

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 22, 2003

Dennis L. Barbee, Ph.D.
Director, Regulatory Affairs
Buckman Laboratories, Inc.
1256 North McLean Blvd.
Memphis, TN 38108

Subject: WSCP 15
EPA Registration No. 1448-61
Application Date: November 25, 2002
EPA Received Date: November 29, 2002

Dear Dr. Barbee:

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

Proposed Amendment

- Update First Aid Statement per PR Notice 2001-1

Conditions

Revise the label as follows:

1. Separate the Precautionary Statement heading from the First Aid Statements. In addition, the precautionary heading and its statement must be grouped together to read as follows:

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

2. The child signal word "Caution" and the "Keep Out of Reach of Children" statement must be placed under the ingredient statement

SYMBOL	75710						
SURNAME	Barbee						
DATE	1/22/03						

Other Comments

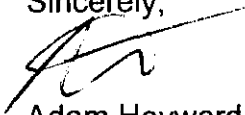
Please explain why this product label does not contain a re-entry interval time following the application of this product in swimming pools.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one(1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)



WSCP 15

KEEP OUT OF REACH OF CHILDREN

CAUTION

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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 eye. - Call a poison control center or doctor for further treatment advice.
If on Skin, Clothes	- Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes. - Call a poison control center for treatment advice.
If Ingested	- 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.
If 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. You may also contact 901-278-0330 or 1-800-BUCKMAN for emergency medical treatment information.

CAUTION: Harmful if swallowed. Avoid breathing vapors, Avoid contact with skin, eyes, or clothing.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Keep out of lakes, streams, or ponds. 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.

ACTIVE INGREDIENTS:

Poly[oxyethylene(dimethyliminio)ethylene]..... 15.0 %
(dimethyliminio)ethylene dichloride

INERT INGREDIENTS: 85.0 %

TOTAL.....100.0%

This product contains 1.28 lbs of active ingredient per gallon and weighs 8.58 lbs per gallon.

Storage and Disposal

Do not contaminate water, food, or feed by storage, disposal, or cleaning of equipment.
PESTICIDE STORAGE: Do not stack more than four drums high. Leaking or damaged drums should be placed in cormpack 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:

PLASTIC: Triple rinsed (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

METAL: Triple rinsed (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Manufactured by

Buckman Laboratories, Inc.

1255 North McLean Blvd., Memphis, Tennessee 38108, USA
(901) 278-4330 or 1-800-BUCKMAN

EPA Est. No. 1448-TN-1

EPA Reg. No. 1448-61

Product Weight 8.6 lbs/gal. 1.03 kg/l

Net contents are marked on the container.

HMS / NPCA Ratings

Health 1 Flammability 1 Reactivity 1

Last Revision

8/29/2002

Directions for Use

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

WSCP 15 is used to control the growth of algae in swimming pools and to control industrial water cooling towers.

COOLING TOWERS Prior to the use of WSCP 15 in water cooling towers, systems, slimes, and other deposits. Then make an initial slug addition of 4.0 to 10.0 fluid ounces of WSCP 15, based on the total weight of water in the system. Repeat initial dose of 1.0 to 10.0 fluid ounces of WSCP 15 per 1000 gallons of water (8 to 80 ppm WSCP 15). Addition depends upon the relative amount of bleedoff and the severity of the microorganisms in the water cooling towers.

SWIMMING POOLS For maximum effectiveness of WSCP 15 in swimming pools, clean swimming pools before using WSCP 15. For pools having just visible algae growth, add an initial dose of 5.0 fluid ounces of WSCP 15 per 1000 gal. of water. To maintain pools free of visible algae growth, subsequent additions should be made every 5 to 7 days after the initial treatment. Uniform distribution of WSCP 15 throughout the water in the pool is necessary for maximum effectiveness. WSCP 15 is effective at both acid and alkaline pH levels. Chlorine chemicals normally used to treat pools and is effective at both acid and alkaline pH levels. Chlorine chemicals and may reduce the amount of those chemicals normally required. Do not use chlorine products.

INDUSTRIAL AIR WASHING SYSTEMS WSCP 15 is used to control bacteria and mold in air wash systems. Prior to its use, systems should be cleaned to remove bacteria and mold. A dose of 24.7 fluid ounces of WSCP 15 per 1000 gallons of water is recommended. Repeat additions of 10.1 to 24.7 fluid ounces of WSCP 15 per 1000 gallons of water should be made every 5 to 7 days after the initial treatment. Addition depends upon the relative amount of bleedoff and severity of the bacteria and mold in the water collection trays of the airwash system.

ACCEPTED
with COMMENT
EPA Letter Date

JAN 22 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, amended, for the pesticide, registered under EPA Reg. M