UNITED JATES ENVIRONMENTAL PROTECTION AGENCY

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

MAY 2 8 2010

SUBJECT:

BTC 824 WT50 EPA Registration Number: 1839-185 Application Date: March 10, 2010 Receipt Date: March 11, 2010

Dear Mr. Isaac:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the conditions listed below:

Conditions

1. Revise the Precautionary Statements to include the following: "...soap and water after handling and before eating, drinking, using tobacco or using the toilet."

2. Revise the Environmental Hazards statement to include: "This pesticide is toxic to fish *and aquatic invertebrates*. Do not discharge..."

3. Revise the Container Disposal section to include the following information: "Offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning If burned, stay out of smoke."

The current rinsing instructions are incorrect for containers greater than 5 gallons. Delete the current rinsing instructions and add the following text for rinsing of containers greater than 5 gallons: "Triple rinse container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand

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EPA Form 1320-1A (1/90)

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UNITED STATES ENVIRONMENTAL PROTECTION SENCY

the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times."

4. Revise the Industrial and /Or Commercial Recirculating Cooling Water Towers: Slug or Intermittent Feeding section to include mandatory language as per PR Notice 2000-5 as follows: "This dose *is* repeated until control..." "...system *must* be treated before treatment is begun." "...This product (or product name) *is* applied when the system..." and "...bleed off valves *must* be closed to permit..."

5. Revise the Pulp and Paper Mills and Paper Manufacturing section to include mandatory language as per PR Notice 2000-5 as follows: ." "...This product (or product name) *is* used as a slimicide..." "...This product (or product name) *is* fed as early as..." "...Additions of this product (or product name) *are* made at a point..." "...Application of this product (or product name) *is* made at a point in the system where..." "...on wet lap or sheet pulp, this product (or product name) *is* applied to the dewatered pulp..."

6. Revise the pulp and paper slimicide application section to be in agreement with FAD-2 and other similar products for this use as follows: "This product (or product name) is to be applied *on a continuous basis* at a point in the..."

General Comments

A stamped copy of the accepted 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 concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,

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

7510P:T.Lantz:5/23/10:1839-185 accept label amend

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BTC[®] 824 WT50

For control of algae, algal, fungal and bacterial slimes in Industrial and/or Commercial Recirculating Cooling Water Towers and in Pulp, Paper Mills and Paper Manufacturing.

ACTIVE INGREDIENT:

Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈)	
dimethyl benzyl ammonium chloride	50.0%
INERT INGREDIENTS	<u>50.0%</u>
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN DANGER

SEE SIDE (BACK) PANEL(S) FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 1839-185 EPA EST. NO. 1839-IL-01

STEPAN COMPANY

22 West Frontage Road Northfield, IL 60093 USA

NET CONTENTS:

ACCEPTED with COMMENTS in EPA Letter Dated:

MAY 2 8 2010

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1839-185

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

THIS PRODUCT (OR PRODUCT NAME) IS A CATIONIC MATERIAL. DO NOT MIX WITH SOAP OR OTHER ANIONIC MATERIALS.

Do not use water containing residues from use of this product to irrigate crops for food or feed.

Use of the product in either public/municipal or single or multiple family private/residential potable/drinking water systems is strictly prohibited. Use of the product in any cooling water system that discharges effluent within ¼ mile of either a public/municipal or single or multiple family private/residential potable/drinking water intake is strictly prohibited.

INDUSTRIAL AND/OR COMMERCIAL RECIRCULATING COOLING WATER TOWERS: SLUG OR INTERMITTENT FEEDING

Initial Product Application

When growth is evident, apply 2.5 to 5.0 fluid ounces (19.5 ppm to 39 ppm) of this product (or product name) per 1000 gallons of contained water. This dose may be repeated until control is achieved. When heavy growth is present, system should be cleaned before treatment is begun.

- 1. **Dosing Location:** This product (or product name) is to be applied at a point in the system where it will be uniformly mixed, such as at the sump.
- Dosing Conditions: This product (or product name) should be applied when the system is in jeopardy of being affected or after cleaning systems where efficiency is already impaired. Tower bleed off valves should be closed to permit a retention time of 4 hours.

Subsequent Product Application

When microbial control is evident, apply 1.5 to 3.0 fluid ounces (12 ppm to 23 ppm) of this product (or product name) per 1000 gallons of contained water. The above directions should be followed once per week or as needed to maintain control.

PULP AND PAPER MILLS AND PAPER MANUFACTURING

Slimicide Application

This product (or product name) can be used as a slimicide in the manufacture of paper and paperboard that contacts food. Depending on the type of stock, quality of raw water, complexity of the system and degree of contamination, apply 0.4 to 80 pounds of this product (or product name) per ton (dry basis) of pulp or paper produced. If this product (or product name) is used to treat whitewater, alternatively apply 0.80 to 160 pounds of this product (or product name) per 100,000 gallons of whitewater to be treated (1.0 to 200 ppm product).

Dosing Application: This product (or product name) is to be applied at a point in the system where it will be uniformly mixed, such as at the suction side of the pump. This product (or product name) should be fed as early as possible in the system. Additions of this product (or product name) should be made at a point in the system where mixing action is good. Suitable sites are the hydrapulper, suction side of the machine chest or broke system pump. Badly fouled process systems must be cleaned before initial treatment.

Control Of Bacterial, Fungi/Mold & Algae On Pulp, Paperboard & Wet Lap

This product (or product name) is used to inhibit bacteria, fungi/mold and algae growth, which causes discoloration, odor and degradation in paper, paperboard or wet lap.

Application of this product (or product name) should be made at a point in the system where mixing action is good. Application can also be made at the size press or water box. Apply at a rate of 0.4 to 80 pounds of this product (or product name) per ton (dry basis) of pulp or paperboard produced.

Dosing Application: This product (or product name) may be drip fed continuously from the drum, diluted and showered to the wet sheet or fed by suitable pumps. For inhibition of bacteria, fungi/meld and algae growth which causes discoloration, odor and degradation on wet lap or sheet pulo, this product (or product name) should be applied to the dewatered pulp surface via applicator rolls or showers: Application can also be made at the size press or water box.

Stepan Company Northfield, IL 60093 1839-185

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled. May be fatal if swallowed. Harmful if absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wear protective eyewear (goggles, face shield or safety glasses). Wear protective clothing and rubber gloves. 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 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 person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a 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.

(Optional) HOT LINE NUMBER: You may also contact 1-XXX-XXXX for emergency medical treatment information.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

(The following label statement must be retained for container sizes of 5 gallons or more.)

ENVIRONMENTAL HAZARD

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 into 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

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. Store in tightly closed container in a secure area inaccessible to children.

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.

(For Industrial, Institutional, Commercial Products) CONTAINER DISPOSAL - Nonrefillable container. Do not reuse or refill this container. Office for recycling, if available Triple, rinse, container, promptly after, emptying, Triple, rinse, as follows: Empty the remaining contents, Intriapplication equipment or a mix tank and drain for 10 seconds after flow begins to drip. Fill container % full with water and recap. Shake for 10 seconds, Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

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