

AUG 19 2008

Mr. V Goncarovs
Regulatory Affairs Manager
Stephan Company
22 W. Frontage Rd.
Northfield, IL 60093

Subject: **50% BTC 1010 Water Treatment Microbiocide**
EPA Registration Number 1839-151
Application Dated May 21, 2008
Received Date May 22, 2008

Dear Mr. Goncarovs:

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

Proposed Amendment:

- Revised label to update the oil field section per cited in the DDAC RED

Labeling comments:

1. The "Gas Production/Transmission Pipelines and Systems" directions are incomplete because it does not include a dosage rate. Therefore, you must revise the directions to state the following:

"This product must be added at 6.5-96 oz per 1000 gallons of water (25-375 ppm active quaternary) via direct injection to a gas production or transmission pipeline to maintain 50-750 ppm of product."

2. The "Gas Storage Wells and Systems" directions are incomplete because it does not cite a use dilution rate. Therefore, you must revise the directions to state the following:

"Individual injection wells must be treated with sufficient quantify of this product by adding 57.5-173 oz per 1000 gallons of water (225-675 ppm active quaternary) to product a concentration of 450-1350 ppm of product...."

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

General Comments:

A stamped copy of the acceptable labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

Enclosure: Label

50% BTC[®] 1010

WATER TREATMENT MICROBIOCIDES

Water Treatment Microbiocide for Building and Industrial Cooling Towers,
Oil Field Water Flood or Salt Water Disposal Systems, Oil Drilling Muds/Packer Fluids,
Gas/Oil Recovery Injection Water Systems, Gas/Oil Fracturing Fluid Systems and
Gas/Oil Pipeline/System Maintenance

ACCEPTED
with COMMENTS
in EPA Letter Dated:
AUG 19 2008

ACTIVE INGREDIENT

Didecyl dimethyl ammonium chloride50.0%

INERT INGREDIENTS50.0%

Total.....100.0%

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **1839-151**

KEEP OUT OF REACH OF CHILDREN

DANGER

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 immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for 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 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.

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

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

See side (back) panel for additional precautionary statements.

EPA Reg. No. 1839-151

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.

50% BTC® 1010 Water Treatment Microbiocide is designed to control algae and bacterial slimes in recirculating cooling towers, oil field water flood, and salt water disposal systems, oil drilling muds/packer fluids, gas/oil recovery injection water systems, gas/oil fracturing fluid systems and gas/oil pipeline/system maintenance.

RECIRCULATING COOLING TOWERS

Initial Dose: add 6 ounces 50% BTC® 1010 per 1000 gallons of water contained in the system to provide a concentration of 23.5 ppm active quaternary. Repeat every 7 days or sooner should visible growth appear.

Periodic Dose: add 2 to 3 ounces of this product per 1000 gallons of water contained in the system (8 to 12 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 and/or preventing the development of unsanitary slime conditions that are unsightly, produce foul odors, and which are often the cause of equipment breakdown. 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 (8 to 12 ppm active quaternary) is non-corrosive to inanimate hard surfaces.

OIL FIELD WATER FLOOD OR SALT WATER DISPOSAL

(Do not apply in Marine and Estuarine Oil Fields.)

To control slime forming and sulfate reducing bacteria (*Desulfovibrio desulfuricans*) (this product or product name) must be added to a water flood system at a point of uniform mixing.

Initial Treatment: When the system is noticeably contaminated, add 50-750 ppm of (this product or product name) (25-375 ppm active quaternary) (6.5-96 ounces per 1000 gallons of flood water). Repeat until control is achieved.

Continuous Dose: Add (6.5-96 ounces per 1000 gallons of water) (4.75-71 gallons per 3000 barrels of water) (25-375 ppm active quaternary). Levels for effective control will vary depending on conditions at the site.

Intermittent Dose: Add 100-750 ppm of (this product or product name) (13-96 ounces per 1000 gallons of water) (9.5-71 gallons per 3000 barrels of water) (50-375 ppm active quaternary) for 4-8 hours per day, 1-4 times per week as needed to maintain control.

Add this product directly from the drum with the proper type of metering equipment.

DRILLING, COMPLETION, FRACTURING AND WORKOVER FLUIDS

To control slime forming and sulfate reducing bacteria (*Desulfovibrio desulfuricans*), (this product or product name) should be added to a drilling fluid system at a point of uniform mixing such as the recirculating mud tank.

Initial Treatment: Add 150-750 ppm of (this product or product name) (19.25-96 ounces per 1000 gallons of fluid) (14.25-71 gallons per 3000 barrels of fluid) (75-375 ppm active quaternary) to a freshly produced fluid dependent on the severity of the contamination.

Maintenance Dose: Maintain a concentration of 150-750 ppm of (this product or product name) by adding (19.25-96 ounces per 1000 gallons of fluid) (14.25-71 gallons per 3000 barrels of fluid) (75-375 ppm active quaternary) to freshly produced fluid, or as needed, depending on the severity of contamination.

GAS/OIL RECOVERY INJECTION WATER SYSTEMS

To control slime forming and sulfate reducing bacteria (*Desulfovibrio desulfuricans*) (this product or product name) must be added to an injection water system at a point of uniform mixing.

Initial Treatment: When the system is noticeably contaminated, add 50-750 ppm of (this product or product name) (25-375 ppm active quaternary) (6.5-96 ounces per 1000 gallons of flood water). Repeat until control is achieved.

Continuous Dose: Add (6.5-96 ounces per 1000 gallons of water) (4.75-71 gallons per 3000 barrels of water) (25-375 ppm active quaternary). Levels for effective control will vary depending on conditions at the site.

Intermittent Dose: Add 100-750 ppm of (this product or product name) (13-96 ounces per 1000 gallons of water) (9.5-71 gallons per 3000 barrels of water) (50-375 ppm active quaternary) for 4-8 hours per day, 1-4 times per week as needed to maintain control.

Add this product directly from the drum with the proper type of metering equipment.

PACKER FLUIDS

(This product or product name) must be added to a packer fluid at a point of uniform mixing like the recirculating holding tank. Add 150-750 ppm of (this product or product name) by adding (19.25-96 ounces per 1000 gallons of fluid) (14.25-71 gallons per 3000 barrels of fluid) (75-375 ppm active quaternary) to freshly produced fluid depending on the severity of contamination. Seal the packer fluid in the wall between the casing and the production tube.

GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS

(This product or product name) must be added via direct injection to a gas production or transmission pipeline to maintain 50-750 ppm of product (25-375 ppm active quaternary). The application should be conducted to ensure maximum distribution of (this product or product name) through the entire internal surface of the pipeline. To facilitate application, it may be desirable to dilute (this product or product name) with an appropriate solvent immediately before use. Injections must be done on a weekly basis at a minimum, or more frequently as needed to maintain control.

GAS STORAGE WELLS AND SYSTEMS

Individual injection wells must be treated with a sufficient quantity of (this product or product name) to produce a concentration of 450-1350 ppm of product (225-675 ppm active quaternary) when diluted by the water present in the formation.

PIPELINE PIGGING AND SCRAPING OPERATIONS

Add (this product or product name) to a slug of water immediately following the scraper (ideally this water volume can be kept to a minimum and contained between the scraper and the trailing pig). Sufficient (product or trade name) should be added to produce a concentration of 0.1-3% (0.1-3 gallons per 100 gallons of water) depending on the length of pipe and the severity of bio-fouling.

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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. Harmful if swallowed or absorbed 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.

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 - Do not reuse empty container. Triple rinse empty container with water. Return metal drum then offer for reconditioning or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers may be disposed of in a sanitary landfill, incinerated, or if allowed by local authorities, by burning. If burned stay out of smoke.

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.