

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

6 MAY 1994

Attn: Dennis L. Barbee

Subject: W-15-2
EPA Registration No. 1448-212
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	Travaglini						
DATE	6 MAY 1994						

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W-15-2

**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

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 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 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.

W-15-2 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-15-2 per 1000 gallons of water to provide a concentration of 32 to 80 parts per million of W-15-2 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-15-2 per 1000 gallons of water (8 to 80 parts per million of W-15-2) should be employed every 2 to 5 days, or as needed. The frequency of addition depends on the relative amount of bleedoff

and the severity of the microbiological problem. Slug additions should be made in W-15-2 is used to control bacteria in industrial air-washing systems that maintain air to its use, systems should be cleaned to remove bacterial slime and other deposits. 10.1 to 24.7 fluid ounces of W-15-2 per 1000 gallons of water is recommended. Repeat initial dosage additions of 10.1 to 24.7 fluid ounces of W-15-2 per 1000 gallons of water should be made. The frequency of addition depends upon the relative amount of bleedoff and severity. may be made to the sump or to the water collection trays of the airwash system.

W-15-2 is used to control the growth of algae in swimming pools, exterior spas, whirlpools, and ponds that do not contain fish. For maximum effectiveness pools, spas, whirlpools, and ponds containing heavy growth of algae should be cleaned prior to using W-15-2.

For pools having just visible algae growth add an initial dose of 50 to 77 fluid ounces of W-15-2 per 10,000 gallons of water. For treatment of a freshly cleaned and remove settled algae debris by cleaning. For treatment of a freshly cleaned and of W-15-2 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 of W-15-2 per 1000 gallons of water. For treatment of a freshly cleaned spa or pond, add initially 3 to 5 fluid ounces of W-15-2 per 1,000 gallons of water. Subsequent additions of W-15-2 should be made every 5 to 7 days after initial treatment for maintenance.

W-15-2 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. per 10,000 gallons of water. If at the end of swimming season pools have some visible algae per 10,000 gallons, it is necessary that a uniform distribution of algacide throughout the pool be made for maximum effectiveness. If pool is not covered, it may be necessary to repeat the treatment.

W-15-2 is compatible with those chemicals normally used to treat pools and spas and W-15-2 can be used in pools and spas treated with chlorine chemicals and may reduce the amount of chlorine required. However, do not mix W-15-2 with concentrated dry or liquid chlorine products.

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.
1448-215

HMIS/NPCA RATING
Health 1 Flammability 1 Reactivity 1

Product
NET CO

Manufactured By EPA Est. No. 1448
BUCKMAN LABORATORIES,
1256 N. McLEAN BLVD., MEMPHIS, TN 38103
(901) 278-0330 or 1-800-BUCKMAN