

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 16 2002

Sue Crescenzi,  
Agent for BASF MicroCheck Ltd.  
Steptoe and Johnson LLP  
1330 Connecticut Avenue, N.W.  
Washington, D.C. 20036-1795

**Subject: 2K7 Bugstick**  
**EPA File Symbol 33753-18**  
**Your Amendment Dated 10/12/2001**

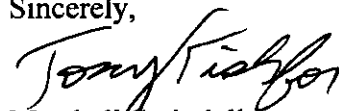
The amendment submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to revise the label, is acceptable with the following required revisions.

1. In the "Precautionary Statements", as per the attached re-registration related acute toxicity review dated 10/31/2000, you must add the following inhalation statement after "Do not breathe dust", "For handling activities, use dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P, or HE pre-filter."
2. In the "General Instructions", the label states "27K Bugstick is typically recommended at 100 ppm active ingredient which is equivalent to one stick per 1000 litres or 250 gallons." However, our calculations show that 1000L = 264 U.S. gallons, not 250 gallons. Therefore, consistently throughout this label, you must indicate that either 1000 liters equals 264 gallons, or that 946 liters equals 250 gallons, or use other values for liters and gallons which accurately reflects that 3.785 liters equals one U.S. gallon. As a cross ppm check, our calculations show that 1 stick = 0.26 lb = about 100 ppm in 264G. If any corrections change the 100 ppm calculation, you must make this global label change also.

We have enclosed a label stamped "accepted with comments" for your records.

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

Sincerely,



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

## CONCURRENCES

SYMBOL							
SURNAME							
DATE							

# BASF

US10012K7BUGSK

## 2K7 BUGSTICK

A solid form microbiocide for use in controlling the growth of sulphate reducing and slime forming bacteria in industrial applications. Not for the control of algae in the State of California.

ACTIVE INGREDIENT:	% w/w
2-bromo-2-nitropropane-1,3-diol	84.5
INERT INGREDIENTS:	15.5
TOTAL	100.0

**KEEP OUT OF REACH CHILDREN**  
**DANGER PELIGRO**

FIRST AID	
If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If inhaled	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
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.	

EPA REG. NUMBER 33753-18

EPA EST. NUMBER 67420-CN-01

NET CONTENTS: 13 LB (5.9KG) - 50 STICKS

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMAN AND DOMESTIC ANIMALS

**DANGER.** Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or inhaled. Harmful if absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

Applicators and other handlers must wear: Coveralls over long-sleeved shirt and long pants, Socks and chemical-resistant footwear, Goggles or face shield, and Chemical resistant gloves (such as rubber or made out of any waterproof material). Do not apply this product in a way that will contact workers or other persons. Wash thoroughly with soap and water after handling. Discard clothing or other absorbent materials that have been heavily contaminated with this product's concentrate. Do not reuse them. Remove lightly contaminated clothing and wash separately from other laundry using detergent and hot water before re-use.

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove personal protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### 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.

#### PHYSICAL AND CHEMICAL HAZARDS

This product is corrosive to mild steel.

### 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

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

### CONDITIONS OF SALE AND WARRANTY

The Directions for Use of this product reflect the opinion of experts based on field used 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.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JAN 16 2002

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

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

33753-18

October 10, 2001

2/3

#### DIRECTIONS FOR USE

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

#### GENERAL INSTRUCTIONS

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 systems

2K7 BUGSTICK is typically recommended at 100 ppm active ingredient which is equivalent to 1 stick per 1000 litres or 250 gallons. For each application area the dose can vary from 15 to 1000 ppm active ingredient. Refer to specific directions for use.

If a heating stage is involved during manufacture or processing add 2K7 BUGSTICK when the temperature has cooled to below 40°C.

#### OIL AND GAS APPLICATIONS

Use a weekly shock dose of one stick per 250 gallons based on the water content of the system until control is achieved. Thereafter, use a maintenance dose, once or twice weekly, of one stick per 1000 gallons.

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.

This product may be used in terrestrial and off-shore oil drilling muds and packer fluids.

#### METAL WORKING FLUIDS

2K7 BUGSTICK is recommended for use in soluble oils, semi-synthetic and synthetic fluids. It should be added directly to the sump (with agitation) and the system should be circulated for about one hour before shutdown.

Use 3 to 10 sticks per 250 gallons of the fluid by application directly into the sump. A subsequent, weekly dose of one stick per 125 to 250 gallons is recommended to maintain control.

#### INDUSTRIAL RECIRCULATING WATER

2K7 BUGSTICK may be dosed directly into the sump or basin or it may be added to the cooling water return at a suitable point. The dosing point should be located where there is adequate flow or turbulence to ensure quick dissolution and rapid dispersal around the system (eg. the pump outlet from the tower sump).

A shock dose of one stick per 250 gallons should be added to the cooling water once or twice weekly. Thereafter, use a weekly maintenance dose of one stick per 500 to 1500 gallons.

#### PAINTS, LATEX AND ANTIFOAM EMULSION SYSTEMS

To provide in-can preservation and growth inhibition of bacteria during storage of emulsion concentrates and latex emulsion based paints. Also for the preservation of silicone and other antifoam emulsion systems.

2K7 BUGSTICKS should be added to the aqueous phase 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.

Dose 2K7 BUGSTICKS at 4 to 19 sticks/1000 gallons of the final formulation volume.

#### INDUSTRIAL AND/OR COMMERCIAL AIR WASHERS, AIR CONDITIONING AND HUMIDIFYING SYSTEMS

For the control of bacterial and algal growth and to remove slime deposits. Dose into the water sump on a routine basis once per week or month. Heavily fouled systems may require twice weekly treatment.

Initially dose with 1 stick per 500 gallons. Subsequent dosing can be reduced by half.

Intermittent treatment during regular maintenance and cleaning using 1 stick per 250 gallons is also recommended with a contact time of at least one hour.

For smaller systems (250 gallons) one stick may be broken in half and then added.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JAN 16 2002

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

35763-18