

PM 31 33753-18 10/3  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 12 1996

John W. Kennedy Consultants, Inc.  
13 "C" Street, Suite G  
Laurel, MD 20707

Attention: Mr. John W. Kennedy

Subject: 2K7 Bugstick  
EPA Registration Number 33753-18  
Your Submission Dated October 18, 1995  
EPA Received Date November 8, 1995


The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to change the company name, is acceptable.

The registration record for the product referenced above has been amended to include the change in company name from The Boots Company to Knoll Pharmaceuticals, LTD.

A stamped copy of the product labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-305-6966.

Sincerely yours,

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

CONCURRENCES

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

Knoll Pharmaceuticals Ltd  
Thane Road, 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.

ACCEPTED

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#### DIRECTIONS FOR USE

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

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, metal working fluids, industrial recirculating water and paint, latex and antifoam system.

#### OIL AND GAS APPLICATIONS

Use a weekly shock dose of 100 ppm active ingredient (one stick per 1000 litres) based on the water content of the system until control is achieved. Thereafter, 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.

#### PROPOSED LABEL EXTENSION

##### 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).

ACCEPTED

FEB 12 1976

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