

1448-212

4/26/2012

1009

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 26 2012

Crystal W. Brown  
Regulatory Specialist  
Buckman Laboratories, Inc.  
1256 North McLean Blvd  
Memphis, TN 38108-1241

Subject: W-15-2  
EPA Registration No.: 1448-212  
Notification Date: April 13, 2012  
EPA Receipt Date: April 18, 2012

Dear Ms. Brown,

This letter acknowledges receipt of your notification submitted under the provisions of FIFRA section 3(c)9 and PR Notice 98-10.

**Proposed Notification**

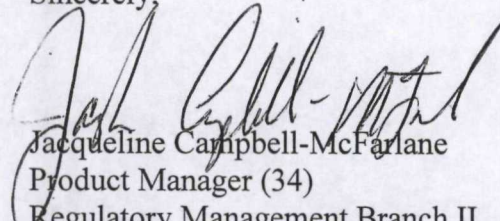
- To add Alternate Brand name: WSCP 1500

**General Comments**

Based on a review of the submitted material, your notification to add alternate brand name, WSCP 1500, is acceptable and apart of the record on file for future reference.

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](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Lorena Rivas by telephone at (703) 305-5027 or by e-mail at [rivas.lorena@epa.gov](mailto:rivas.lorena@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



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

CONCURRENCES

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

20f9

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

Print Form



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Buckman Laboratories, Inc./1448-212	2. EPA Product Manager Jacqueline Campbell-McFarlane	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Buckman Laboratories, Inc./W-15-2	PM# 34	
5. Name and Address of Applicant (Include ZIP Code)  1256 North McLean, Boulevard Memphis, TN 38108  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Alternate Brand Name: WSCP 1500

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.    No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Crystal W. Brown, MS	Title Regulatory Specialist	Telephone No. (Include Area Code) 901.272.8258
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Specialist	
4. Typed Name Crystal W. Brown, MS	5. Date Mar 13, 2012	

14 July 2011

Jacqueline Campbell-McFarlane  
Product Manager 34  
US EPA, Regulatory Management Branch II  
Antimicrobials Division (7510P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

Re: WSCP 1500  
EPA Reg. No. 1448-212  
Alternate Brand Name Notification

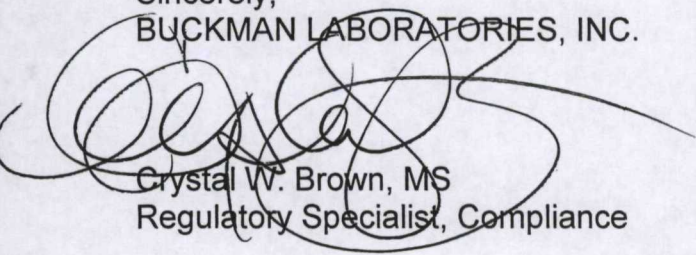
Buckman Laboratories, Inc. requests that the brand name listed below be added to the file for W-15-2 (EPA Reg. No. 1448-212). The labeling for this product shall be identical to that approved for W-15-2, with the exception of brand name. Five (5) copies of the product label and the EPA Form 8570-1 are included.

**Alternate Brand Name: WSCP 1500**

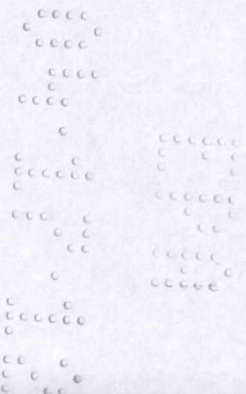
*"This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."*

If you have any questions or require any additional information, please contact me at 901.272.8258 or [cwbrown@buckman.com](mailto:cwbrown@buckman.com)

Sincerely,  
BUCKMAN LABORATORIES, INC.



Crystal W. Brown, MS  
Regulatory Specialist, Compliance



# WSCP 1500

## Buckman

ACTIVE INGREDIENT(S) Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride].....	15.0%
INERT INGREDIENTS.....	85.0%
TOTAL.....	100.0%

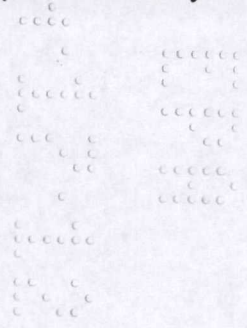
**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

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:** Causes moderate eye irritation. Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes, or clothing. Wear chemical-resistant eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash clothing before reuse.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish, aquatic organisms 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.



# WSCP 1500

## Buckman

### Directions for Use

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

WSCP 1500 is used to control the growth of algae in swimming pools, heated swimming pools, exterior spas, whirlpools, hot tubs and decorative fountains that do not contain fish. It is also used 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 1500 in water cooling towers, clean the systems to remove algal growth, microbiological slime, and other deposits. Then make an initial slug addition of 4 to 10 fluid ounces of WSCP 1500 per 1000 gallons of water to provide 32 to 80 ppm WSCP 1500, 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 1500 per 1000 gallons of water (8 to 80 ppm WSCP 1500) 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 into the sump of water cooling towers.

**SWIMMING POOLS, HEATED SWIMMING POOLS, EXTERIOR SPAS, WHIRLPOOLS AND HOT TUBS:** For maximum effectiveness of WSCP 1500 in pools, spas, whirlpools and hot tubs, clean those systems with heavy growth of algae prior to using WSCP 1500.

For pools having just visible algae growth, add an initial dose of 50 to 77 fluid ounces of WSCP 1500 per 10,000 gallons 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 1500 per 10,000 gallons of water. To maintain pools free of visible algae growth, make subsequent additions of 9 to 18 fluid ounces of WSCP 1500 per 10,000 gallons of water every 5 to 7 days after initial treatment. Uniform distribution of WSCP 1500 throughout the water in the pool is necessary for maximum effectiveness.

Spas, whirlpools and hot tubs having just visible algae growth require an initial dose of 5 to 8 fluid ounces of WSCP 1500 per 1000 gallons of water. For treatment of a freshly cleaned spa, whirlpool and hot tub, add initially 3 to 5 fluid ounces of WSCP 1500 per 1000 gallons of water. Make subsequent additions of 1 to 2 fluid ounces WSCP 1500 every 5 to 7 days after the initial dose for maintenance.

WSCP 1500 will prevent growth of most algae during the off-season winter months when pools are not in use. For pools which have been properly treated during the swimming season and are free of visible algae, add 27 to 43 fluid ounces of algaecide per 10,000 gallons of water. If, at the end of swimming season, pools have some visible algae growth, add 50 to 77 fluid ounces per 10,000 gallons of water. It is necessary that a uniform distribution of algaecide throughout the water and the pool be made for maximum effectiveness. If the pool is not covered, it may be necessary to repeat the treatment one or more times during the season.

WSCP 1500 is compatible with those chemicals normally used to treat pools and spas and is effective at both acid and alkaline pH. WSCP 1500 can be used in pools and spas treated with chlorine chemicals and may reduce the amount of those chemicals normally required. However, do not mix WSCP 1500 with concentrated dry or liquid chlorine products.

**DECORATIVE FOUNTAINS:** WSCP 1500 is used to control the growth of algae in decorative fountains that do not contain fish. Manually clean heavy growths of algae prior to treatment. Fountains with just visible algae growth require an initial dose of 5 to 8 fluid ounces of WSCP 1500 per 1000 gallons of water. To treat a freshly cleaned and filled fountain, add 3 to 5 fluid ounces of WSCP 1500 per 1000 gallons of water. For maintenance dosages, add 1 to 2 fluid ounces of WSCP 1500 per 1000 gallons of water every 5 to 7 days as needed. Make sure WSCP 1500 is added at a point where it can be uniformly distributed. WSCP 1500 may be used in fountains treated with chlorine chemicals, but do not mix WSCP 1500 with concentrated dry or liquid chlorine products.

**INDUSTRIAL AIR WASHING SYSTEMS:** WSCP 1500 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. Make an initial slug dose of 14.8 to 24.7 fluid ounces of WSCP 1500 per 1000 gallons of water. Repeat initial dosage until control is evident. Make subsequent slug additions of 10.1 to 24.7 fluid ounces of WSCP 1500 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.

leaf 9

# WSCP 1500

## Buckman

### Storage and Disposal

See attached document for Storage and Disposal.

*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. 1448-212

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  
3/13/2012**

(Nonrefillable Containers, capacity of 5 gallons or less)

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. In case of spills, use sawdust or sand to absorb the spilled pesticide 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 HANDLING:** Nonrefillable container. Do not reuse or refill this container. 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 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 by other procedures if approved by state and local authorities.

(Nonrefillable Containers, capacity of greater than 5 gallons)

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. In case of spills, use sawdust or sand to absorb the spilled pesticide and disposed of in a sanitary landfill. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** Pesticide wastes may be 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 HANDLING:** Nonrefillable container. Do not reuse or refill this container. 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 1/4 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, by other procedures if approved by state and local authorities.

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

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. In case of spills, use sawdust or sand to absorb the spilled pesticide and disposed of in a sanitary landfill. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** Pesticide wastes may be 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 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 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.

(Refillable Plastic Containers, capacity of 55 gallons or less)

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. In case of spills, use sawdust or sand to absorb the spilled pesticide and disposed of in a sanitary landfill.



**PESTICIDE DISPOSAL:** Pesticide wastes may be 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 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.

(Residential/Homeowner)

**STORAGE and DISPOSAL:** Keep container closed when not in use and away from children and persons unfamiliar with its use. Store away from food. Leaking or damaged containers must be placed in a plastic bag and discarded in the trash. Mop up spills with clean water. Nonrefillable container: Do not reuse or refill empty container. Wrap container and place in trash.

(Commercial)

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

**PESTICIDE STORAGE:** Keep container closed when not in use and away from children and persons unfamiliar with its use. Store away from food. Leaking or damaged containers must be placed in a plastic bag and discarded in the trash. Mop up spills with clean water.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill empty container. Triple rinse or equivalent. Offer for recycling or puncture and discard in sanitary landfill or by other procedures if approved by state and local authorities.