

AUG 26 2008

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

Subject: **BTC® 8358 WT80**  
EPA Registration Number 1839-187  
Application Dated May 28, 2008  
Received Date May 28, 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 36 oz. -108 oz per 1000 gallons of water (225-675 ppm active quaternary) to product a concentration of 281-844 ppm of product."

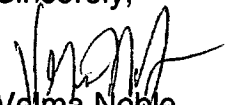
SYMBOL							
SURNAME							
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**General Comments:**

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

# BTC® 8358 WT80

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, Oil Field water Flood or Salt water Disposal Systems,  
Oil Drilling Muds/Packer Fluids, Gas Recovery Injection Water Systems and  
Gas/Oil Pipeline/Systems Maintenance

**ACTIVE INGREDIENT:**

Alkyl (50% C <sub>14</sub> , 40% C <sub>12</sub> , 10% C <sub>16</sub> )	
dimethyl benzyl ammonium chloride .....	80.0%
<b>INERT INGREDIENTS .....</b>	<b>20.0%</b>
<b>TOTAL</b>	<b>100.0%</b>

**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 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-XXX-XXXX for emergency medical treatment information.**

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

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

EPA REG. NO. 1839-187  
EPA EST. NO. 1839-IL-01

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**AUG 26 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. **1839-187**

**STEPAN COMPANY**  
22 West Frontage Road  
Northfield, IL 60093 USA

NET CONTENTS

### DIRECTIONS FOR USE

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 1.6-3.1 fluid ounces (12.5 -24 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.
2. **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 0.9-1.9 fluid ounces (7-15 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 0.25-50 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 0.50-100 pounds of this product (or product name) per 100,000 gallons of whitewater to be treated (0.6-127 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 hydropulper, 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 0.25-50 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/mold and algae growth which causes discoloration, odor and degradation on wet lap or sheet pulp, 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.

### 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 (4-60 ounces per 1000 gallons of water) (3-44 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 62.5-469 ppm of (this product or product name) (8-60 ounces per 1000 gallons of water) (6-44 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, 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 94-469 ppm of (this product or product name) (12-60 ounces per 1000 gallons of fluid) (9-44 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 94-469 ppm of (this product or product name) by adding (12-60 ounces per 1000 gallons of fluid) (9-44 gallons per 3000 barrels of fluid) (75-375 ppm active quaternary) to freshly produced fluid, or as needed, depending on the severity of contamination.

### 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 94-469 ppm of (this product or product name) by adding (12-60 ounces per 1000 gallons of fluid) (9-44 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 31-469 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 281-844 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 0.625-1.875% (0.08-1.875% gallons per 100 gallons of water) depending on the length of pipe and the severity of pipe-fouling.

**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. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

*(The following label statement must be retained for containers 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.

**CONTAINER DISPOSAL** – Do not reuse empty container. Triple rinse empty container with water. Return metal drum or 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 offered for recycling or reconditioning, or punctured and disposed of in sanitary landfill, incinerated, or if allowed by local authorities, by burning. If burned, stay out of smoke.

*For containers 1 gallon or less:* Do not reuse empty container (bottle, can, bucket). Wrap container and put in trash.

