



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**December 14, 2006**

Juli Mann  
Paralegal Specialist  
Steptoe & Johnson, LLP  
1330 Connecticut Avenue, NW  
Washington, DC 20036-1795

Subject: Notification Application per PR Notice 98-10  
**Nalco 2594**  
EPA Reg. No. 1706-159  
Application Date: December 8, 2006  
Receipt Date: December 8, 2006

Dear Juli Mann:

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

**Proposed Notification:**

- Alternate small [ 50 ml and 100 ml ] pesticide containers.

**General Comment:**

- Based on a review of the material submitted, the following comment applies:
- This notification is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or by email at [heyward.adam@epa.gov](mailto:heyward.adam@epa.gov) or Killian Swift at (703) 308-6346 or by email at [swift.killian@epa.gov](mailto:swift.killian@epa.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Heyward", is written over a horizontal line.

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

**Notification per PR Notice 98-1**

2 86

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060, Approval expires 2-28-95

<b>EPA</b> <b>Environmental Protection Agency</b> Washington, DC 20460	United States <input type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input checked="" type="checkbox"/> <b>Other</b>	OPP Identifier Number
--	--	-----------------------

**Application for Pesticide – Section I**

1. Company/Product Number 1706-159 4. Company/Product (Name) Nalco 2594 5. Name and Address of Applicant (Include ZIP Code) Nalco Co. 1601 West Diehl Road Naperville, IL 60563 <input type="checkbox"/> Check if this is a new address	2. EPA Product Manager Adam Heyward PM# 34 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted 6. <b>Expedited Review.</b> 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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain Below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other – Explain Below.
--	--

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

Notification for alternate small container labeling.

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 statements 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.

**Section - III**

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

**Section - IV**

<b>1. Contact Point</b> (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Juli Mann	Title Paralegal Specialist, Steptoe & Johnson	Telephone No. (Include Area Code) 202-429-3095
<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 <b>(Stamped)</b>
2. Signature 		3. Title Paralegal Specialist, Agent for Nalco Company
4. Typed Name Juli Mann		5. Date December 8, 2006

34

3 8 6

STEPTOE & JOHNSON<sup>LLP</sup>  
ATTORNEYS AT LAW

WRITER'S DIRECT DIAL  
202.429.3095

1330 Connecticut Avenue, NW  
Washington, DC 20036-1795  
Tel 202.429.3000  
Fax 202.429.3902  
steptoe.com

December 8, 2006

*Via HAND DELIVERY*

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: Adam Heyward  
Product Manager, Team 34  
Antimicrobials Division

Subject: Notification for alternate small container labeling per PR Notice 98-10

Product: Nalco 2594 (EPA Reg. No. 1706-159)

Dear Ms. Mitchell:

On behalf of Nalco Company please find enclosed documents for approval of alternate small container labeling for 50 ml and 100 ml containers for Nalco 2594 (EPA Reg. No. 1706-159).

As the container is too small to accommodate the complete label for this product the elements identified in the Label Review Manual for Small Containers, page 18-2, are included on the label: ingredient statement, signal word, child hazard warning, EPA Registration Number and Establishment Number, and a reference to the complete label which will be placed in the product package.

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 for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statements 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.

4 8 6

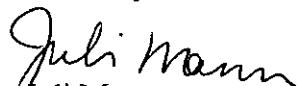
Adam Heyward  
December 8, 2006  
Page 2

The following documents are enclosed with this package:


- Application Form
- Product label (2 copies)

If you have any questions please contact me at the above number. Thank you for your attention to this matter.

Sincerely,


  
Juli Mann  
Paralegal Specialist

ALTERNATE SMALL CONTAINER LABELING. THIS LABEL DOES NOT CONTAIN COMPLETE LABEL LANGUAGE.

		<b>NALCO 2594</b>
ACTIVE INGREDIENT:		
Poly [oxyethylene(dimethyliminio)ethylene- (dimethyliminio)ethylene dichloride]		20.0%
INERT INGREDIENTS		80.0%
TOTAL		100.0%
KEEP OUT OF REACH OF CHILDREN		
CAUTION: See enclosed label for additional precautionary statements.		
EPA REG. NO. 1706-159		EPA EST. NO.
LOT NO	Expiration date	Contents
Nalco Company 1601 West Diehl Road Naperville, IL 60563-1198		
EMERGENCY PHONE NO. (800) 424-9300		

NOTIFICATION  
Date Reviewed: 12-14-06  
Reviewed By: R. S. H. J.

ALTERNATE SMALL CONTAINER LABELING. THIS LABEL DOES NOT CONTAIN COMPLETE LABEL LANGUAGE.

		<b>NALCO 2594</b>
ACTIVE INGREDIENT:		
Poly [oxyethylene(dimethyliminio)ethylene-(dimethyliminio)ethylene d.chloride]		20.0%
INERT INGREDIENTS		80.0%
TOTAL		100.0%
KEEP OUT OF REACH OF CHILDREN.		
CAUTION: See enclosed label for additional precautionary statements.		
EPA REG. NO. 1706-159		EPA EST. NO.
LOT NO.	Expiration date	Contents
Nalco Company 1601 West Diehl Road Naperville, IL 60563-1198		
EMERGENCY PHONE NO. (800) 424-9300		

**NOTIFICATION**  
Date Reviewed: 12-14-06  
Reviewed By: *R. Smith*