Mr. David Grede Garratt-Calahan Company EH&S Manager 50 Ingold Road Burlingame CA 94010

AUG -9 2011

Subject:

Formula 35

EPA Registration Number: 8540-13 Amendment Date: June 9, 2011 EPA Receipt Date: July 11, 2011

Dear Mr. Grede:

This letter acknowledges receipt of the notification identified above submitted under provisions of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) as amended and PR Notice 98-10.

Clarification of information on Initial and Subsequent dose to provide active ingredient concentration

Based on a review of the submitted information, this notification is acceptable. Your proposed changes will be made part of the record for this file.

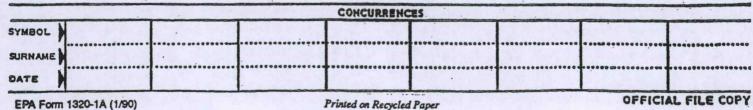
## **General Comments**

Should you have any questions concerning this letter, please contact Emilia Oiguenblik at (703) 347-0109 or Velma Noble at (703) 308-6233.

Sincerely,

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510P)



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Please read instructions on reverse before completing form	_	Form Ann	(	No. 2070-	0000	Print Form.	
United St Environmental Prote Washington, D		R	egistratio mendmei other	n OP	P Identifier Number		
Applic	cation for F	Pesticide - Sec	tion I				
1. Company/Product Number 8540-13	2. EPA Product Manager Velma Noble  3. Proposed Classification						
4. Company/Product (Name) Formula 35	PM# X None Restricted						
5. Name and Address of Applicant (Include ZIP Code)  Garratt-Callahan Company  50 Ingold Road  Rurlingame CA 94010  Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No.  Product Name						
	Sec	tion - II		,			
Amendment - Explain below.  Resubmission in response to Agency letter dated	Final printed labels in response to Agency letter dated "Me Too" Application.  Other - Explain below.						
Clarification of information on Initial and Subsequent dose paragraphs to provide active ingredient concentration, as requested in a telephone call with Tracy Lantz on June 9, 2011.  Section - III							
1. Material This Product Will Be Packaged In:				···			
Child-Resistant Packaging  Yes*  X No  * Certification must be submitted  Unit Packaging  Yes  X No  If "Yes" Unit Packaging wgt.	er If "Yes			2. Type of Container  Metal  Plastic Glass Paper Other (Specify)			
	(s) Retail Contain 55, 275 gallon	(X) On Lobel				ing product	
6. Manner in Which Label is Affixed to Product Adhesive backed label  Lithograph Paper glued Stenciled  Other							
Section - IV							
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)						ication.)	
Name David W. Grede Title EHS M		nager			Felephone No. (Include Area Code)		
Cer I certify that the statements I have made on this for I acknowledge that any knowingly false or misleadir both under applicable law.					te.	ete Application legelved (Stamped)	
2. Signature FWH-L	<b>3. Title</b> EHS Mai	nager			; ( ( ) ( ) ( ; (	( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (	
4. Typed Name David W. Grede	<b>5. Date</b> Jun 9, 2	2011				( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (	

## CERTIFICATION STATEMENT FOR 35 Submission

"Notification of label change per PR Notice 1998-10. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. Update to Storage and Disposal section only. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

2/27/11



## **FORMULA 35**

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

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

## KEEP OUT OF REACH OF CHILDREN DANGER

	FIRST AID
IF IN EYES	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
IF ON SKIN OR CLOTHING	<ul> <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>
IF INHALED	<ul> <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>
IF SWALLOWED	<ul> <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 voniting 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>
	LOT INE NIMBED

HOT LINE NUMBER
You may contact the Poison Center at 1-800-222-1222 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 1-303-623-6716 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 Present onary Statements



PRODUCT NO. 0315036

NET WEIGHT 210 LBS. (30 GAL.)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

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

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

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 necess safety glasses, protective clothing and rubbler gloves. Wash throughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using damag 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 deadning of equipment or disposal of washes. Do not displange effluent containing this product linfo 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 Epp.

**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. Add Formula 35 at a convenient point where there is uniform mixing, such as the tower sump or recirculating water line. 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 (23 - 34 ppm active) 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 - 6 fl oz of Formula 35 per 1000 gallons (8 - 11 ppm active) 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 36 will depend on various system operating parameters and degree of contamination. Feed Formula 35 as needed to maintain control.

DESTICIDE STORAGE: Avoid freezing expecsive heat or everyging to light

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

PESTICIDE DISPOSAL: Pestioide wastes may be acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal L 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 6 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 \( \lambda \) 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 contains into application equipment or a mix tank. Fill the container is fall 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 levelling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

EPA EST. NO. 8640-13

EPA EST. NO. 8640-CA-1 [
8640-TX-1 [
8640-L1-1 [
8640-L1-1 [

MANUFACTURED BY GARRATT-CALLAHAN COMPANY

REV 6/10/2011

MADE IN USA

NOTIFICATION
Date Reviewed: 8/9/11