

1448-400

06-01-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

JUN 1 2010

OFFICE OF  
PREVENTION, PESTICIDE  
AND TOXIC SUBSTANCES

Carl F. Watson  
**Buckman Laboratories, Inc.**  
1256 N. McLean Blvd  
Memphis, TN 38108

Subject: **PCA 10**  
EPA Registration No. 1448-400  
Application Date: March 2, 2010  
Receipt Date: March 3, 2010

Dear Mr. Watson:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted with conditions.

**Proposed Amendment:**

- Update label as PR Notice 2007-4
- Update the FIRST AID chart
- Update the Precautionary Statements language
- Update Directions for Use

**Conditions**

Revise label as follows:

- 1.) On page 5 of your label, under subheading "Container Handling" delete the second instruction referencing that cleaning is the responsibility of the refiller as it is a repetitive statement.
- 2.) PRN 2005-1, Guidance for Mandatory and Advisory Labeling Statements, states that **Mandatory statements**, which commonly use imperative verbs such as "must" Or "shall", either require action or prohibit the user from taking certain action. **Advisory statements** generally provide information, either in support of the Mandatory statements or about the product in general. **To ensure that the intent Of each labeling statement is clear, mandatory statements need to be clearly Distinguishable from advisory statements.**

Therefore, you must change the "Recommendation" to "Requirements" and "should" to "must" under the Directions for Use heading on page 3 of your label.

- 3.) Revise the subheading "Container Disposal" to read "Container Handling" on page 2.
- 4.) Delete the third sentence, "offer for recycling if available," under Container Handling for non-refillable containers with a capacity of 5 gallons or less and greater than 5 gallons on page 2.

5.) Revise the last statement under Container Handling for all container sizes on page 2 to read: "Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities." Since your product is packaged in both plastic and metal containers, you must remove the reference to burning as you can not burn metal containers.

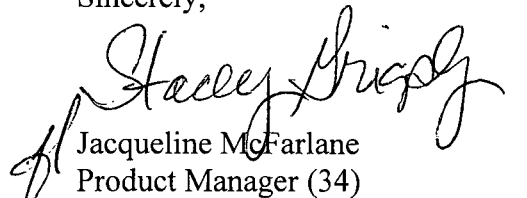
6.) Revise the refillable containers with a capacity of 55 gallons or less and greater than 55 gallons on pages 5 and 6 by deleting the last paragraph because it appears in the Environmental Hazards section.

**General Comment:**

A stamped label with conditions is enclosed for your records. Submit a copy of your final printed label before distributing or selling the product bearing the revised labeling.

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 Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at [grigsby.stacey@epa.gov](mailto:grigsby.stacey@epa.gov) during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

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

**Enclosure: EPA stamped accepted labeling**



## Storage and Disposal

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

**PESTICIDE 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:** Pesticide wastes are acutely 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 DISPOSAL:

(Text for all nonrefillable containers)

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying.

{Liquid residue removal statement for nonrefillable containers with capacity of 5 gals or less}

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 ¼ 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.

{Liquid residue removal statement for nonrefillable containers with capacity of >5 gals}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ 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.

(Text for all nonrefillable containers)

Then offer for recycling if available or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

{Text for refillable containers}

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.

For containers larger than 55 gallons:

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.

For containers 55 gallons and smaller:

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.

Do not discharge rinsate containing this product 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 rinsate containing this product to sewer systems without prior approval from the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Batch code: \_\_\_\_\_

**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. 1448-400

Product Weight 8.7 lbs/gal 1.04 kg/L

Net contents are marked on the container.

HMIS / NPCA Ratings

Health 3 Flammability 1 Reactivity 1

Last Revision

2/8/2010

## Directions for Use

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

PCA 10 is used to control algae, bacteria, and fungi in recirculating commercial and industrial cooling towers and recirculating cooling systems. Prior to its use, systems <sup>Maintain</sup> should be cleaned to remove existing algal growth, microbiological slime, and other deposits. An initial slug addition of 5.8 to 14.6 fluid ounces of PCA 10 per 1000 gallons of water to provide 48 to 120 ppm PCA 10, based on the total weight of water in the system, is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 1.46 to 14.6 fluid ounces of PCA 10 per 1000 gallons of water (12 to 120 ppm PCA 10) should be employed 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.

PCA 10 is used to control bacteria in industrial air-washing systems that maintain effective mist eliminating components. Prior to its use, systems should be cleaned to remove bacterial slime and other deposits. An initial slug dose of 22.2 to 36.6 fluid ounces of PCA 10 per 1000 gallons of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 15 to 36.6 fluid ounces of PCA 10 per 1000 gallons of water should be employed each 1 to 5 days, or as needed. The frequency of addition depends on the relative amount of bleedoff and the severity of the bacterial problem. Slug additions may be made to the sump or the water collection trays of the airwash systems.

PCA 10 is used to control the growth of algae in recreational water systems such as pools, spas, whirlpools, and hot tubs. PCA 10 can also be used to control algae growth in decorative fountains and ponds. For optimum results, systems containing heavy algae growth should be cleaned prior to using PCA 10.

For recreational water systems having just visible algae growth, add 22 to 60 fluid ounces of PCA 10 per 10,000 gallons of water. Maintain re-circulation of the pool during treatment and removed settled algae debris. Repeat treatment every 3 - 5 days until algae growth has been removed. Brush walls and floors between applications. For treatment of freshly cleaned and filled recreational water add 12 to 22 fluid ounces of PCA 10 per 10,000 gallons of water. Subsequent additions of 4 to 8 fluid ounces of PCA 10 per 10,000 gallons of water should be made every 5 to 7 days after initial treatment for maintenance.

For decorative fountains and ponds having just visible algae growth, add an initial dose of 1.2 to 4 fluid ounces of PCA 10 per 1000 gallons of water. For treatment of freshly cleaned decorative fountains or ponds, add 0.4 to 2.0 fluid ounces of PCA 10 per 1000 gallons of water every 5 to 7 days for maintenance.

PCA 10 will control and prevent most algae growths during off-season winter months when recreational water systems are not in use. For systems which have been properly treated during the summer months, and are free of visible algae growth, add 20 to 40 fluid ounces of PCA 10 per 10,000 gallons of water. If, at the end of the swimming season, systems have some visible algae growth, add 40 to 60 ounces of PCA 10 per 10,000 gallons of water. It is necessary that a uniform distribution of algicide is obtained throughout the water for maximum effectiveness. If recreational water systems, such as pools and spas, are not covered during the off-season, it may be necessary to repeat treatment one or more times during the season. PCA 10 is compatible at use levels with other chemicals normally employed to treat recreational water systems. To prevent water cloudiness during treatment, do not add chlorinated shock treatments when applying PCA 10. Do not mix PCA 10 with concentrated dry or liquid chlorine products.

