

4/18/2011

Mr. David Grede
EH&S Manager
50 Ingold Road
Burlingame CA 94010

APR 18 2011

Subject: Formula 35
EPA Registration Number: 8540-13
Amendment Date: January 13, 2011
EPA Receipt Date: January 20, 2011

Dear Mr. Grede:

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:

- Modification of incorporated comments and suggestions provided in the letter dated December 17, 2010.

Conditions:

Revise the label as follows:

- For DIRECTION FOR USE section please explain why the product is diluted? If the product is diluted explain when it is appropriate.
- For DIRECTION FOR USE section please correct the language for INITIAL DOSE from "Add 12-16 fl. oz of Formula 35 per 1000 gallons (90-135 ppm)..." to **(90-135 ppm of this product per 1 gallon)...**
- For SUBSEQUENT DOSE please correct the language "Add 4-6 fl. oz of Formula 35 per 1000 gallons (30-45 ppm)..." to **(30-45 ppm of this product per 1 gallon)...**
- For PESTICIDE STORAGE section please change an advisory language

~~should be~~ for mandatory **must be** (3 times).

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

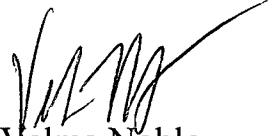
- Change the first statement in PESTICIDE DISPOSAL section to read "Pesticide wastes may be *acutely* hazardous".

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 Emilia Oiguenblik at (703) 347- 0199 or Velma Noble at (703) 308-6233.

Sincerely,



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



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

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

STORAGE AND DISPOSAL

FORMULA 35

TWIN-CHAIN QUATERNARY AMMONIUM COMPOUND CONCENTRATE WATER TREATMENT MICROBICIDE FOR BUILDING AND RECIRCULATING COOLING TOWERS.

ACTIVE INGREDIENTS:	
DIDECYL DIMETHYL AMMONIUM CHLORIDE	25.0%
INERT INGREDIENTS	75.0%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

IF IN EYES	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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 poison control center or doctor for further treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> 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.

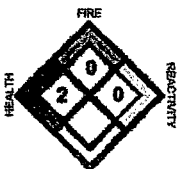
HOT LINE NUMBER

You may contact the Poison Center at 1-800-222-1222 for emergency medical treatment information.

Keep the product container or label with you when calling a Poison Control Center or doctor, 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.

See Side Panel For Additional Precautionary Statements



PRODUCT NO. 0315028
NET WEIGHT 112 LBS. (50.8 KG)

DANGER

DANGER, KEEP OUT OF REACH OF CHILDREN. Corrosive, causes irreversible eye damage and skin burns. Harmful if swallowed 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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic invertebrates, oyster, and shrimp. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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.

DIRECTIONS FOR USE

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

Formula 35 is used to reduce and control algae and bacterial slimes found in industrial and commercial recirculating cooling tower water systems. Formula 35 aids in cleaning and loosening slime debris from cooling system surfaces. Proper control of microbiological growth is important for the general maintenance of a system.

Formula 35 may be added neat or diluted at a convenient point where there is uniform mixing, such as the tower sump or recirculating water line. If dilution is necessary, dilute with water an appropriate amount of Formula 35 in a designated feed tank prior to feeding. Preferably, use an appropriately sized dosing pump to feed product to the system.

For best results, feeding Formula 35 on an intermittent/slug-dose basis is recommended. Feed according to the following dosages.

INITIAL DOSE: Heavily fouled systems must be manually cleaned prior to use of Formula 35. Add 12 - 18 fl oz of Formula 35 per 1000 gallons (90 - 135 ppm) of water to be treated. Repeat as needed until control is achieved.

SUBSEQUENT DOSE: Once system is clean and control is achieved, add a maintenance dose of 4 - 8 fl oz of Formula 35 per 1000 gallons (30 - 45 ppm) of water to be treated. Cooling tower water systems that are inherently low in algae growth and bacterial count may be adequately treated by the lower range of these dosages. The frequency of addition of Formula 35 will depend on various system operating parameters and degree of contamination. Feed Formula 35 as needed to maintain control.

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

PESTICIDE STORAGE: Avoid freezing, excessive heat or exposure to 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 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:

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 1/4 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. 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 1/4 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 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.	8540-13
EPA EST. NO.	8540-CA-1 []
	8540-TX-1 []
	8540-GA-1 []
	8540-IL-1 []
	8540-NJ-1 []

MANUFACTURED BY GARRATT-CALLAHAN COMPANY

REV 1/11/2011

MADE IN USA

RECORDED
with COMMENTS
in EPA Letter Dated:
APR 18 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. **8540-13**

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