

4111-1 33753-18
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 27 1995

Knoll Pharmaceuticals
Knoll Microcheck
Wilford Business Park, Ruddington Lane
Wilford, Nottingham NG11 7EP
United Kingdom

Attention: John W. Kennedy, Agent
Clive S. Aveyard, Regulatory Affairs Manager
G. Cierrech, Information Officer

Subject: 2K7 Bugstick
EPA Registration No. 33753-18
Your Amendment Dated September 12, 1995

The amendment (adding paints, latex and antifoam emulsions systems), 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 signal word: "Danger" on the center panel must be at least 18 points type size.

b. Within the added claim for paints, latex and antifoams, revise the statement: "... and prevent bacterial spoilage in wash waters..." to read: inhibits the growth of bacteria in wash waters..."

c. Correct the company name and address from Boots to Knoll.

| CONCURRENCES | | | | | | | |
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| SYMBOL | | | | | | | |
| SURNAME | | | | | | | |
| DATE | | | | | | | |

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3. A release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions. 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,

Marion Johnson
Product Manager (31)
Antimicrobial Program Branch
Registration Division (7505C)

Enclosures

| CONCURRENCES | | | | | | | |
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| SYMBOL | | | | | | | |
| SURNAME | | | | | | | |
| DATE | | | | | | | |

PROPOSED DRAFT LABEL

2K7 BUGSTICK

A solid form microbiocide for use in controlling the growth of sulphate reducing and slime forming bacteria in industrial applications.

| | |
|---------------------------------|--------|
| Active ingredient: | |
| 2-bromo-2-nitropropane-1,3-diol | 81.26% |
| Inert ingredients | 18.74% |
| Total | 100.0% |

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. 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

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

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.

DIRECT

IT IS A VIOLATION
THIS PRODUCT IN
WITH

2K7 Bugstick is a s
in controlling the gro
slime forming bacte
metal working fluids
and paint, latex and

OIL AND C

Use a weekly sho
ingredient (one stic
the water content
achieved. Thereaft
once or twice week
per 4000 to 10000

In Gas Wells: apply
system so product

In Oil Wells: drop
sucker rods are pull

In Storage Tanks:

Re-treat with a
contamination is ob
with oxygen scavenger

METAL

Use 250 to 1000 p
10 sticks per 1000
Bugsticks per 1000
the fluid for initial tr
directly into the sur
dose of 100 to 200
1000 litres) is recor

INDUSTRIAL R

A shock dose of 10
stick per 1000 litres
cooling water once
Thereafter, a weekl
50 ppm (one stick p
active ingredient is

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PAINTS, LATEX AND ANTIFOAM EMULSION SYSTEMS

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

2K7 BUGSTICKS may be added at any convenient point during the manufacturing process, preferably where there is product agitation. They may be added as a final step prior to packing of the product into bulk or sales packs, but allowing sufficient time for dissolution and dispersion.

If a heating stage is involved in the manufacture, add 2K7 BUGSTICKS after this stage when the product has cooled to below 40°C.

2K7 BUGSTICKS should be dosed at 120 to 600 ppm based on the final formulation volume (4 to 19 sticks/1000 gallons)

RECEIVED
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