

8540-3

04/29/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 29 2010

David Grede  
EHS Manager  
Garratt-Callahan Company  
50 Ingold Road  
Burlingame, CA 94010-2206

Subject: **Formula 30-A**  
EPA Registration Number 8540-3  
Application Dated January 21, 2010  
EPA Received Date February 2, 2010

Dear Mr. Grede:

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:**

- Update Container Disposal Statement per PR notice 2007-4
- Revise Label

**Label comments:**

1. Under the product name, delete the term "Industrial" and replace it with "recirculating".
2. Revise the "PRECAUTIONARY STATEMENT" to read as follows:

DANGER, KEEP OUT THE REACH OF CHILDREN. Corrosive, causes irreversible eye damage and skin burns. Harmful if swallow or inhaled. Do not get in eyes, on skin, or on clothing, wear appropriate protective eyewear such as goggles, face shield, or safety glasses, protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

**CONCURRENCES**

SYMBOL							
SURNAME							
DATE							

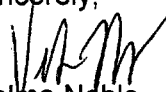
3. Under "ENVIRONMENTAL HAZARDS" revise the 1<sup>st</sup> statement to read "This product is toxic to fish, aquatic invertebrates, oyster, and shrimp".
4. Under the "Directions For Use", revise the third claim under the "Directions for Use" by delete the word "should" and replace with "must", to be in compliance of PR notice 200-5, Mandatory Labeling.
5. Revise last statement in 2<sup>nd</sup> paragraph for step 2 of directions to be in compliance with PR Notice 2000-5, Mandatory labeling be deleting "should" and state "must".
6. Under "Storage and Disposal", revise the last sentence under Pesticide Storage by deleting the word "should" and replace with "must".
7. Under the "Residue Removal", revise the last sentence must read "Repeat procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

**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.

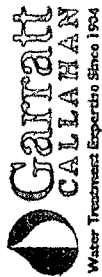
Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224 or Velma Noble at (703) 308-6233.

Sincerely,



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

Enclosure: stamped label



Water Treatment Specialist Since 1964

# FORMULA 30-A

WATER TREATMENT MICROBICIDE FOR BUILDING AND INDUSTRIAL COOLING TOWERS

ACTIVE INGREDIENTS:

ALKYL (60%, C14, 40%, C12, 10%, C16) DIMETHYL BENZYL AMMONIUM CHLORIDES.....	7.5%
INERT INGREDIENTS.....	92.5%
TOTAL.....	100.0%

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

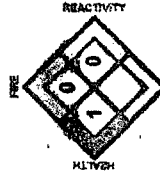
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>Hold eye open and flush slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue flushing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF INHALED</b>	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>

**HOT LINE NUMBER**  
You may contact the Poison Center at 1-800-422-1222 for emergency medical treatment information.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. You may also call 1-800-422-6711 day or night for emergency medical treatment information.

**NOTE TO PHYVICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measure against circulatory shock, respiratory depression, and convulsion may be needed.

See Side Panel For Additional Precautionary Statements



PRODUCT NO. 0279018  
NET WEIGHT 440 LBS. (83 GAL.)

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

APR 29 2010  
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 8540-1-3

Main Office: 50 Ingold Road, Burlingame, CA 94010 (650) 697-5813 FAX (650) 692-6588  
Plants: Addison, IL Atlanta, GA Edison, NJ Dallas, TX Burlingame, CA  
www.g-c.com

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
**DANGER**

**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 product 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.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.  
GARRATT-CALLAHAN FORMULA 30-A will aid in controlling algae and bacterial slime found in industrial recirculating cooling tower waters.  
GARRATT-CALLAHAN FORMULA 30-A helps clean and loosen slime deposits from cooling system surfaces. Proper control of such growth is important in the general maintenance of the system.  
GARRATT-CALLAHAN FORMULA 30-A is a concentrated formula and should be handled with care. Please read use directions below.

To control algae and bacterial slime, use GARRATT-CALLAHAN FORMULA 30-A as directed. For best results, slug feed. The frequency of addition of microbicide needed depends on many factors. To optimize your use of GARRATT-CALLAHAN FORMULA 30-A follow this procedure.

1. Initially use 1.8 pints per 1000 gallons of water to be treated. Should the above dosage not give satisfactory results, use 2 pints per 1000 gallons of water. Repeat the initial dose every seven days or increase the frequency if needed.

2. When the above treatment level is successful, use 1 to 1.5 pints per 1000 gallons of water to maintain 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 bacterial count may be adequately controlled by the lower range of these dosages; slug feed every seven days.

Disperse the appropriate amount of GARRATT-CALLAHAN FORMULA 30-A in 1 or 2 gallons of water then add to the sump of the tower. Should tower be heavily fouled, a prewashing is required.

### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Avoid freezing, excessive hot or excessive light, especially direct sunlight. Store in a cool, well ventilated location. If heating is necessary to prevent freezing, care must be taken to prevent overheating. Average product temperature should be maintained below 110°F. Temperature monitoring is recommended. Drums should be opened in well-ventilated areas. Leaking or damaged drums should be placed in overpack drums for management. Spills should be absorbed and properly disposed.

**PESTICIDE DISPOSAL:** Pesticide wastes may be 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 HANDLING:

**NONREFILLABLE CONTAINER:** (Less than or equal to 5 gallon container): Do not reuse or refill this container.

**RESIDUE REMOVAL:** Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/2 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. Offer for recycling if available.

**NONREFILLABLE CONTAINER:** (Greater than 5 gallon container): Do not reuse or refill this container.

**RESIDUE REMOVAL:** Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/2 full with water. Recap and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand 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. Offer for recycling if available.

EPA REG. NO. 8540-3  
EPA EST. NO. 8540-1-CA [ ]  
8540-1-TX [ ]  
8540-1-GA [ ]  
8540-1-IL [ ]  
8540-1-AJ [ ]

MANUFACTURED BY: GARRATT-CALLAHAN COMPANY  
MADE IN USA  
REV. 1/19/2010