

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 3 2002

Mr. Larry Mackson
Sungro Chemicals Inc.
P.O. Box 24632
Los Angeles, CA 90024

Subject: Purge
EPA Registration No. 11474-14
Amendment Date: January 4, 2002
EPA Receipt Date: February 4, 2002

Dear Mr. Mackson,

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- Update label per PR Notices 2001-1 and 2001-6

Conditions

Revise the label as follows:

1. Based on substantially similar products' data, this product's acute toxicology profile is as follows :

Acute Oral Toxicity	III
Acute Dermal Toxicity	cite-all -> IV
Acute Inhalation Toxicity	waived
Primary Eye Irritation	I
Primary Skin Irritation	I
Dermal Sensitization	Non-sensitizer

The "Precautionary Statements" must be revised in accordance with the Label Review Manual, 2nd Edition.

Causes irreversible *eye damage* and *skin burns*. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, rubber gloves, and protective clothing. *May be harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or smoking tobacco. Remove contaminated clothing and wash before reuse.*

CONCURRENCES

Please Note: Once your product's active ingredient, didecyl dimethyl ammonium chloride, has been re-registered by the Agency, you will be required during Product Re-registration to address the acute toxicology and product chemistry data requirements to maintain your product's registration.

2. Since this product is sold in 5, 30, and 55 gallon containers, the "Environmental Hazards" statements must be revised to state: (Refer to PR Notice 95-1 for guidance)

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 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.

3. The proposed "Disposal" instructions are unacceptable. PR Notice 2001-6 is for residential/homeowner use pesticides. Since this product is sold exclusively to the commercial and industrial markets, you must revise the Storage and Disposal Statements to comply with PR Notice 83-3 by stating the following:

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray, or mixture of 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.

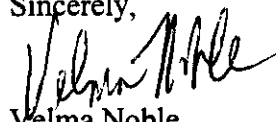
Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If you have any questions regarding this letter, please contact Jacqueline McFarlane at (703) 308-6416.

Sincerely,



Velma Noble

Product Manager (31)

Regulatory Management Branch I

Antimicrobials Division (7510C)

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

Corrosive. Causes severe eye damage and skin irritation. Do not get in eyes, on skin or in clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. Avoid contamination of food.

FIRST AID:

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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 with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If swallowed: 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.

If inhaled: Move person to fresh air. If person is not breathing, call 9-1-1 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.

Questions? 1-800-463-9179 or call poison control center.

NOTE TO PHYSICIAN:

Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge treated effluent into lakes, streams or ponds.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a dry place no lower in temperature than 50°F or higher than 120°F.

DISPOSAL INSTRUCTIONS:

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PURGE

WATER TREATMENT MICROBIOCIDES

**Twin-Chain Quaternary Ammonium
Compound Concentrate
Water Treatment Microbicide
For Building and Industrial Cooling Towers**

ACTIVE INGREDIENTS:

Didecyl dimethyl ammonium chloride	10.0%
Inert Ingredients:	90.0%
TOTAL	100.0%

DANGER

KEEP OUT OF REACH OF CHILDREN

See Other Precautions On Side Panel.

E.P.A. EST. NO. 11474CA01 E.P.A. REG. NO. 11474-14

Manufactured by:
SUNGRO CHEMICALS, INC.
P.O. Box 24632
Los Angeles, Ca. 90024
(213) 747-4125

NET CONTENTS _____ GALLONS (_____ LITERS)

ACCEPTED
with COMMENTS
in EPA Letter Dated:
MAY 3 2002

Under the F. Deterioration Act,
Registration, and the F. Deterioration Act as
amended, for the pesticide,
registered under EPA Reg. No. 11474-14

DIRECTIONS FOR USE

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

To control algae and bacterial slimes, use PURGE WATER TREATMENT MICROBIOCIDES as directed. For best results, slug feed. The frequency of additional of microbicide needed depends on many factors.

To optimize your use of PURGE WATER TREATMENT MICROBIOCIDES, follow this procedures.

1. Initially use One quart to 1,000 gallons of water to be treated (20 ppm active quaternary). Should the above dosage not give satisfactory results, use 1-1/2 quarts per 1,000 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 2/3 to 1 pint per 1,000 gallons of water to maximize efficiency. Repeat weekly as needed. Should slime develop again, go back to initial dose.

Cooling towers that are inherently low in algae growth and bacteria count may be adequately controlled by the lower range of these dosages, slug fed every seven days.

Dilute the appropriate amount of PURGE WATER TREATMENT MICROBIOCIDES in 1 or 2 gallons of water, then add to the sump of the tower.

**SHOULD TOWER BE HEAVILY FOULED, A
PRECLEANING IS REQUIRED**

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