

1677-205

7/7/2009

1/7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

JUL 07 2009

Ecolab, Inc.
370 N. Wabasha Street
St. Paul, MN 55102

Attention: Rhonda Schulz
Associate Director

Subject: A-215
EPA Registration No. 1677-205
Your Amendment Dated May 26, 2009

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

-Updated Product Labeling

General Comment

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

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

Sincerely

A handwritten signature in cursive script that reads "Marshall Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobials Division (7510P)

Enclosure

A-215

COMMERCIAL MICROBIOCIDE

A broad spectrum microbiocide for controlling slime-forming and sulfate-reducing bacteria, fungi, yeast, and algae. For use in sugar beet mills and process water systems; paper mills and associated process water systems; pigments and filler slurries for food and non-food contact paper and paperboard; non-food contact water based coatings for paper and paperboard; air washers and industrial scrubbing systems; recirculating cooling and process water systems; reverse osmosis membranes; heat transfer systems; service water and auxiliary systems; industrial wastewater systems including wastewater sludge and holding tanks; water-based conveyor lubricants; aqueous metalworking fluids; oil field applications including drilling muds, workover, fracturing, completion and packer fluids; gas production, transmission and storage; and preservation of food contact adhesives and mineral slurries used in papermaking.

Active Ingredients:

Glutaraldehyde..... 15.0%

Inert Ingredients: 85.0%

Total: 100.0%

ACCEPTED
with COMMENTS
EPA Letter Dated:

JUL -7 2009

**KEEP OUT OF REACH OF CHILDREN
DANGER**

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1677-205

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CORROSIVE: Causes irreversible eye damage. Causes skin irritation. Harmful if inhaled, swallowed or absorbed through the skin. May cause allergic skin reactions. Causes asthmatic signs and symptoms in hyper-reactive individuals. Do not get in eyes, on skin or on clothing. Avoid breathing vapors. Not to be used as an aerosol. Do not swallow. Wear eye goggles, rubber gloves and protective clothing including long-sleeved shirt, long pants, shoes, socks, chemical-resistant gloves and chemical-resistant apron. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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 treatment advice.

If On Skin Or Clothing: 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 a poison control center or doctor immediately for treatment advice. Have a 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 mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

FOR EMERGENCY MEDICAL INFORMATION CALL TOLL FREE: 1-800-328-0026

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 (5 gallons or greater)

This product is toxic to fish, aquatic invertebrates, oysters and shrimp. 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 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.

Instructions in Case of Spills or leaks: Wear goggles, rubber gloves, and protective clothing. Absorb spills and leaks with inert material such as sand, clay or vermiculite. Shovel into a sealable container and dispose of in an authorized EPA disposal facility.

In Case of Fire: Use water, carbon dioxide, dry chemical (eg. Sodium bicarbonate) extinguishing medias. Fire fighters should be equipped with self-contained breathing apparatus and turnout gear.

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DIRECTIONS FOR USE

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

GENERAL USE DIRECTIONS

Add A-215 at a point of uniform mixing where the treated water will be circulated or mixed through the system. Badly fouled systems should be cleaned before treatment begins. A-215 can be applied (either in a single dose) or by continuous feed where stated. Where appropriate, feed points should be located to minimize vapor.

JUL - 7 2009
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AIR WASHERS AND INDUSTRIAL SCRUBBING SYSTEMS, RECIRCULATING COOLING AND PROCESS WATER SYSTEMS

Use only in industrial air washer systems, which have mist-eliminating components. Badly fouled systems can be shock treated by using the highest recommended rate of A-215. Under these conditions, blowdown should be discontinued for up to 24 hours. Apply by intermittent or continuous feed methods. Add at a place such as the basin area.

Initial Dose: When the system is noticeably fouled, add 40-80 fl. oz. (325-650ppm) of A-215 per 1,000 gal. of water in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 16-40 fl. Oz. (130-325 ppm) of A-215 per 1,000 gal. of water in the system per day, or as needed to maintain control.

Not for use in industrial scrubbing systems in the State of California.

REVERSE OSMOSIS MEMBRANES

Use only where approved for compatibility by the membrane manufacturer. Immerse membrane in a tank containing 6,667 to 66,667 ppm A-215 for 6 to 24 hours. A-215 can also be added to in-line recirculating systems of installed out of service osmosis equipment. Add 667 to 6,667 ppm A-215 to the tank on the circulating system and maintain this concentration by periodic addition to counteract any system leakage. Flush the system through with clean water before returning to service.

Not for use in the State of California.

HEAT TRANSFER SYSTEMS

For use in Evaporative Condensers, Dairy Sweetwater Systems, Hydrostatic Sterilizers and Retorts, and Pasteurizers and Warmers, and Once-Through Cooling Water Systems.

Initial Dose: When the system is noticeably fouled, add 40-80 fl. oz. (325-650 ppm) of A-215 per 1,000 gal. of water in the system.

Subsequent Dose: For maintenance, use a continuous feed of 16-40 fl. oz. (130-325 ppm) of A-215 per 1,000 gal. of water in the system per day.

Not for use in Dairy Sweetwater Systems and Once-Through Cooling Water Systems in the State of California.

SERVICE WATER AND AUXILLARY SYSTEMS

Use in systems such as fire water reserves, spray paint booths, and emergency cooling water systems. Dose initially at 40-80 fl. oz. (325-650 ppm) of A-215 per 1,000 gal. of water in the system. Reapply as necessary to maintain this concentration.

4/7

Not for use in the State of California.

INDUSTRIAL WASTEWATER SYSTEMS

For use in aerobic and anaerobic, belt pressed, digested and undigested sludges; and holding tanks. Add 1.7 to 7.7 gal. (1500 to 7500 ppm) of A-215 per 1,000 gal. of wastewater or sludge. Add at a place such as the digester.

Not for use in the State of California.

SUGAR BEET MILLS AND PROCESS WATER SYSTEMS

Apply by intermittent or continuous feed methods. Repeat intermittent dose until control is achieved. The total should not exceed 353 gal. per 1,000 tons of beets sliced per day.

Initial Dose: When the system is noticeably contaminated, add 18.3 to 45.3 fl. oz. (667 to 1667 ppm) of A-215 per ton of sliced beets.

Subsequent Dose: When microbial control is evident, add 2.7 to 27.3 fl. oz. (100 to 1,000 ppm) of A-215 per ton of sliced beets to the system as necessary to maintain control.

Not for use in the State of California.

PAPER MILLS AND ASSOCIATED PROCESS WATER SYSTEMS

Apply by intermittent or continuous feed methods.

Initial Dose: When the water is noticeably contaminated, add 1.67-10.0 lbs per ton of pulp or paper (dry basis). Repeat until control is achieved.

Subsequent Dose: When microbial control is evident add 1.0-6.67 lbs per ton to pulp or paper (dry basis) as necessary to maintain control.

PIGMENTS AND FILLER SLURRIES FOR FOOD AND NON-FOOD CONTACT PAPER AND PAPERBOARD

To inhibit the growth of spoilage microorganisms during manufacture, storage and distribution of pigments and filler slurries such as kaolin, calcium carbonate and titanium dioxide. Add A-215 to produce a concentration of 333-2,000 ppm by weight of the formulation slurry (3.3-20.0 lbs of product per 10,000 lbs. of slurry). Apply once during manufacture.

Not for use in pigment and filler slurries for non-food contact paper and paperboard in the State of California.

WATER BASED COATINGS FOR NON-FOOD CONTACT PAPER AND PAPERBOARD

To inhibit the growth of spoilage microorganisms during manufacture distribution of water-based coatings for use on non-food-contact paper and paperboard. Add A-215 at 333-2,000 ppm by weight of the formulation slurry (3.3-20.0 lbs of product per 10,000 lbs of slurry).

OIL WELL WATER FLOODS

Initial Dose: Add A-215 at 333-16,667 ppm of the water flood system (0.3-15.0 gal. A-215 per 1,000 gal. floodwater). Add A-215 intermittently until control is achieved.

Subsequent dose: Add 167 to 833 ppm of A-215 (0.17 to 0.83 gal. of A-215 to each 1,000 gal.) each week to maintain bacterial control. Add at a place such as the area of addition of make up water to the holding tank.

DRILLING MUDS, WORKOVER, FRACTURING AND COMPLETIONS FLUIDS

Add 333 to 3,333 ppm A-215 (1.27 to 12.7 gal. A-215 per 100 barrels or 4,200 gal.), depending on the severity of the bacterial contamination. Add additional A-215 to maintain the proper concentration as the total volume of the system increases with the well depth. For workover fluids, circulate the system until the fluid returns clear. Shut the system down and idle for several hours. Remove the workover fluid. This well should be ready for productive use.

Not for use in fracturing and completion fluids in the State of California.

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5/7

PACKER FLUIDS

Add A-215 at 167-2,000 ppm (0.7 to 8.3 gal. per 100 barrels of fluid) to a freshly prepared fluid, depending on the severity of contamination. Apply once before sealing the treated packer fluid in the wall between the casing and production tube.

Not for use in the State of California.

GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS

Add A-215 to inhibit microbiological growth in gas production or transmission pipelines and systems supplying liquid and natural gas during commercial production. Inject A-215 directly into the transmission pipeline at the earliest available entry point. Add A-215 at a dose rate of 167 to 2,000 ppm of the water in the system. Injections to the system should be made on a weekly basis, or as needed to maintain control.

Not for use in the State of California.

GAS STORAGE WELLS AND SYSTEMS

Treat individual injection wells with A-215 at 1,667 to 16,667 ppm and maintain this concentration in the water present in the formation. Treatment of the well should take place during the summer before gas is injected. Dose individual drips to maintain a concentration of 666 to 6,666 ppm A-215. Treatment should be repeated yearly, or as needed to maintain control.

Not for use in the State of California.

HYDROTESTING

For use in pipelines, valve systems, boilers and vessels. Water used to hydrotest pipelines or vessels should contain 333 to 13,333 ppm (0.33 to 13.3 gal. per 1,000 gal. water) of A-215, depending on water quality, pH, environmental conditions and the length of time the equipment will remain idle. At neutral pH and below, treated water can remain in the system for more than 1 year.

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PIPELINE PIGGING AND SCRAPPING OPERATION

Add A-215 to the water immediately following the scraper. This water volume can be kept to a minimum and contained between the scraper and trailing pig. Add A-215 at 3,333 to 33,333 ppm (0.33 to 3.3 gal. A-215 per 100 gal. water), depending on the length of the pipeline and the severity of biofouling.

Not for use in the State of California.

1677-205

WATER BASED CONVEYOR LUBRICANTS

For use in brewery, juice, dairy, beverage, and food processing systems. Thoroughly clean tracks and conveyors to remove all gross contamination. Rinse well. Use a commercially available automatic feed system to provide 4.7 to 28.0 fluid ounces (333 to 2,000 ppm) of A-215 per 100 gal. of dilute lubricant.

Avoid contamination of food in application of this product.

Not for use in the State of California.

GENERAL PRESERVATION

Non-Food Contact:

For use by manufacturers for in-can preservation of aqueous industrial, institutional and consumer non-food contact products that require the control of bacteria and fungi; for example, mineral slurries used in paints and plastics, concrete admixtures, pigments, lattices, printing inks, paint, laundry detergents, and cleaning products. Add A-215 to the product formulation at a rate of 9.3 to 93.3 fluid ounces (667 to 6667 ppm) per 100 gal. of the water content of the product. Mix uniformly.

Food Contact:

For use by manufacturers that require the control of bacteria or fungi in the preservation of food-contact adhesives and mineral slurries used in papermaking.

Not for use in the State of California.

6/7

AQUEOUS METALWORKING FLUIDS

A-215 should be added to a metalworking fluid system at a point of uniform mixing such as the fluid collection tank. Additions may be added intermittently at intervals of one week or less.

Initial Dose: When the system is noticeably fouled apply 0.67 to 2.0 gal. of A-215 per 1,000 gal. of metalworking fluid to the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 0.27 to 1.33 gal. of A-215 per 1,000 gal. of metalworking fluid to the system weekly, or as needed to maintain control. Badly fouled systems should be cleaned before treatment begins.

Not for use in the State of California.

CONDITIONS OF SALE

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risk inherently associated with use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of the Seller. All such risks shall be assumed by the Buyer. The manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to above.

THE MANUFACTURER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

The manufacturer offers this product, and the Buyer and User accept it, subject to the foregoing Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorized representative.

STORAGE & DISPOSAL

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

Pesticide Storage: A-215 solutions are corrosive to many commonly used materials of construction such as steel, galvanized iron, aluminum, tin and zinc. These solutions can be stored and handled in baked phenolic lined steel, stainless steel or reinforced epoxy equipment. This product freezes at approximately -20°C (-4°F). Therefore, unless the storage tank is inside or underground, heating and insulation may be required. If heating is needed, exposure to high temperatures should be avoided. For short storage (1 month) temperatures up to 100°F can be tolerated; however, the preferred maximum storage temperature is approximately 80°F. Keep away from fire and open flames. A stainless steel centrifugal pump is suggested for transfer service.

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:

(≤ 55-gallon rigid) Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Offer for recycling, if available, or discard in trash.

(Bladder in box) Remove empty bladder from outer corrugated box. Triple rinse bladder (or equivalent). Offer box and bladder for recycling or discard in trash.

(Totes) Verify that the tote is empty. Do not rinse or clean. Seal tote and contact Ecolab for return.

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3/7

EPA Reg. No. 1677-205

EPA Est. 1677-MN-1 (P), 1677-CA-2(R), 1677-TX-1(D), 1677-OH-1(H), 1677-IL-1(J), 1677-GA-1(M), 1677-PR-1(B), 1677-CA-1(S), 1677-WV-1(V), 1677-IL-2 (J)

Superscript refers to first letter of date code

Ecolab Inc.
370 Wabasha Street N.
St. Paul, MN 55102-1390

Net Contents: 1 U.S. quart (946 ml) 1 U.S. gallon (3.78 L) 2.5 U.S. gallons (9.45 L) 5 U.S. gallons (18.9 L) 55 U.S. gallons (208.8 L)

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