

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 23 2001

BASF MicroCheck Limited
Ruddington Fields Business Park
Mere Way, Ruddington
Nottingham NG11 6JS
United Kingdom

Mailed To: John W. Kennedy, John W. Kennedy Consultants, Inc.
Agent for BASF MicroCheck Limited
13 "C" Street, Suite G
Laurel, MD 20707

RE: MYACIDE AS
EPA Reg. No. 33753-3
Your Amendment Dated 11/23/2000

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to provide a revised basic Confidential Statement of Formula (CSF), and revised label which shows the nominal concentration of active ingredient changing from 95% to 97.5%, is acceptable with the following comments.

- 1. The submitted basic CSF dated 11/2/2000 is acceptable. It exactly matches the last accepted CSF dated 8/27/2000. We are not sure why it was submitted.
- 2. The following requested label revisions are accepted: changing the label active ingredient concentration from 95% to 97.5%; adding "BASF"; adding the registrants new name/address; adding new warranty information; removing data on physical/chemical parameters; removing "Drink egg whites, gelatin solution".

Note that your recent submissions to EPA-SRRD, regarding the Bronopol RED, will include a current review of your acute toxicity categories and associated labeling. The previously accepted "Precautionary Statements", and "Statement of Practical Treatment" on the last accepted label, and on the label you submitted to EPA-SRRD, and on the label which we have stamped and included with this letter, will be required to be revised in the future based at least on non-conformance with the current EPA "Label Review Manual" or with PRN 2000-3, as well as possible RED review mandated changes.

A label stamped "Accepted with comments" enclosed for your records.

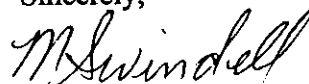
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If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,



Marshall Swindell,
Product Manager Team 33,
Regulatory Management Branch I
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELLING.

For use by manufacturers in formulating disinfectants, sanitizers, preservatives and microbicides.

Formulators using this product are responsible for obtaining EPA registration for their formulated product and for providing appropriate data.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Keep away from heat.

PESTICIDE DISPOSAL

Pesticide wastes are acutely 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 DISPOSAL

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Triple rinse (or equivalent) then offer drum for recycling or reconditioning, or puncture. Dispose of drum and liner in a sanitary landfill, or by incineration, if allowed by State and local authorities. If burned, stay out of smoke.

BASF

MYACIDE® AS

ACTIVE INGREDIENT:	
2-bromo-2-nitropropane-1,3-diol	97.5%
INERT INGREDIENTS:	2.5%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

- If swallowed - Drink large quantities of water. Do not administer liquids to an unconscious person. Call a physician.
- If inhaled - Remove person to fresh air.
- If on skin - Immediately flush skin with plenty of water for 15 minutes.
- If in eyes - Immediately flush eyes with plenty of water for 15 minutes. Call a physician.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes eye and skin damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. May cause allergic skin reactions in certain individuals. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before re-use.

ENVIRONMENTAL HAZARDS

This pesticide 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of waste.

CONDITIONS OF SALE AND WARRANTY

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labelling, all of which are beyond the control of the Seller. All such risks shall be assumed by the Buyer. BASF MicroCheck Limited warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to above. BASF MICROCHECK LIMITED MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL BASF MICROCHECK LIMITED BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

EASF-MicroCheck Limited offers this product, and the Buyer and User accept it, subject to the foregoing Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorised representative of BASF MicroCheck Limited.

MYACIDE® IS A REGISTERED TRADEMARK OF KNOLL AG

EPA REG. NUMBER 33753-3

EPA EST. NUMBER 33753-SBR 003

Registrant: BASF MicroCheck Ltd
Mere Way, Ruddington
Nottingham, NG11 6JS
United Kingdom

NET CONTENTS: SEE PACKAGE

ACCEPTED
with COMMENTS
in EPA Letter dated

FEB 23 2001

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

33753-3