

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 09 2002

BASF MicroCheck Limited
Mere Way, Ruddington
Nottingham, NG11 6JS
UNITED KINGDOM

AGENT: Sue Crescenzi
Steptoe and Johnson LLP
1330 Connecticut Avenue
Washington, D. C. 20036-1795

Subject: Myacide S1
EPA Registration No. 33753-6
Amendment Dated February 20, 2002

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

- To reword the First Aid statement per PR Notice 2001-1
- Addition of a Conditions of Sale and Warranty statement
- Reword trademark statement
- Change the Storage and Disposal statement

General Comments

Please note that the subheading "Pesticide Storage" must be moved from beneath the "Storage and Disposal" heading and placed in a separate paragraph with its own instructions.

The sentence "Do not contaminate water, food or feed by storage or disposal. Keep away from heat" must fall directly below the "Storage and Disposal" heading.

CONCURRENCES

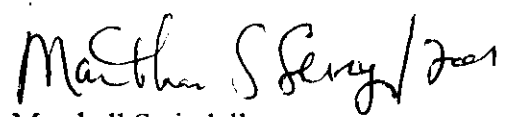
SYMBOL							
SURNAME							
DATE							

Page 2

Submit two (2) copies of the final printed labeling for our review. A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobial Division (7510C)

Enclosure

MYACIDE™ S1

MYACIDE S1 is a liquid microbiocide for use in controlling bacteria and algae in industrial applications. Not for the control of algae in the State of California.

ACTIVE INGREDIENT:
2-bromo-2-nitropropane-1,3-diol 18.2%

INERT INGREDIENTS: 81.8%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN DANGER

STATEMENT OF PRACTICAL TREATMENT	
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.
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 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 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.

HOT LINE NUMBER
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-832-4357 for emergency medical treatment information.

NOTE TO PHYSICIAN
Probable mucosal damage may contraindicate the use of gastric lavage.

NET CONTENTS: SEE PACKAGE

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes eye and skin damage. Do not get in eyes, on skin or clothing. May be fatal if swallowed. May cause allergic skin reactions in certain individuals. Wear goggles or face shield and rubber gloves when handling. 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 the 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 and plant authority. For guidance contact your local state water board or regional office of EPA. Do not contaminate water by cleaning of equipment or disposal of waste.

STORAGE AND DISPOSAL

PESTICIDE STORAGE

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

Empty residue into application equipment. Triple rinse (or equivalent) then offer drum for recycling or reconditioning, or puncture. Dispose of container in a sanitary landfill, or by incineration, if allowed by State and local authorities. If burned, stay out of smoke.

DIRECTIONS FOR USE

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

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS AND EVAPORATIVE CONDENSERS

For the control of slime-forming bacteria and algae.

MYACIDE S1 may be slug dosed directly into the sump or basin or it may be added by a suitable chemical pump. Where metering pumps are used, these must be set to deliver the required dose within 1 hour. The dosing point should be located close to the out from the basin to ensure rapid dispersal around the system.

MYACIDE S1 may be shock dosed once or twice weekly. Where contamination is heavy, more frequent dosing may be required. In heavily fouled systems, the tower should be drained and cleaned before treating with MYACIDE S1.

MYACIDE S1 should be shocked dosed at between 125ml and 500ml per cubic meter (1pt & 4pts per 1000 gallons) depending on the condition of the tower, the quality of raw water input and the amount of bleed off.

INDUSTRIAL PROCESS WATER

For the control of bacterial and algal growth in closed circuit machine cooling (injection molding, etc.) and stored (non-potable) water. To reduce the biofouling of pipework, heat exchangers, condenser tubes and minimise microbially produced corrosion.

Shock dosing into the sump/tank of the process water system is preferred. MYACIDE S1 can also be used as an intermittent, flush treatment during regular maintenance cleaning of water tanks (non-potable) or equipment.

In open systems shock dosing should be carried out on a once weekly to once monthly basis depending on the degree of contamination. In closed circuit systems less frequent dosing (once monthly/twice monthly) should be sufficient.

Dosing should be carried out to give an initial concentration of 250ppm MYACIDE S1 (250 ml/cubic meter or 2 pts./1000 gallons). When successful, dosing can be lowered to a minimum of 50ppm. For intermittent treatment of industrial process waters during routine maintenance MYACIDE S1 should be used at 500ppm and a contact time of at least one hour.

ACCEPTED with COMMENTS in EPA Letter Dated: MYACIDE IS A TRADEMARK OF BASF AG
EPA REG. NUMBER 33753-6
EPA EST. NUMBER 33753-GBR-003

Registrant: BASF MicroCheck Limited
Mere Way, Ruddington,
Nottingham, NG11 6J
United Kingdom

APR 09 2002
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
33753-6

Feb 20th 2002

384

OIL PROCESS WATERS

To inhibit the growth of slime-forming or corrosion inducing sulfate reducing bacteria in oil and gas well injection and formation waters.

MYACIDE S1 should be injected as a slug dose at any convenient point at 125 to 500 mls/1000L (1-4 pts/1000 gallons or 0.042 - 0.17 pts per barrel). A slug dose should be applied from once per week to once per month depending on the severity and rapidity of contamination.

OIL AND GAS FLUIDS

For the control of contamination and degradation of a wide range of gels and fluids caused by cellulolytic, slime forming or sulfate reducing bacteria. The type of fluids include fracturing, enhanced oil recovery, injection, well squeeze, drilling, workover and completion fluids.

MYACIDE S1 may be pre-mixed or added directly to the fluids during each industrial procedure. MYACIDE S1 should be added at 250 to 500 mls/cubic meter ie. 2-4 pts/1000 gallons or 0.09 to -0.18 pts. per barrel.

For well squeezed fluids MYACIDE S1 should be added at 125 to 1000 mls/cubic meter.

OIL AND GAS PIPELINE AND TANK MAINTENANCE

To control bacterial contamination in water bottoms in crude and refined hydrocarbon storage tanks, piping and transportation systems.

MYACIDE S1 can be injected directly into the water bottom, pipeline or may be added to the hydrocarbon phase.

Treatment can vary from once daily for pipeline maintenance to once every one or two months for both storage and transportation systems. Addition to the hydrocarbon phase will result in longer term protection by gradual diffusion into the water phase. MYACIDE S1 should be applied to achieve 125 to 1000 ppm in the aqueous phase. Higher concentrations may be added when dosing the hydrocarbon phase.

REPEATED COMMENTS
in EPA Letter Dated:

METALWORKING FLUIDS

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 33753-6

MYACIDE S1 is recommended for use in soluble oils, emulsions and synthetic fluids. It should be added directly to the sump (with agitation).

After addition of MYACIDE S1 the system should be circulated for about one hour before shutdown.

In diluted fluids, a concentration of 1250 to 5000 ppm of MYACIDE S1 in the fluid is sufficient to control microbial growth. A dose of 5 gallons of MYACIDE S1 in 1000 gallons will give 5000 ppm. For maintenance, add 500-2000 ppm of MYACIDE S1.

MYACIDE S1 may be incorporated in metalworking fluid concentrate by the manufacturer who should ensure that any incompatibility will not affect efficacy.

PAPER MILL PROCESS WATER

For the control of slime-forming bacteria in paper or paperboard process water systems.

MYACIDE S1 may be dosed at a convenient point early in the process system (machine chest, constant head box or backwater loop system).

MYACIDE S1 should be shock dosed once, twice or three times daily at between 50mls and 1250mls (0.1 and 2.5 pts) per tonne of finished paper or paperboard depending on the complexity of the system, quality of raw paper and type and degree of contamination.

PAPER MILLS - BULK PAPER

For the preservation of bulk quantities of pulp in paper and paperboard manufacturing systems. To control foul odours and general biodegradation of stock when it is stored in bulk for any significant period or time.

MYACIDE S1 may be dosed directly into the hydropulper, machine chest or stock chest.

In general a single slug dose will provide control for up to 3 days or longer depending upon the initial level of contamination in the stock. In situations where contamination is high, repeat dosing every 1-7 days may be required.

MYACIDE S1 should be dosed at between 250mls and 1000mls per tonne of stock (2-8pts/1000 gallons) depending on the type and degree of contamination.

ABSORBENT CLAYS

Impregnate absorbent clays with MYACIDE S1 to inhibit the growth of odour-causing bacteria. The suggested application rate is 120-1000ppm of Myacide S1 (0.2-1.6 oz av.) per 100 pounds of clay.

ADHESIVES

For the control of microbial contamination add 0.5 - 2.5pts of MYACIDE S1 per 100 lb total formulation weight. MYACIDE S1 is best added to any water to be incorporated into the formulation.

PAINTS, LATEX AND ANTIFOAM EMULSION SYSTEMS

To provide in-can preservation and prevent bacterial spoilage during shelf-life storage of acrylic, styrene-acrylic, polyvinyl acetate and other latex emulsion concentrates and latex emulsion based paints. Also for the preservation of silicone and other antifoam emulsion systems.

MYACIDE S1 may be added at any convenient point during the manufacturing process. Ideally it should be added as a final step just prior to packing of the product into bulk or sales packs.

If a heating stage is involved in the manufacture, add MYACIDE S1 after this stage when the product has cooled to below 40°C.

MYACIDE S1 should be dosed at 500 to 2500ppm based on the final formulation volume (500 to 2500 mls/cubic meter or 4 to 20pts/1000 gallons).

STARCH, PIGMENT AND EXTENDER SLURRIES

To inhibit the growth of spoilage bacteria during the manufacture, storage and distribution of water based suspension concentrates.

MYACIDE S1 may be dosed at or close to the end of the manufacturing process. If a heating stage is involved, the MYACIDE S1 should be added after this stage when the product has cooled to below 40°C.

MYACIDE S1 should be dosed at 500 to 2500ppm based on the final formulation volume (500 to 2500 mls/cubic meter or 4 to 20pts/1000 gallons).

Not for use in pigments in the State of California.

WATER BASED PRINTING INKS AND FOUNT SOLUTIONS

To inhibit the growth of spoilage bacteria during the storage and use of water based printing inks and fount solutions.

For in-can preservation MYACIDE S1 should be added at any convenient point during the manufacturing process, ideally after any heating stage and when the product has cooled to below 40°C.

For control of bacterial spoilage during the use of fount solutions, MYACIDE S1 should be shock dosed at a suitable point in the fount reservoir where there is adequate flow or turbulence to ensure quick mixing. MYACIDE S1 may be shock dosed once or twice weekly as a normal routine. Where conditions indicate, more frequent shock dosing may be required.

In-can preservation - MYACIDE S1 should be dosed at 500 to 2500ppm based on the final formulation volume (500 to 2500 mls/cubic meter or 4 to 20 pts/1000 gallons). Fount solution - MYACIDE S1 should be shock dosed at between 250 to 500ppm (250 to 500 mls/cubic meter; 2 to 4pts/1000 gallons) depending on the contamination levels in the fount reservoir.

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. The manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to above.

THE MANUFACTURER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

The manufacturer 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.