

21 NOV 1984

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Guardian-Ipco, Inc.  
6606 Cahaba Valley Road  
Birmingham, AL 35243

Gentlemen:

Subject: Guardian-Ipco #91 Microbiocide  
EPA Registration No. 11743-8  
Your Submission Dated September 21, 1984

We have no objection to the additional product application of Drilling Fluids, Petroleum Secondary Recovery and Cutting Fluids. Also, the proposed pesticide and container disposal instructions are in compliance with FR Notice 83-3 and are acceptable.

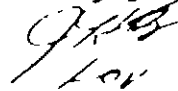
However, the following label changes must be made.

The correct spelling of the active ingredient is "2-(Thiocyanomethylthio) benzothiazole."

The environmental hazard statement should read as follows:

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish. Do not use in offshore or estuarine drilling operations. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, canals, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Sincerely yours,



John H. Lee  
Product Manager (31)  
Disinfectants Branch  
Registration Division (TS-767C)

JOB-50633:John Lee:CBI-1:KIM:Kendrick:898-1270:11/15/84:Del.11/27/84

CONCURRENCES

SYMBOL							
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# GUARDIAN-IPCO #91 MICROBIOCIDES

with COMMENTS  
in EPA Letter Dated

ACTIVE INGREDIENT:	NOV 21 1984
2-(Thiocyanomethylthio)benzothiazole	30%
INERT INGREDIENTS	70%

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER:** Causes irreversible eye damage. Causes skin irritation. This product may cause allergic reactions. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**STATEMENT OF PRACTICAL TREATMENT:** If in eyes, flush with plenty of water. Get medical attention. If on skin, wash with plenty of soap and water. Get medical attention. If swallowed, drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Get medical attention.

**Note to physician:** Probable mucosal damage may contraindicate gastric lavage.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish. Do not use in offshore or near-shore drilling operations. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with NPDES Permit. For guidance, contact the regional office of the Environmental Protection Agency.

**PHYSICAL AND CHEMICAL HAZARDS:** Do not use or store near heat or open flame.

### DIRECTIONS FOR

It is a violation of Federal law to use this product labeling.

**COOLING TOWERS:** Guardian-IPCO #91 Microbiocides protect wood against soft or surface rot and internal or dry rot. Use a dispersion containing 0.5 to 0.7% #91 Microbiocides on wood surfaces. The amount applied should provide 0.6 to 0.8 lb of #91 Microbiocides per 100 sq ft of wood surface. Soft or surface rot can also be inhibited by adding #91 Microbiocides to the recirculating cooling water. The dosage should provide 1.25 lb of #91 Microbiocides per 1000 gal of water. Dosage should be stopped for 4 to 6 hr. after treatment. The system should be cleaned every four months.

**COOLING WATER:** Guardian-IPCO #91 Microbiocides protect wood and fungi in industrial recirculating cooling water systems. The system should be cleaned thoroughly to remove old #91 Microbiocides and other deposits. System should then be drained and treated with an initial dose of 0.6 to 3.7 fl. oz. of #91 Microbiocides per 1000 gal of water. Subsequent additions of 0.2 to 1.2 fl. oz. per 1000 gal of water every 30 days, depending on amount of bleedoff and severity of fouling.

**DRILLING FLUIDS:** To inhibit bacterial and fungal degradation of wood in the drilling of wells, #91 Microbiocides is incorporated into the drilling fluid at a concentration of 0.05 to 0.25% based on the total wet weight of the fluid.

**PETROLEUM SECONDARY RECOVERY:** Guardian-IPCO #91 Microbiocides control sulfate-reducing bacteria, slime-forming bacteria, and other microorganisms in water-disposal systems and other petroleum operations. Rates of 0.2 to 3.7 fl. oz. of #91 Microbiocides per 1000 gal of water can be made continuously or intermittently by means of injection pumps and injectors.

**Method:** When system is noticeably fouled, add 0.6 to 3.7 fl. oz. of #91 Microbiocides per 1000 gal of water continuously until desired degree of control is achieved. **Intermittent or Slug Method:** When system is noticeably fouled, add 0.6 to 3.7 fl. oz. of #91 Microbiocides per 1000 gal of water 2 to 4 times per week, or as needed to maintain control.

**CUTTING FLUIDS:** Guardian-IPCO #91 Microbiocides inhibit bacterial and fungal degradation of water-based and water-soluble cutting fluids used in metalworking operations. It should be added to the cutting fluid that will provide 2.5 to 250 parts per million #91 Microbiocides in solution with water. #91 Microbiocides can be added to the concentrate before dilution at a rate of 125 to 1250 parts per million the required concentration in the diluted fluid.

### STORAGE & DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **PESTICIDE STORAGE:** Do not expose to extreme temperatures. Drums should be opened in well-ventilated areas. Leaking or damaged drums should be disposed of in accordance with local, state, or federal regulations. Spills should be absorbed in sawdust or similar material. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. If they cannot be disposed of by other means, they must be disposed of by a qualified person in accordance with local, state, or federal regulations. If these regulations do not exist, contact your State Pesticide or Environmental Control Agency for guidance. **CONTAINER DISPOSAL:** Triple-rinse (or equivalent), then puncture and dispose of in a sanitary landfill, by incineration, or by other means if burned, stay out of smoke.

Manufactured by:  
**GUARDIAN-IPCO, INC.**  
6625 Cahaba Valley Road • Birmingham, AL 35243  
EPA REG. NO. 11743-B      EPA EST. NO. 11743-AL-1

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