

1448-61

4/8/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

APR - 8 2010

OFFICE OF
PREVENTION, PESTICIDE
AND TOXIC SUBSTANCE

Carl F. Watson
Buckman Laboratories, Inc.
1256 N. McLean Blvd
Memphis, TN 38108

Subject: **WSCP 15**
EPA Registration No. 1448-61
Application Date: November 19, 2009
Receipt Date: January 12, 2010

Dear Mr. Watson:

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

Proposed Amendment:

- Update label as PR Notice 2007-4
- Update Precautionary Statements Language
- Update Directions for Use
- Update First Aid Statement

Conditions

Revise the label as follows:

1. According to PRN 2001-1, First Aid Statements must be organized so that the most severe routes of exposure, as demonstrated by the toxicity classification, are listed first. Therefore reorder the First Aid Statement as follows:

1. If swallowed
2. If in eyes
3. If on skin or clothing
4. If inhaled

2. The "Precautionary Statements" like the "First Aid" Statement must be organized by the most severe routes of exposure. Therefore revise this section to read:

Causes moderate eye irritation. Avoid contact with eyes or clothing. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear [specify protective eyewear, if appropriate]. Harmful if inhaled. Avoid breathing vapor. Remove and wash contaminated clothing before reuse. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing.

CONCURRENCES

| | | | | | |
|---------|--|--|--|--|--|
| 3 | Revise the subheading "Container Disposal" to read "Container Handling" such that it is in agreement with section V of Chapter 13 of the Manual Review | | | | |
| SYMBOL | | | | | |
| SURNAME | | | | | |
| DATE | | | | | |

2018

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

- 4. On page 5 of your label, under subheading "Container Handling" delete the second instruction referencing that cleaning is the responsibility of the refiller as it is a repetitive statement.
- 5. PRN 2005-1, Guidance for Mandatory and Advisory Labeling Statements, states that:
 - Mandatory statements**, which commonly use imperative verbs such as "must" or "shall," either require action or prohibit the user from taking certain action.
 - Advisory statements** generally provide information, either in support of the mandatory statements or about the product in general. **To ensure that the intent of each labeling statement is clear, mandatory statements need to be clearly distinguishable from advisory statements.**

Therefore, you must change the "Recommendation" to "Requirements" under the Directions for Use heading on page 2 of your label.
- 6. On pages 4 and 5 delete the third sentence under Container Handling for non-refillable containers with a capacity of 5 gallons or less and greater than 5 gallons: "Offer for recycling if available."
- 7. On pages 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.
- 8. On page 5 and 6, revise the refillable containers with a capacity of 55 gallons or less and greater than 55 gallons by deleting the last paragraph because it references discharging of rinsate which is this language presented under the Environmental Hazards section.

General Comment:

A stamped label with conditions is enclosed for your records. Submit a copy 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 campbell.mcfarlane.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at grigsby.stacey@epa.gov during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



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

Enclosure: EPA stamped accepted labeling

CONCURRENCES

| SYMBOL | SURNAME | DATE |
|--------|---------|------|
| | | |
| | | |
| | | |
| | | |

WSCP 15

3048

Buckman

ACTIVE INGREDIENT(S)

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

15.0%

INERT INGREDIENTS.....

85.0%

TOTAL.....

100.0%

This product contains 1.29 lbs of active ingredient per gallon and weighs 8.56 lbs per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

| 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 or doctor for treatment advice. |
| If 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. |
| 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 901-767-2722 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 - 8 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1448-61

WSCP 15

4098
Buckman

Directions for Use

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

WSCP 15 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 15 in water cooling towers, clean the systems to remove algal growth, microbiological slime, and other deposits. Then make an initial slug addition of 4.0 to 10.0 fluid ounces of WSCP 15 per 1000 gallons of water to provide 32 to 80 ppm WSCP 15, based on the total weight of water in the system. Repeat initial dosage until control is evident. Make subsequent slug additions of 1.0 to 10.0 fluid ounces of WSCP 15 per 1000 gallons of water (8 to 80 ppm WSCP 15) 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 15 in swimming pools, clean those pools with heavy growths of algae prior to using WSCP 15. For pools having just visible algae growth, add an initial dose of 50 to 77 fluid ounces of WSCP 15 per 10,000 gal. of water and remove settled algae debris by cleaning. For treatment of a freshly cleaned and filled pool, add initially 27 to 50 fluid ounces of WSCP 15 per 10,000 gal. of water. To maintain pools free of visible algae growth, make subsequent additions of 9 to 18 fluid ounces of WSCP 15 per 10,000 gal of water 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 compatible with those chemicals normally used to treat pools and is effective at both acid and alkaline pH. WSCP 15 can be used in pools treated with chlorine chemicals and may reduce the amount of those chemicals normally required. However, do not mix WSCP 15 with concentrated dry or liquid chlorine products.

INDUSTRIAL AIR WASHING SYSTEMS: WSCP 15 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. An initial slug dose of 14.8 to 24.7 fluid ounces of WSCP 15 per 1000 gallons of water is recommended. Repeat initial dosage until control is evident. Make subsequent slug additions of 10.1 to 24.7 fluid ounces of WSCP 15 per 1000 gallons of water each 1 to 5 days, or as needed. The frequency 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.

WSCP 15

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Storage and Disposal

See attached document

Manufactured by Buckman Laboratories, Inc.
1256 North McLean Blvd., Memphis, Tennessee 38108, USA
(901) 278-0330 or 1-800-282-5626

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.

HMIS / NPCA Ratings

Health 1 Flammability 1 Reactivity 0

Last
Revision
3/18/2010

6048

(Non-refillable Containers, capacity of 5 gallons or less)

STORAGE AND DISPOSAL

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 DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. 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 $\frac{1}{4}$ 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 puncture and dispose of in a sanitary landfill, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

(Nonrefillable Containers, capacity of greater than 5 gallons)

STORAGE AND DISPOSAL

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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. 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 application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Then offer for recycling if available or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

(Refillable Containers, capacity of 55 gallons or less)

STORAGE AND DISPOSAL

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 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.

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.

Do not discharge rinsate containing this product 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 rinsate containing this product to sewer systems without prior approval from the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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

STORAGE AND DISPOSAL

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 discharge rinsate containing this product 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 rinsate containing this product to sewer systems without prior approval from the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.