-4 MAY 894

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

Attn: Dennis L. Barbee

Subject: WSCP 20

EPA Registration No. 1448-62

Your Resubmission of February 18, 1994

The submission noted above, a revised product label forwarded in response to EPA's rejection letter of August 11, 1993, has been reviewed. Please note the following.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy is enclosed for your records. Five copies of the final printed labeling must be submitted before releasing the product for shipment.

- 1. Re-revise the Environmental Hazards statement as per PR Notice 93-10, published July 29, 1993: "This product is toxic to fish and aquatic organisms. Do not contaminate water by the cleaning of equipment or disposal of wastes. 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 Pollution Discharge Elimination (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."
- 2. The re-revision of the signal word from "DANGER" back to "CAUTION" is noted and is acceptable.

CONCURRENCES							
SYMBOL 7505C							
SURNAME JAG FERSON							
DATE A MAU ST							
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EPA Form 1320-1A (1/90)

Printed on Recycled Paper

If you should have any questions concerning this letter, you may call Robert Travaglini on (703) 305-6909.

Sincerely,

Ruth G. Douglas Product Manager (32) Antimicrobial Program Branch Registration Division (7505C)

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WSCP 20

KEEP OUT OF REACH OF CHILDREN CAUTION

ACTIVE INGREDIENTS: Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)	
ethylene dichloride	
INERT INGREDIENTS 80.0% TOTAL 100.0%	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

FIRST AID: If Swallowed, drink large quantities of water. Avoid alcohol. Call a physician immediately. If In Eyes: Flush with plenty of water for at least 15 minutes. Consult a physician if irritation occurs. In Case Of Skin Contact: Wash throughly with soap and water. Remove contaminated clothing before reuse. Get medical attention if irritation persist.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Do not discharge into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

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 landfull. 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 rinse (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 rinse (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.

DIRECTIONS FOR USE

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

WSCP 20 is used to control algae, bacteria, and fungl in recirculating commercial and industrial cooling towers and recirculating cooling system. Prior to its use, systems must be cleaned to remove algel growth, microbiological siline, and other deposits. An initial sting addition of 2.9 to 7.3 fluid ounces of WSCP 20 per 1000 gallons of water to provide a concentration of 24 to 60 parts per million of WSCP 20 based on the total weight of water in the system, is recommended. Repeat initial dosage until control is ovideral.

Subsequent stug additions of 0.73 to 7.3 fluid ounces of WSCP 20 per 1000 gettons of water (6 to 60 parts per million of WSCP 20) should be employed every 2 to 5 days, or as needed. The frequency of addition described by the relative amount of

bleedoff and the severity of the microbiological problem. Stup e-f-fittons should be WSCP 20 is used to control bacteria in industrial air-washing systems that maintail to its use, systems should be cleaned to remove becterial slime and other deprounces of WSCP 20 per 1000 gallons of water is recommended. Repeat initial dot additions of 7.5 to 18.3 fluid ounces of WSCP 20 per 1000 gallons of water should. The frequency of addition depends upon the relative amount of bleedoff and sew may be made to the sump or the water collection trays of the airwash systems.

WSCP 20 is used to control the growth of algae in swimming pools, exteriur spes, ponds that do not contain (ish. For maximum effectiveness pools, spes, wniripo containing heavy growth of eigae should be cleaned prior to using WSCP 20. For pools having just visible algae growth and add an additional dose of 37 to 50 of water and remove settled algae debris by cleaning. For treatment of a freshi fluid ounces of WSCP 20 per 10,000 gallons of water. Subsequent additions of gallons of water should be made every 5 to 7 days after initial treatment for ma Spas, whiripools, hot tubs, decorative fountains, and ponds having just visible alg ounces of WSCP 20 per 1000 gallons of water. For treatment of a freshly closing or pond, add initially 2 to 4 fluid ounces of WSCP 20 per 1,000 gallons of water. WSCP 20 should be made every 5 to 7 days after initial treatment for maintains WSCP 20 will preven growth of most algae during the off-season winter months have been properly treated, during the swimming season and are tree of visible per 10,000 gallons of water. If at the end of swimming season pools have some per 10,000 gallons. It is necessary that a uniform distribution of algaedde thro maximum effectiveness. If pool is not covered, it may be necessary to repeat

WSCP 20 is compatible with those chemicals normally used to treat pools and sight. WSCP 20 can be used in pools and spas treated with chlorine chemicals an normally required. However, do not mix WSCP 20 with concentrated dry or liquid.

ADGEPTED

11th COMMENTES

In ETPA Letter Dates

-4 MAT 1994

Under the Federal Insection Function, and Rodenticide Act on inded, for the pestici man and under EPA Reg. 1

14-12-6

HMIS/NPCA RATING
Health 1 Flammability 1 Reactivity 1

Proc

Manufactured By EPA Est. No. 14
BUCKMAN LABORATORIE:
1256 N McLEAN BLVD., MEMPHIS, Tr
(901) 278–0330 or 1–800–BUCK

Rev. 2/18/94