

PM 33

6836-239

11-29-99

1 of 4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 29 1999

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

Mailed To: Eliot Harrison, Agent for Lonza
Lewis & Harrison
122 C Street, N.W., Suite 740
Washington, D.C. 20001

RE: Isocil RW
EPA Reg. No. 6836-239
Your Amendment Dated 8/30/99

The Amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to make small changes to the dose rate numbers on the last accepted label, is acceptable with the following comments.

1. It appears that you propose to slightly decrease most of the fluid ounce numbers from those shown on the last accepted label dated 11/6/97. This is acceptable because you are apparently correcting the relationship errors on the last accepted label between the numbers shown for pounds and the numbers shown for fluid ounces of product. For example, in the "Water Cooling Towers" section, the 0.13 and 0.74 pounds of product doses were incorrectly shown on the last accepted label as equivalent to 1.9 and 11 fluid ounces. You corrected the fluid ounces to 1.6 and 9.1, respectively.

2. The additional proposed use directions and dosages for extreme mildew protection are also acceptable.

3. The "Water Cooling Towers" section is missing directions for continuous dosing using a metering pump. You do show continuous dosing directions for air washer systems which have similar operating characteristics. Many cooling towers use continuous dosing regimes so these directions should be added by Amendment in the near future. The directions for this section should also specify whether the product is for recirculating and/or once-through systems. See the enclosed FAD-1 guidelines for assistance.

4. If you desire, the "Air Washer" section could be combined with the "Water Cooling Towers" section because they are identical dose rates. You would only have to add additional words to the title and to the introductory paragraph. ~~This would provide more label space for additional uses.~~

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

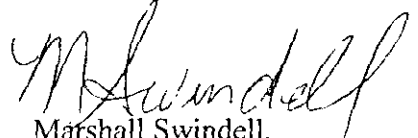
5. The "Pulp and Paper" use directions are missing directions for intermittent and continuous feed dosing regimes which are needed in some facilities. You can add these by Amendment. Please refer to the enclosed FAD-2 guidelines for assistance.

6. We have also enclosed the FAD-3 guidelines for oil recovery operations. You can amend your label using this information.

A copy of your submitted label stamped "Accepted With Comments" is enclosed for your records.

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,



Marshall Swindell,
Product Manager Team 33,
Regulatory Management Branch I
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

ACCEPTED
with COMMENTS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE

CAUSES EYE DAMAGE AND SKIN BURNS

PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS

HARMFUL IF INHALED

MAY BE FATAL IF SWALLOWED OR ABSORBED THROUGH THE SKIN

NOV 29 1999
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
6836-239

Do not get in eyes, on skin, on clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse. Avoid breathing vapor or mist.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. 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.

STORAGE AND DISPOSAL

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

The product as supplied evolves gas (largely carbon dioxide) slowly. To prevent buildup of pressure, the product is packaged in specially vented containers. Keep this product in the original container when not in use. Container must be stored and transported in an upright position to prevent spilling the contents through the vent.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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

METAL CONTAINERS: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

PLASTIC CONTAINERS: Triple rinse (or equivalent). Then offer for recycling or reconditioning, 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.

GENERAL

Consult Federal, State or local disposal authorities for approved alternative procedures.

ISOCIL RW

**INDUSTRIAL MICROBICIDE FOR USE IN
RECIRCULATING WATER COOLING TOWERS,
WOOD, MOLD AND MILDEW CONTROL,
PULP AND PAPER MILLS,
OIL FIELD INJECTION WATERS
AND AIR WASHER SYSTEMS.**

ACTIVE INGREDIENTS:

5-Chloro-2-methyl-4-isothiazolin-3-one 10.80%
2-Methyl-4-isothiazolin-3-one 3.83%

INERT INGREDIENTS: 85.37%

TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician immediately.

IF INHALED: Remove immediately to fresh air. If not breathing, apply artificial respiration. If breathing is difficult, give oxygen. Call a physician.

IF ON SKIN: Wash thoroughly with soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush with plenty of water for at least 15 minutes. Call a physician.

NOTE TO PHYSICIAN:

Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsions may be needed.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

Lot

Drum

MANUFACTURED FOR:
LONZA INC.
17-17 ROUTE 208
FAIR LAWN, NJ 07410

EPA Reg. No. 6836-239
EPA Est. No.

Net Contents

Info

DIRECTIONS FOR USE

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

Isocil RW aids in the control of bacterial, fungal and algal slimes in industrial recirculating cooling water systems, oil field injection waters, air washer systems, wood and wood products, and pulp and paper mills.

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS

To control bacteria, fungi and algae add Isocil RW to the tower basin, distribution box or other point that insures uniform mixing. The frequency of feeding and duration of the treatment will depend upon the severity of the problem. **BADLY FOULED SYSTEMS must be cleaned before treatment is begun.**

INITIAL DOSE

When the system is noticeably fouled, treat with 15 to 89 ppm of Isocil RW (2.25 to 13 ppm active), by adding 0.13 to 0.74 pounds or 1.6 to 9.1 fluid ounces of Isocil RW for every 1,000 gallons of system water. Repeat as often as necessary until microbial control is achieved.

SUBSEQUENT DOSE

When microbial control is evident, treat with 3.4 to 24 ppm Isocil RW (0.5 to 3.5 ppm active), by adding 0.03 to 0.2 pounds or 0.37 to 2.5 fluid ounces of Isocil RW for every 1,000 gallons of system water. Repeat dosage 2 to 3 times per week, or as frequently as needed to maintain biocontrol.

OIL-FIELD INJECTION WATERS

Isocil RW controls slime-forming and sulfate-reducing bacteria in oil and gas field water systems, including enhanced recovery injection, drilling, fracturing and completion fluids.

INITIAL DOSE

When the system is noticeably fouled, treat with 15 to 89 ppm of Isocil RW (2.25 to 13 ppm active), by adding 5.4 to 31 pounds or 0.6 to 3.5 gallons of Isocil RW for every 1,000 barrels of system water. Repeat slug dosage every three days, or as frequently as needed to achieve microbial control.

SUBSEQUENT DOSE

When microbial control is evident, treat with 3.4 to 24 ppm of Isocil RW (0.5 to 3.5 ppm active), by adding 1.2 to 8.4 pounds or 0.1 to 0.9 gallons of Isocil RW for every 1,000 barrels of system water. Repeat slug dosage every seven days, or as frequently as needed to maintain control.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV 29 1999

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

6836-239

AIR WASHERS SYSTEMS

Add Isocil RW to the air washer or chill water sump to insure uniform mixing. Use only in industrial airwasher systems that maintain effective mist eliminating components. **BADLY FOULED SYSTEMS must be cleaned before treatment is begun.**

INITIAL DOSE

When the system is noticeably fouled, treat with 15 to 89 ppm of Isocil RW (2.25 to 13 ppm active), by adding 0.13 to 0.74 pounds or 1.6 to 9.1 fluid ounces of Isocil RW for every 1,000 gallons of system water. Repeat as often as necessary until microbial control is achieved.

SUBSEQUENT INTERMITTENT OR SLUG DOSE

When microbial control is evident, treat with 3.4 to 24 ppm Isocil RW (0.5 to 3.5 ppm active), by adding 0.03 to 0.2 pounds or 0.37 to 2.5 fluid ounces of Isocil RW for every 1,000 gallons of system water. Repeat dosage weekly, or as frequently as needed to maintain biocontrol.

SUBSEQUENT CONTINUOUS FEED DOSE

When microbial control is evident, treat with 3.4 to 24 ppm Isocil RW (0.5 to 3.5 ppm active), by adding continuously 0.03 to 0.2 pounds or 0.37 to 2.5 fluid ounces of Isocil RW for every 1,000 gallons of system makeup water.

WOOD AND WOOD PRODUCTS

Isocil RW is recommended for the protection of wood and wood products such as landscape timbers, fences, posts, pilings, cross ties, decks, and similar exterior structures from mold and mildew. As a pressure treatment for mold and mildew control for southern yellow pine hemlock, ponderosa pine and other soft woods, treat with 27 to 86 ppm of Isocil RW (4.0 to 12.6 ppm active), by adding 0.23 to 0.72 pounds or 2.8 to 8.9 fluid ounces of Isocil RW for every 1,000 gallons. Thoroughly wet and allow to dry. A single application will provide protection for 12 weeks. Under extreme mildew conditions, treat with 160-330 ppm (24 to 48 ppm active) by adding 1.4 to 2.7 pounds or 17-33 fluid ounces of Isocil RW for every 1,000 gallons of wood treatment solution. Thoroughly wet and allow to dry. A single application will afford protection for 12 weeks.

PULP AND PAPER MILLS

Add Isocil RW to a point in the system, such as the Beater, Hydropulper, or Fan or Broke storage pumps, that insures uniform mixing. **BADLY FOULED SYSTEMS must be cleaned before treatment is begun.**

DOUSAGE

Add 0.05 to 0.15 pounds of Isocil RW per ton (dry basis) of pulp or paper produced as a slug dose. Repeat as often as necessary.

Isocil RW weighs 10.4 pounds per gallon.

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7/20/99