OCT 1 2 1994

The Boots Company Boots Microcheck Thane Road Nottingham NG2 3AA United Kingdom

Attention: John Kennedy, Agent

Clive S. Aveyard, Regulatory Affairs Manager

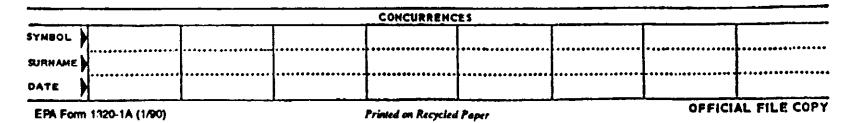
Subject: 2K7 Bugstick

EPA Registration No. 33753-18

Your Amendment Dated September 9, 1994 and cover letter dated September 23, 1994

The amendment (adding industrial recirculating water and metal working fluids), referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you:

- 1. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA sec 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
- 2. Make the following labeling changes below before you release the product for shipment bearing the amended labeling.
- a. The decimal points in the ingredient section percentages must be aligned.
- b. Only the basic registrants name should appear on the label. A distributors name and address are reserved for distributor labels.
- c. The misuse statement: "It is a violation of Federal law..." must be placed directly under the heading: Directions for Use.
- d. You may at your discretion, add the following statement: Do not administer liquids to an unconscious person.



- 2 -

- 2. A release for shipment of the product bearing the amended labeling constitues acceptance of these conditions.
- 3. A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, contact V. Goncarovs at 703-305-6663.

Sincerely,

Marshall Swindell

Acting Product Manager (31) Antimicrobial Program Branch Registration Division (H7505C)

Enclosures

CONCURRENCES								
YMBOL)								
URNAME)	***************************************				****			
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EPA Form 1320-1A (1/90)

Printed on Recycled Paper

OFFICIAL FILE COPY

PROPOSED DRAFT LABEL - 2K7 BUGS / ICK

A solid form microbiocide for use in controlling the growth of sulphate reducing and slime forming bacteria in oil and gas processing, metal working fluids and industrial recirculating water.

Active ingredient:

2-bromo-2-nitropropane-1,3-diol

81.26%

Inert ingredients

18.74%

Total

)

1

100.0%

ACCEPTED
with COMMENTS
in EPA Letter Desci:

OCT 1 2 1994

sUnder the Federal Insection of Fungicide, and Redenatorie compared amended, for the personal proportional under EPA Reg. No. 253753-78

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

If swallowed - Drink egg whites, gelatin solution or, if these are not available drink large quantities of water. 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

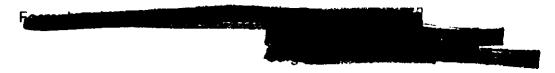
Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NUMBER 33753 - 18

EPA EST. NUMBER 67420-CN-01

NET CONTENTS 13 LB (5.9 KG) - 50 STICKS



The Boots Company PLC
Nottingham NG2 3AA, United Kingdom

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes eye and skin damage. Do not get in eyes, on skin or clothing. May be fatal if swallowed. Avoid breathing dust. 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 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.

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

Inner package is water soluble. Dispose of empty outer package in a sanitary landfill, or by incineration, if allowed by State and local authorities. If burned, stay out of smoke.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

DIRECTIONS FOR USE

2K7 Bugstick is a solid form microbiocide for use in controlling the growth of sulphate reducing and slime forming bacteria in oil and gas processing, metalworking fluids and industrial recirculating water.

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

OCT 1 2 1994

Under the Pacial Insurticide,

· Fungicide, and Rodenticide Act

OIL AND GAS APPLICATIONS

Use a weekly shock dose of 100 ppm active ingredient (one stick per 1000 litres) at under EPA Reg. No. based on the water content of the system until control is achieved. Thereafter, 33753 use a maintenance dose, once or twice weekly, of 10 to 25 ppm (one stick per 4000 to 10000 litres).

In Gas Wells: apply through the wellhead valving system so product drops down tubing.

In Oil Wells: drop product down tubing when sucker rods are pulled.

In Storage Tanks: drop through thief hatch.

Re-treat with a weekly shock dose if re-contamination is observed. Do not apply directly with oxygen scavengers, but treat alternatively.

METAL WORKING FLUIDS

Use 250 to 1000 ppm of active ingredient (3 to 10 sticks per 1000 litres OR 0.3 to 1.2 kg of Bugsticks per 1000 litres of system volume) in the fluid for initial treatment by application directly into the sump. A subsequent, weekly dose of 100 to 200 ppm (one stick per 500 to 1000 litres) is recommended to maintain control.

INDUSTRIAL RECIRCULATING WATER

A shock dose of 100 ppm active ingredient (one stick per 1000 litres) should be added to the cooling water once or twice weekly as required. Thereafter, a weekly maintenance dose of 15 to 50 ppm (one stick per 2000 to 6670 litres) active ingredient is also recommended.

