

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 22 2001

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

Attention: Carl F. Watson, Ph.D

Subject: WSKT-10
EPA Registration No. 1448-398
Letter dated March April 21, 2000

This submission is in response to your eight month product reregistration response for Methylisothiazolene RED. According to our records, all science reviews for this product mentioned above have been reviewed; however, since this product contains multiple active ingredients it may not be reregistered until a favorable eligibility decision is made for all active ingredients. The Agency will issue an amended reregistration at this time.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable, provided that you make the following labeling changes below.

1. As per the Acute Toxicity Review dated November 29, 2000, the First Aid statements must be revised to read as follows:

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. Call a poison control center or doctor for treatment advices.

CONCURRENCES

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

IF SWALLOWED:

Call a 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 by a poison control center or doctor.

IF ON SKIN:

Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment.

IF INHALED:

Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

As per PR Notice 2001-1, the following statements and information near the First Aid Statements must be included to read:

- “In case of emergency for additional information call toll free 1-800-(Registrant fill in).
- “Have the product container or label with you when calling a poison control center or doctor or going for treatment”.

2. As per the Acute Toxicity Review dated November 29, 2000, the Hazards to Humans and Domestic Animals must be revised to read as follows:

Precautionary Statements
 Hazards to Humans and Domestic Animals
 Danger

Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on Skin or on clothing. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Remove contaminated clothing and wash clothing before reuse. Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove Personal Protective Equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly.

3. As per the Acute Toxicity Review dated November 29, 2000, the PPE must be revised to read as follows:

Personal Protective Equipment

Applicators and other handlers must wear:

- Coverall worn over long-sleeved shirt and long pants
- Goggles or face shield
- Chemical-resistant gloves, (such as barrier laminate, butyl rubber, Neoprene rubber, nitrile rubber, polyvinyl chloride (PVC) and Viton)

For Cleaning Equipment:

- Chemical-resistant apron

4. As per the Product Chemistry Review dated May 11, 2000, the following heading "Physical and Chemical Hazards" text is required.

"This product is corrosive to mild steel"

5. The signal word "DANGER" must have the Spanish version "PELIGRO" added to the label.

6. In the Storage and Disposal section, the statement "Do not contaminate water, food, or feed by storage or disposal must fall directly below the Storage and Disposal heading. Also change the word "PROHIBITIONS" to "PESTICIDE STORAGE".

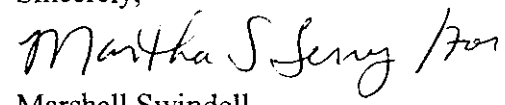
8. As per the RED, the following statement must be added to the Direction For Use:

"Do not apply this product in a way that will contact workers or other persons"

Submit two (2) copies of final printed labeling for our review. A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobial Division (7510C)

Enclosure

WSKT-10

KEEP OUT OF REACH OF CHILDREN
DANGER

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes eye damage and skin burns. May cause allergic skin reaction. Harmful if inhaled. May be fatal if swallowed. Do not get in eyes, on skin, or clothing. Mixers, loaders and others exposed to this product must wear: long-sleeved shirt and long pants; chemical resistant gloves such as nitrile or butyl rubber; shoes plus socks; goggles and face shield; and chemical resistant apron. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist use detergent and hot water. Keep and wash PPE separately from other laundry. Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly. This product may cause skin sensitization reactions in some people.

STATEMENT OF PRACTICAL TREATMENT:

If Swallowed: Do not induce vomiting. Drink promptly a large quantity of egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol. Call a physician immediately.

Never give anything by mouth to an unconscious person. If Inhaled: Remove immediately to fresh air. If not breathing apply artificial respiration. If breathing is difficult give oxygen. Call a physician. **If on Skin:** Wash thoroughly with soap and water. Remove and wash contaminated clothing before re-use.

If in Eyes: Flush with plenty of water for 15 minutes. Call a physician. **NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS: This chemical is toxic to terrestrial and aquatic plants, fish and aquatic invertebrates. 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. Do not contaminate water by cleaning of equipment or disposal of waste. Apply this pesticide only as specified on the label.

STORAGE AND DISPOSAL

PROHIBITIONS: This product is corrosive to mild steel. Do not store or transport in unlined metal containers. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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 of the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: **METAL CONTAINERS:** 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. **PLASTIC CONTAINERS:** Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

ACTIVE INGREDIENTS:

Poly(oxyethylene(dimethylimino)ethylene	
(dimethylimino)ethylene dichloride.....	8.00%
5-Chloro-2-Methyl-4-Isothiazolin-3-one.....	0.52%
2-Methyl-4-Isothiazolin-3-one.....	0.19%
INERT INGREDIENTS.....	93.29%

GENERAL: CONSULT FEDERAL, STATE, OR LOCAL DISPOSAL AUTHORITIES FOR APPROVED ALTERNATIVE PROCEDURES.

DIRECTIONS FOR USE

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

COOLING WATER SYSTEMS: WSKT 10 may be used to control the growth of microorganisms including bacteria, algae, and fungi in recirculating cooling water systems. In noticeably fouled systems, WSKT 10 should be added at a dosage rate of 11.6 to 69.6 fluid ounces per 1000 gallons of system water (100 to 600 ppm WSKT 10). Extremely fouled systems should be cleaned to remove excess algal growth, excessive biofilm, and other deposits prior to program initiation. Subsequent additions of 1.16 to 34.8 fluid ounces of WSKT 10 per 1000 gallons of system water (10 to 300 ppm WSKT 10) should be made to maintain control.

AIR WASHER SYSTEMS: WSKT 10 may be used to control microbiological fouling in industrial airwash systems. Extremely fouled systems should be cleaned prior to addition of WSKT 10. When systems are noticeably fouled, WSKT 10 should be added at an application rate of 11.6 to 92.8 fluid ounces per 1000 gallons of system water (100 to 800 ppm WSKT 10) daily until control is evident. Subsequent additions of 11.6 to 58.0 fluid ounces per 1000 gallons of system water (100 to 500 ppm WSKT 10) should be added as needed to maintain control.

METALWORKING FLUID SYSTEMS: WSKT 10 may be used to prevent microbial degradation and fouling in metalworking fluid systems. WSKT 10 should be added tank-side to the system at 23.2 to 232 fluid ounces per 1000 gallons of dilute fluid (200 to 2000 ppm product) as needed to maintain control. Systems with excessive fouling should be cleaned prior to initiating the program.

FIRE WATER PROTECTION SYSTEMS: WSKT 10 can be added to help control microorganisms which may foul or cause corrosion in fire water protection systems. WSKT 10 should be added to the system at a point where it will be adequately distributed throughout the system. WSKT 10 should be fed to maintain 200 to 800 ppm of product in the system. This will require an initial dose of 23.2 to 92.8 fluid ounces per 1000 gallons of water. Subsequent doses should be evaluated based on microbiological activity and product level testing.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 2 2 2001

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

1448-398

HMIS/NPCA RATING
Health 3 Flammability 1 Reactivity 1

Product Weight: 8.7 lbs./gal. 1.04 kg/l
NET CONTENTS MARKED ON CONTAINER
EPA Reg. No. 1448-398

Manufactured By EPA Est. No. 1448-TN-1
BUCKMAN LABORATORIES, INC.
1256 N. McLEAN BLVD., MEMPHIS, TN 38108 USA
(901) 278-0330 or 1-800-BUCKMAN

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