

Thomas W. Isaac
Sr. Regulatory Specialist
Stephan Company
22 W. Frontage Rd
Northfield, IL 60093

SEP 15 2002

Subject: BTC ® 99 Industrial and/or Commercial Recirculating Cooling Water
Tower Microbicide
EPA Registration No. 1839 -129
Amendment dated: June 17 2002
EPA Received date: June 18, 2002

Dear: Mr Thomas W. Isaac,

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

Proposed Amendment

- Update First Aid statements per PR Notice 2001-1
- Update the Precautionary Statements consistent with Label Review Manual

Label Comments

1. Revise the First Aid Statement for dermal exposure and skin irritation to read:
If in skin or clothing: Take off contaminated clothing. Rinse skin *immediately* with plenty of water for 15-20 minutes. Call poison center or doctor for treatment advice.
2. Storage and Disposal instructions: *"For container sizes 1 gallon or less Store in original container in a locked storage area in accessible to children. Do not reuse empty container. Wrap container and discard in the trash."*
3. Precautionary Statement should read: Corrosive. Causes irreversible eye damage and skin and burns. Harmful if swallowed or absorb through skin. Do not get in eyes , on skin, or on clothing. Wear protective eyewear, clothing, and gloves (goggles face shield, safety glasses and rubber gloves). Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco.
Remove contaminated clothing and wash before reuse.

SYMBOL	7510 (C)						
SURNAME	A Peters						
DATE	10/3/02						

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General Comments

Please submit a copy of your final printed label before distributing or selling the product bearing the revised labeling. If you have any questions regarding this letter, please contact Velma Noble at (703) 308-6233.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch1
Antimicrobial Divisions (7510c)

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BTC[®] 99 Industrial and/or Commercial Recirculating Cooling Water Tower Microbicide

Microbicide for industrial and/or commercial recirculating cooling water towers.

Helps keep water cooling tower systems clear and free of visible algal, bacterial, and fungal slimes.

ACTIVE INGREDIENT:

Didecyl dimethyl ammonium chlorides 50.0%

INERT INGREDIENTS: 50.0%

Total 100.0%

ACCEPTED
with COMMENTS
in EPA Letter Dated:
SEP 16 2002

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panels for additional precautionary statements.

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1839-129

EPA REG. NO. 1839-129
EPA EST. NO. 1839-IL-01

STEPAN COMPANY
22 West Frontage Road
Northfield, IL 60093

NET CONTENTS

DIRECTIONS FOR USE

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

BTC® 99 Industrial and/or Commercial Recirculating Cooling Water Tower Microbicide is designed to control algae and bacteria in cooling tower systems.

Initial Dose: Add 3.75 to 16 fluid ounces of this product per 1,000 gallons of water contained in the system to provide a concentration of 30 to 126 ppm of this product (15 to 63 ppm active quaternary). Repeat until control is evident. When system is in control, add:

Periodic Dose: Add 1.25 to 16 fluid ounces of this product per 1,000 gallons of water contained in the system (5 to 63 ppm active quaternary) every 7 days or sooner should visible growth appear. For best results, clean heavily contaminated systems before treatment with this product. If soap or anionic detergent is used, rinse thoroughly before charging with this product. Apply this product at a point in the system where uniform mixing will take place.

Do not be alarmed with the sudden appearance of organic debris in the system during the first week of operation. This is normal and is a good indication that this product has effectively penetrated and dislodged dead organic material which tenaciously adheres to metal and wooden surfaces as living matter. This debris should be removed from the system to avoid clogging of screens and pipes.

When this product is used as directed, it will aid in controlling the development of biomass deposits and algal slime formation which are unsightly, produce foul odors and which are often the cause of equipment breakdown and loss of cooling efficiency.

This product is compatible with virtually all corrosion inhibition additives, but should not be used in the presence of soap or other anionic detergents. This product at use-dilution is non-corrosive to inanimate hard surfaces.

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER

KEEP OUT OF REACH OF CHILDREN. Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles or face shield), clothing, and gloves when handling. May be fatal if swallowed. Harmful if absorbed through skin. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for 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 eye. Call a poison control center or doctor for treatment advice.

If on skin or clothing: Take off contaminated clothing. Rinse skin with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.

If swallowed: Call 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 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 by mouth-to-mouth, if possible. Call a poison control center ~~or doctor~~ for further treatment advice.

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:

HOT LINE NUMBER (Optional)

You may contact xxx/xxx-xxxx for emergency medical treatment information.

SEP 16 2002

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

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Fungicide, and Rodenticide Act as
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ENVIRONMENTAL HAZARDS

(Required for containers 5 gallons or greater)

This pesticide is toxic to fish. 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.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

PESTICIDE STORAGE - Store in a dry place no lower in temperature than 50°F or higher than 120°F.

CONTAINER DISPOSAL - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For containers 1 gallon or less: Do not reuse empty container. Wrap in newspaper and discard in trash.

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.