C 12/16/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

David Grede EH&S Manager Garratt-Callahan Company 50 Ingold Road Burlinggame, CA 94010 OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

DEC 16 2010

Subject: Formula 30-A EPA Registration No.8540-3 Amendment Date: Sept 15, 2010 EPA Receipt Date: Sept 20, 2010

Dear Mr. David Grede

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with comments for the following reasons.

Proposed Amendment

Adding New Label Comments Revising the Storage and Disposal Section

Major Deficiencies

2) Revise the Directions for Use section to clearly define the dosage rates and methods of application when using this produce, so that it is clear to the user. You can find the guidance for these revisions to the label in the Agency's FAD-1 under labeling for Directions for Use instructions.

Other Deficiencies

1) In the section labeled Environmental Hazards revise this section by deleting the second sentence which begins with "Do not apply (or use).....surface water"

General Comments

A stamped copy of the 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 Velma Noble at (703) 308-6233

Sincerely,

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



FORMULA 30-A

WATER TREATMENT MICROBIOCIDE FOR BUILDING AND RECIRCULATING COOLING TOWERS

ACTIVE INGREDIENTS:	
ALKYL (50%, C14, 40%, C12, 10%, C16) DIMETHYL BENZYL AMMONIUM	
CHLORIDES	7.0%
INERT INGREDIENTS	93.0%
TOTAL	

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID		
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 INHALED	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a polson control center or doctor for further treatment advice. 	
IF SWALLOWED	Call a poison control center or doctor immedaltaly 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.	
You may contr information.	HOT LINE NUMBER act the Poison Center at 1-800-222-1222 for emergency medical treatment	
Have the prod	uct container or label with you when calling a Polson Control Center or	

doctor, or going for treatment. You may also call 1-303-623-5716 day or night for emergency medical treatment information. NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric

lavage. Measures against circulatory shock, respiratory depression, and convulsion may be needed

See Side Panel For Additional Precautionary Statements



PRODUCT NO. 0279018 NET WEIGHT 440 LBS. (53 GAL.)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

DANGER, KEEP OUT OF REACH OF CHILDREN. Corrosive, causes irreversible eve damage and skin burns. Harmful if swallowed or inhaled. Do not get in eyes, on skin, or on clothing, wear appropriate protective evewear such as goggles, face shield, or safety glasses, protective clothing and rubbler gloves. Wash thoroughly with soap and direct sunlight. Store in a cool, well ventilated location. If heating is necessary to water after handling and before eating, drinking, chewing gum, using tobacco or using prevent freezing, care must be taken to prevent overheating. Average product the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic invertebrates, ovster, and shrimp. 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 slimes found in industrial recirculating cooling tower waters.

GARRATT-CALLAHAN FORMULA 30-A helps clean and loosen slime debris from cooling system surfaces. Proper control of such growth is important in the general maintenance of the system.

GARRATT-CALLAHAN FORMULA 30-A is in a concentrated formula and must be handled with care. Please read use directions below.

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

1. Initially use 1.5 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 plnts 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 bacterial count may be adequately controlled by the lower range of these dosages; slug fed every seven days.

Dilute 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 precleaning is required.



DEC 1 6 2010

Under the Federal Insecticide, Functionde, and Rodenticide Act as amended, for the pesticide, registered under ÉPA Reg. No. 8540-3

Main Office: 50 Ingold Road, Burlingame, CA 94010 (650) 697-5811 FAX (650) 692-6098

Plants: Addison, IL Atlanta, GA Edison, NJ Dallas, TX Burlingame, CA

STORAGE AND BISPOSAL

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

PESTICIDE STORAGE: Avoid freezing, excessive heat or exposure to light, especially 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 must 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:

REV. 8/26/2010

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 ¼ 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 procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

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 ¼ 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 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 procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

EPA REG. NO.	8540-3		
EPA EST. NO.	8540-CA-1	1	
	8540-TX-1	ť	
	8540-GA-1	Ţ	
	8540-IL-1	Ţ	
	8540-NJ-1	£	•

MANUFACTURED BY: GARRATT-CALLAHAN COMPANY

MADE IN USA