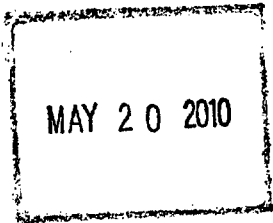


Thomas W. Isaac
Sr. Regulatory Specialist
Stepan Company
22 W. Frontage Rd.
Northfield, IL 60093



SUBJECT: BTC 8358 WT80
EPA Registration Number: 1839-187
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 1/4 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*

CONCURRENCES							
SYMBOL	7510P						
SURNAME	J. Isaac						
DATE	5/19/10						

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 page 2, Industrial and/or Commercial Recirculating Cooling Towers to include mandatory language as per PR Notice 2000-5 as follows: "...This dose is repeated until control..." , "...When heavy growth is present, system must be..." , "...This product (or product name) is applied when the system..." , "...Tower bleed off valves must be closed to..." and "...The above directions are followed once per week..."

5. Revise page 2, Pulp and Paper Mills to include mandatory language as per PR Notice 2000-5 as follows: This product (or product name) is used as a slimicide in... "..." This product (or product name) is fed as early as possible... Additions of this product (or product name) are made at a..."

6. Revise page 2, Control of Bacterial...on Pulp, Paperboard & Wet Lap to include mandatory language as per PR Notice 2000-5 as follows: "...Application of this product (or product name) is made at a point..." , "...This product (or product name) is drip fed..." , "...this product (or product name) is applied to the dewatered pulp..."

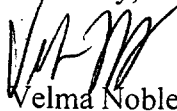
7. Revise page 3, Drilling Completion and Workover Fluids to include mandatory language as per PR Notice 2000-5 as follows: "...this product (or product name) is added to a drilling fluid..."

8. Revise page 3, Pipeline Pigging and Scraping Operations to include mandatory language as per PR Notice 2000-5 as follows: "...Sufficient (product or trade name) is added to produce..."

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,



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

7510P-T.Lantz.5/9/10.1839-187 accept label CONCURRENCES

SYMBOL								
SURNAME								
DATE								

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 ₁₄ , 40% C ₁₂ , 10% C ₁₆)	
dimethyl benzyl ammonium chloride	80.0%
INERT INGREDIENTS	<u>20.0%</u>
TOTAL	100.0%

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:

STEPAN COMPANY
22 West Frontage Road
Northfield, IL 60093 USA

MAY 20 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

1839-187

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 at 4-60 ounces per 1000 gallons of water (25-375 ppm active quaternary) via direct injection to a gas production or transmission pipeline to maintain 31-469 ppm of product. 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) by adding 36-108 ounces per 1000 gallons of water (225-675 ppm active quaternary) to produce a concentration of 281-844 ppm of product 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 bio-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.

(For Industrial, Institutional, Commercial Products)

CONTAINER DISPOSAL – Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.

Triple rinse container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after flow begins to drip. Fill container 1/4 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.