6836-79 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 17 2003

Mr. Robert Sloan Lonza Inc. 17-17 Route 208 Fair Lawn, NJ 07410

Subject:

3A

205MWater Treatment Microbiocide

EPA Registration No. 6836-79 Amendment Date: August 18, 2003 EPA Receipt Date: August 19, 2003

Dear Mr. Sloan.

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with the conditions listed below.

Update First Aid Statements per PR Notice 2001-1

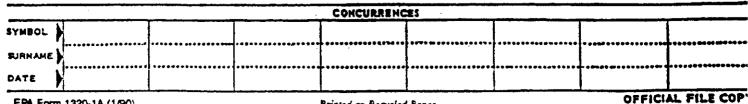
Conditions

Revise the label as follows:

1. Revise the "Precautionary Statements" to state:

> Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (goggles, safety glasses), protective clothing, and protective gloves (chemical or rubber). May be fatal if swallowed or inhaled. Do not breathe vapor. Wear a MSHA/NIOSH-approved dust/mist filtering respirator number TC-21C or a NIOSH approved respirator with any N, R, P, or HE filter. Harmful if absorbed through the skin. Wash thoroughly with soap and water after handling and before eating, drinking, and using tobacco. Remove contaminated clothing and wash before reuse.

Revise the "First Aid" statements by adding "If inhaled: Move person to fresh air. If 2. 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."



EPA Form 1320-1A (1/90)

Printed on Recycled Paper

3. Revise the "Directions" to state:

When used as directed, 205M Water Treatment Microbiocide helps to control algae and bacterial slime in industrial recirculating cooling water systems. Product addition must be made with a metering pump. Product may be fed continuously or on an intermittent basis depending on the degree of system fouling and retention time.

Initial Dose: Add 6 oz per 1,000 gallons of water (20 ppm active). Should the dosage not give satisfactory results, use 21 oz per 1,000 gallons of water. Repeat initial dose every seven days or increase the frequency if needed.

Heavily contaminated systems must be precleaned.

Maintenance Dose: Once control is achieved, add 2-3 oz per 1,000 gallons of water weekly or as needed to maintain control.

The product must be added at a point in the system where it will be uniformly mixed and distributed such as the tower sump.

- Delete the statement, "Dilute appropriate amount ...per gallon (at 20°c)." 4.
- 5. Revise the "Oil Field Water Flood or Salt Water Disposal Systems)" to state:

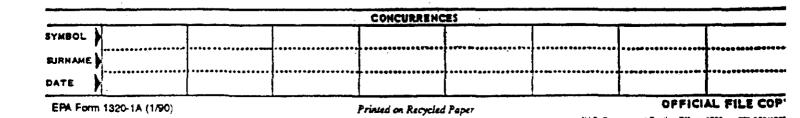
Product addition must be made with a metering pump. This product must be applied where it will dispense most rapidly and uniformly to the desired area of treatment. Product must be slug fed then fed continuously or on an intermittent basis depending on the degree of system fouling.

Heavily fouled system must be precleaned

Slug: Apply 1 ½ -6 gallons per 3000 barrels (5-20 ppm ai) of water for 4-8 hours per day until desired level of control is achieved. To maintain the system in an acceptable manner, utilize a continuous treatment with the microbiocide or apply intermittent doses.

Intermittent Feed: The frequency of intermittent doses will vary with individual systems. Apply 1 ½ -6 gallons per 3000 barrels (5-20 ppm ai) of water for 4-8 hours per day, one to four times a week as needed to maintain control.

Continuous Feed: Fouled systems must be slug treated to get initial control, followed by continuous treatment to maintain control. Apply 1 ½ oz - 3 gallons per 3000 barrels of water (5-10 ppm ai) continuously.



General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies 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 Jacqueline McFarlane at (703) 308-6416.

Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C)

| CONCURRENCES | | | | | | | | | |
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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Keep Out of Reach of Children. Corrosive. Causes severe eye and skin damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. Avoid contamination of food.

ENVIRONMENTAL HAZARDS

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 HAZARDS

DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME.

(If container size is 1 gallon or less, the following storage and disposal statements will be used:)

STORAGE AND DISPOSAL

Store in original container in areas inaccessible to children. Do not reuse empty container. Wrap container and put in trash.

(If container size is greater than gallon, the following storage and disposal statements will be used:)

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Do not store on side. Avoid creasing or impacting of side

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. disposal of excess pesticide, spray or mixture of 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

(Plastic containers): 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 way of smoke. (Metal Containers:) Triple rinse (or equivalent), then offer for recycling or reconditioning, or dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

205M WATER TREATMENT MICROBIOCIDE

Twin-Chain Quaternary **Ammonium Compound Concentrate** Water Treatment Microbiocide For Building and Industrial Cooling Towers and Oil Field Water Floor or Salt Water Disposal Systems

Active Ingredients:

| Alkyl (C ₁₄ , 50%; C ₁₂ , 40%; C ₁₆ , 10%) | |
|-----------------------------------------------------------------------------|-------|
| dimethyl benzyl ammonium chloride | 20.0% |
| Octyl decyl dimethyl ammonium chloride | 15.0% |
| Dioctyl dimethyl ammonium chloride | 6.0% |
| Didecyl dimethyl ammonium chloride | 9.0% |
| Other Ingredients: | |
| TOTAL: | |

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KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

IF IN EYES: Hold eve 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

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes.

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.

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

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

SEE LEFT PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No. 6836-79 EPA Establishment No. 6836-IL-1 Net Weight 425 lbs. Volume 55 gals.

Manufactured by. LONZA INC., 17-17 Route 203, Fair Lawn, NJ 07410

Nov 17 2003

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6836-79

205M Water Treatment Microbiocide EPA Reg. No. 6836-79 **EPA DRAFT LABEL DATED 5-15-03** 205M WATER TREATMENT MICROBIOCIDE will control algae and bacterial slimes found in re-circulating cooling tower waters and oil field water flood. 205M WATER TREATMENT MICROBIOCIDE helps clean and loosen slime debris from cooling and flooding system surfaces. When used in slug doses, no other microbiocide is required. 205M WATER TREATMENT MICROBIOCIDE is economical to use because it is concentrated. It should be handled with care.

Add 205M WATER TREATMENT MICROBIOCIDE directly from the drum with the proper type of metering equipment. This product weighs 7.89 lbs./gallon (at 20C).

DIRECTIONS FOR USE

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



To control algae and bacterial stimes, use 205M WATER TREATMENT MICROBIOCIDE as directed. For best results, slug feed. The frequency of addition of microbiocide needed depends on many factors. To optimize your use of 205M WATER TREATMENT MICROBIOCIDE, follow this procedure:

Re-circulating Cooling Towers

Initially use 6 fluid ounces per 1000 gallons of water to be treated (20 ppm active quaternary).

Should the above dosage not give satisfactory results, use 9 fluid ounces per 1000 gallons of water.

Repeat the initial dose every seven days or increase the frequency if needed.

 When the above treatment level is successful, use 2 to 3 fluid ounces per 1000 gallons of water to maximize efficiency. Repeat weekly as needed.

Should slime develop again, go back to initial dosage.

Cooling tower waters that are inherently low in algae growth and bacteria count may be adequately controlled by the lower range of these dosages; slug fed every seven days.

Dilute the appropriate amount of 205M WATER TREATMENT MICROBIOCIDE in 1 or 2 gallons of water, then add to the tower. Note, this product weighs 7.89 lbs. per gallon (at 20C).

Should tower be heavily fouled, a pre-cleaning is required.

Oil Field Water Flood or Salt Water Disposal Systems (Do not apply in Marine or Estuarine Oil Fields)

- For the control of slime forming and sulfate reducing bacteria in oil field water flood or salt water disposal systems, add 5-10 ppm (active) 205M WATER TREATMENT MICROBIOCIDE) 1½ 3 gallons per 3000 barrels of water) continuously. Levels for effective control will vary depending on conditions at the site.
- 2. For intermittent use, dose at a rate of 5-20 ppm (active) 205M WATER TREATMENT MICROBIOCIDE 1½ 6 gallons per 3000 barrels of water) for 4-8 hours per day, one to four times a week as needed to maintain control.