

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



JUL 17 2001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Vivienne Gaudette
Staff Product & Regulatory Affairs
Specialist
Ashland Chemical
One Drew Plaza
Boonton, NJ 07005

Dear Ms. Gaudette:

Subject: Revised label in response to EPA's letter
Wrico BGA
EPA Registration No. 1757-87
Your Letter Dated June 14, 2001

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

1. The EPA is not requiring Restricted Use Product Classification for products similar to this product. Therefore, Restricted Use Product languages are not required for the subject product at this time.
2. EPA agrees that the word " Peligro apply to agriculture products, therefore the word "Peligro" is not required on this product label.
3. Under the Storage and Disposal Section, add the word "**Pesticide**" before Storage and remove the sentence "Do not contaminate water, food or feed by storage or disposal."

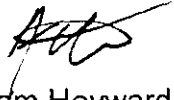
Submit three (3) copies of your final printed labeling before you release the product for shipment bearing the revised labeling. Refer to the A-79 enclosure for further description of final labeling.

A stamped copy is enclosed for your records.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

If you have any questions concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely yours,



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

Enclosure

REDUCED 70%

WRICO® BGA

INDUSTRIAL MICROBIOCIDES

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE AND SKIN BURNS. HARMFUL IF SWALLOWED OR ABSORBED THROUGH THE SKIN.

Do not get in eyes, skin or on clothing. Avoid breathing spray mist. Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

Applicator and other handlers must wear long-sleeved shirt and long pants; socks and shoes; goggles or face shield; chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton.)

Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. If pesticide gets inside clothing, remove clothing immediately, 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 and change into clean clothing.

ENVIRONMENTAL HAZARD

THIS PRODUCT IS TOXIC TO FISH AND AQUATIC ORGANISMS. 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.

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, either directly or through drift. Only protected handlers may be in the area during application.

PRI W9GHA 7/01

ACTIVE INGREDIENTS: Potassium salt of
Ortho-benzyl-para-chlorophenol 23.5%
INERT INGREDIENTS: 76.5%
TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN DANGER

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
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.
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 further treatment advice.
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.
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 by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

In case of emergency call toll free: 1-800-274-5263 or 1-800-ASHLAND

NOTE TO PHYSICIAN:

Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsions may be needed.

EPA Reg. No. 1757-87

EPA Est. No. 1757-NJ-1

1757-TX-1

18533-KS-1

50522-TX-001

Sold by:



Ashland Chemical

Ashland Chemical Company
Division of Ashland Inc.

One Drew Plaza, Boonton, New Jersey 07005

Phone (973) 263-7600/Telex 136444

24 Hour Emergency Telephone Number

1-800-274-5263 or 1-800-ASHLAND

® Registered trademark of Ashland Inc.

Badly fouled systems should be cleaned before treatment is begun.

INDUSTRIAL RECIRCULATING WATER SYSTEMS: For control of bacteria and algae in industrial cooling towers and evaporative condensers, treat the system with 6.4 - 25.6 fluid ounces of WRICO BGA microbiocide per 1000 gallons of water in the system.

INITIAL DOSE: When the system is noticeably fouled, add 13.0 - 25.6 fluid ounces of WRICO BGA microbiocide per 1000 gallons of water in the system. Repeat until control is evident.

SUBSEQUENT DOSE: When microbial control is evident, add 6.4 - 12.8 fluid ounces of WRICO BGA microbiocide per 1000 gallons of water in the system as needed to maintain control.

INDUSTRIAL PROCESS WATER SYSTEMS: For control of bacteria in industrial process water systems, treat the system with 6.4 - 25.6 fluid ounces of WRICO BGA microbiocide per 1000 gallon of water in the system.

STORAGE AND DISPOSAL

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

STORAGE: Store drums in well ventilated, dry area. Do not contaminate water, food or feed by storage or disposal.

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 can not be disposed of by use in accordance to label instructions, contact your Regional Office of the EPA for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, 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.

IMPORTANT NOTICE: SELLER WARRANTS THAT THE PRODUCT CONFORMS TO ITS CHEMICAL DESCRIPTION. ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, ARE DISCLAIMED. BUYER ACCEPTS FULL RESPONSIBILITY FOR COMPLIANCE WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL LAWS AND REGULATIONS.

HMIS/NPCA RATING

HEALTH 3
FLAMMABILITY 0
REACTIVITY 1

**FOR INDUSTRIAL USE ONLY
NET CONTENTS MARKED ON DRUM**

BATCH NO:

NET GAL.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 17 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1757-



**CAUSTIC A
(CONTAINS)**