of water. To maintain pools free of visible algae growth, make subsequent additions of 13.5 to 27 fluid ounces of WSCP 10 per 10,000 gal of water every 5 to 7 days after the initial treatment. Uniform distribution of WSCP 10 throughout the water in the pool is necessary for maximum effectiveness.

WSCP 10 is compatible with those chemicals normally used to treat pools and is effective at both acid and alkaline pH. WSCP 10 can be used in pools treated with chlorine chemicals and may reduce the amount of those chemicals normally required. However, do not mix WSCP 10 with concentrated dry or liquid chlorine products.

INDUSTRIAL AIR WASHING SYSTEMS: WSCP 10 is used to control bacteria in industrial air washing systems that maintain effective mist eliminating components. Prior to its use, clean the systems to remove bacterial slime and other deposits. Make an initial slug dose of 24.7 to 41.2 fluid ounces of WSCP 10 per 1000 gallons of water. Repeat initial dosage until control is evident. Make subsequent slug additions of 16.9 to 41.2 fluid ounces of WSCP 10 per 1000 gallons of addition depends upon the relative amount of bleedoff and severity of the bacterial problem. Make slug additions into the sump or into the water collection trays of the airwash system.





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Storage and Disposal						
See attached doci						
Manufactured by	Buckman Laboratories, Inc.					
-	1256 North McLean Blvd., Memphis, Tennessee 38108, USA					
	901) 278-0330 or 1-800-282-5626					
EPA Est. No. 1	448-TN-1					
EPA Reg. No. 1	448-60					
Product Weight {	3.5 lbs/gal. 1.02 kg/l Net contents are marked on the container.	ا				
HMIS / NPCA Ratings Last						
Health 1 Flamma	Revision					
		3/24/2011				

(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 ¹/₄ 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.

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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.

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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. application equipment or a mix tank or store rinsate for later use of disposal. Repeat this procedure two more times.

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