

1448-398

9-18-2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 18 2001

Ms. Jody L. Stobbe
Buckman Laboratories, Inc.
1256 N. McLean Blvd.
Memphis, TN 38108

Subject: Revised Labeling to Maintain the Signal Word "Danger" and
Added New Use
WSKT-10
EPA Registration No. 1448-398
Amendment Application Dated August 17, 2001

Dear Ms. Stobbe:

The letter acknowledges receipt of your application of amendment to maintain the signal word "Danger" and add a new label claim for "Petroleum Secondary Recovery".

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the revisions listed below.

1. Change the heading Statement of Practical Treatment to First Aid. The heading and statements must be revised to read as follows:

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. Call a poison control center or doctor for treatment advice."

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

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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 advice.”

IF INHALED: Move person to fresh air.
if person is not breathing, call 911 or an ambulance, then give artificial
respiration preferable mouth-to-mouth if possible.
Call a Poison Control Center or doctor for further treatment advice.

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.

The following statements are suggested types of information that may be
included in the First Aid statements if applicable:

technical information on symptomatology;
use of supportive treatments to maintain life functions;
medicine that will counteract the specific physiological effects of pesticide;
company telephone number to specific medical personnel who can provide
specialized medical advice.

2. Add the following PPE heading and statements to the label.

“Personal Protective Equipment (PPE)”
“Applicators and other handlers must wear:
Coveralls over long sleeved shirt and long pants
Socks and chemical resistant footwear
Goggles or face shield.
Chemical resistant gloves (such as waterproof or rubber gloves).
Respirator with an organic vapor removing cartridge with a prefilter approved
for pesticides (MSHA/NIOSH approval number prefix TC-23C). or a canister
approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or
NIOSH approval number prefix organic vapor (OV) cartridge or canister with
any N,R,P, or HE prefilter.

3. The following User Safety Recommendations including the sub-heading
“User Safety Recommendations” must be added to the label.

“User should wash hand before eating, drinking, chewing gum, using tobacco or using the toilet. User should **remove clothing immediately** if pesticide gets inside. Then wash thoroughly and put on clean clothing.

“User should **remove PPE immediately** after handling, this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly.

Submit three (3) copies of your final printed labeling before you release the product for shipment.

A stamp copy of the labeling is enclosed for your records.

Sincerely,



Adam Heyward.
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosed



WSKT 10

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 18 2001

ACTIVE INGREDIENTS:
Poly[oxyethylene(dimethyliminio)ethylene]..... 6.0%
(dimethyliminio)ethylene dichloride)
5-Chloro-2-Methyl-4-Isothiazolin-3-one..... .52%
2-Methyl-4-Isothiazolin-3-one..... .19%
INERT INGREDIENTS: 93.29%

KEEP OUT OF REACH OF CHILDREN
DANGER

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield. Harmful if swallowed or absorbed through skin. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. This product may cause skin sensitization reactions in some people.

Statement of Practical Treatment:

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 advice.

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.

In case of emergency, for additional information, call toll free 1-800-282-5626. Have the product container or label with you when calling a poison control center or doctor or going for treatment. **NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public 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.

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

HMS / NPCA Ratings

Health 3 Flammability 1 Reactivity 1

Product Weight

8.7 lbs/gal 1.04 kg/l

Net contents are marked on the container.

EPA Reg. No. 1448-398

Manufactured by EPA Est. No. 1448-TN-1

Buckman Laboratories, Inc.

(901) 278-0330

1256 N. McLean Blvd. Memphis, TN 38108 USA

or 1-800-BUCKMAN

amended, for the pesticide,
registered under EPA Reg. No. 1448-398

Directions for Use

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

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

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.

PETROLEUM SECONDARY RECOVERY: WSKT 10 is used to control sulfate reducing bacteria, slime forming bacteria, and fungi in oil field water, polymer or micellar floods, water disposal systems, and other oil field water systems. WSKT 10 is used at concentrations of 100 to 800 ppm (weight/weight) or 11.6 to 92.8 fluid ounces per 1000 gallons of treated water. Additions should be made continuously or intermittently by means of a chemical-metering pump at the free water knockouts, before or after injection pumps and injection well headers. Continuous Feed Method: When system is noticeably fouled, add WSKT 10 at a rate of 100 to 800 ppm (weight/weight) or 11.6 to 92.8 fluid ounces per 1000 gallons of treated water until desired degree of control is achieved. Then treat with 100 to 800 ppm (weight/weight) or 11.6 to 92.8 fluid ounces per 1000 gallons of treated water continuously, or as needed to maintain control. Intermittent Feed Method: When desired, WSKT 10 can be fed directly by a timed chemical-metering pump. The dosage rate and feed time vary according to the degree of fouling, but typically 200 to 800 ppm (weight/weight) or 23.2 to 92.8 fluid ounces per 1000 gallons of water is added to the treated system for 4-8 hours per day, 1-4 times per week, or as needed to maintain control.

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