

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

6 MAY 1994

Attn: Dennis L. Barbee

Subject: W-15-1  
EPA Registration No. 1448-211  
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."

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)

CONCURRENCES

SYMBOL	7505C						
SURNAME	<i>R. Travaglini</i>						
DATE	5-6-94						

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# W-15-1

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**ACTIVE INGREDIENTS:**

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

INERT INGREDIENTS ..... 85.0%

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. Do not induce vomiting. Get medical attention 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 thoroughly with soap and water. Remove and wash contaminated clothing before reuse. Get medical attention if irritation occurs.

**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**

**STORAGE:** Do not contaminate water, food or feed by storage or disposal. Keep container closed when not in use. Leaking or damaged containers should be placed in a plastic bag and discarded in trash. Mop up spills with clear water. All pesticides should be kept out of reach of children and stored away from food.

**DISPOSAL:** Do not reuse empty container. Wrap container and place in trash.

**DIRECTIONS FOR USE**

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

W-15-1 is used to control algae, bacteria, and fungi in recirculating commercial and industrial water cooling towers and recirculating cooling systems. Prior to its use, systems must be cleaned to remove algal growth, microbiological slime, and other deposits. An initial slug addition of 4.0 to 10.0 fluid ounces of W-15-1 per 1000 gallons of water to provide a concentration of 32 to 80 parts per million of W-15-1 based on the total weight of water in the system, is recommended. Repeat initial dosage until control is evident.

Subsequent slug additions of 1.0 to 10.0 fluid ounces of W-15-1 per 1000 gallons of water (8 to 80 parts per million of W-15-1) should be employed 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. Slug additions should be made in the sump of water cooling towers.

W-15-1 is used to control bacteria in industrial air-washing systems that maintain effective mist eliminating components. Prior to its use, systems should be cleaned to remove bacterial slime and other deposits. An initial slug dose of 14.8 to 24.7 fluid ounces of W-15-1 per 1000 gallons of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 10.1 to 24.7 fluid ounces of W-15-1 per 1000 gallons of water should be employed 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. Slug additions may be made to the sump or to the water collection trays of the airwash system.

W-15-1 is used to control the growth of algae in swimming pools, exterior spas, whirlpools, hot tubs, and ponds that do not contain fish. For maximum effectiveness pools, spas, whirlpools, hot tubs, and ponds containing heavy growth of algae should be cleaned prior to using W-15-1. For pools having just visible algae growth add an initial dose of 50 to 77 fluid ounces of W-15-1 per 10,000 gallons of water. Subsequent additions of 9 to 18 fluid ounces should be made every 5 to 7 days after initial treatment for maintenance. Spas, whirlpools, hot tubs, decorative fountains, and ponds having just visible algae growth add an initial dose of 3 to 5 fluid ounces of W-15-1 per 1,000 gallons of water. For treatment of a freshly cleaned spa or pond, add initially 3 to 5 fluid ounces of W-15-1 per 1,000 gallons of water. Subsequent additions of W-15-1 should be made every 5 to 7 days after initial treatment for maintenance. W-15-1 will prevent growth of most algae during the off-season winter months when pools have been properly treated during the swimming season and are free of visible algae. If at the end of swimming season pools have some visible algae growth per 10,000 gallons, it is necessary that a uniform distribution of algaecide throughout the pool be made for maximum effectiveness. If pool is not covered, it may be necessary to repeat the treatment. W-15-1 is compatible with those chemicals normally used to treat pools and spas and may be used in pools and spas treated with chlorine chemicals and may reduce the amount of chlorine required. However, do not mix W-15-1 with concentrated dry or liquid chlorine products.

**BEST AVAILABLE COPY**

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

6 MAY 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 1448-211

**HMIS/NPCA RATING**  
Health 1 Flammability 1 Reactivity 1

Product  
NET CO

Manufactured By EPA Est. No. 1448-  
**BUCKMAN LABORATORIES, INC.**  
1256 N. McLEAN BLVD., MEMPHIS, TN 38111  
(901) 278-0330 or 1-800-BUCKMAN