

January 23, 2003

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

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

3. Since this product is used in commercial and industrial use sites, and not solely for household purposes, revise the "Disposal" instructions, per PR Notice 83-3, to read as follows:

CONCURRENCES

SYMBOL	7510C						
SURNAME	Wray						
DATE	1-23-03						

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.

- 4. Revise the statement "For pools having just visible algae growth, add an initial dose of 50 to 7 fluid ounces..." to read "For pools having just visible algae growth, add an initial dose of 50 to 77 fluid ounces..." to agree with the last accepted product label, dated May 6, 1994.
- 5. Revise the statement "...swimming season and are free of visible algae, add 50 to 77 fluid ounces per 10,000 gallons." to read "...swimming season and are free of visible algae, add 27 to 43 fluid ounces per 10,000 gallons." to agree with the last accepted product label, dated May 6, 1994.

Other Comments

Note that if you intend to revise your label rates, you must submit a formal request through a label amendment application.

Please explain why this product label does not contain a re-entry interval time following the application of this product in swimming pools, spas, whirlpools, and hot tubs.

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)



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(dimethylimino)ethylene].....	15.0%
(dimethylimino)ethylene dichloride]	
INERT INGREDIENTS:	85.0%
TOTAL	100.00%

Storage and Disposal

PESTICIDE 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.

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

EPA Est. No.	1448-TN-1	
EPA Reg. No.	1448-211	Net contents are marked on the container.
Product Weight	8.6 lbs/gal. 1.03 kg/l	

HMIS / NPCA Ratings			Last Revision		
Health	1	Flammability	1	Reactivity	1
				9/3/2002	

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with the label directions.

W-15-2 is used to control algae, bacteria, and fungi in recirculating commercial swimming pools, hot tubs, spas, whirlpools, and other enclosed water systems. It must be cleaned to remove algal growth, microbiological slime, and other deposits. Use 1 fluid ounce per 1000 gallons of water to provide a concentration of 32 to 80 parts per million. Repeat initial dosage until control is evident. Subsequent slug additions of 1 to 5 fluid ounces per 1000 gallons of water (8 to 80 parts per million of W-15-2) should be employed every 2 to 5 days, depending on the relative amount of bleedoff and the severity of the microbiological problem. Slug additions may be made to the sump.

W-15-2 is used to control bacteria in industrial air-washing systems that maintain clean surfaces. Surfaces should be cleaned to remove bacterial slime and other deposits. An initial slug addition of 1 to 5 fluid ounces per 1000 gallons of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 1 to 5 fluid ounces per 1000 gallons of water should be employed every 2 to 5 days, or as needed. The frequency and severity of the bacterial problem. Slug additions may be made to the sump.

W-15-2 is used to control the growth of algae in swimming pools, exterior spas, hot tubs, and whirlpools that contain fish. For maximum effectiveness, pools, spas, whirlpools, hot tubs, and whirlpools should be cleaned prior to using W-15-2.

For pools having just visible algae growth, add an initial dose of 50 to 75 fluid ounces per 10,000 gallons of water. For treatment of a freshly cleaned and lined pool, add 10 to 15 fluid ounces per 10,000 gallons of water. Subsequent additions of 9 to 18 fluid ounces of W-15-2 per 10,000 gallons of water should be made for maintenance.

Spas, whirlpools, hot tubs, decorative fountains, and ponds having just visible algae growth should be treated during the swimming season and are free of visible algae, add 50 to 75 fluid ounces per 10,000 gallons of water. Subsequent additions of 1 to 2 fluid ounces per 10,000 gallons of water should be made for maintenance.

W-15-2 will prevent growth of most algae during the off-season winter months. Pools, spas, whirlpools, hot tubs, and decorative fountains treated during the swimming season and are free of visible algae, add 50 to 75 fluid ounces per 10,000 gallons of water throughout the water and the pool be made for maximum effectiveness. Repeat the treatment one or more times during the season.

W-15-2 is compatible with those chemicals normally used to treat pools and spas. Do not use W-15-2 in pools and spas treated with chlorine chemicals and may reduce the amount of chlorine available. Do not use W-15-2 with concentrated dry or liquid chlorine products.

ACCEPTED with COMMENTS - EPA Letter Dated:

JAN 23 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1448-TN-1