UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 16 2000

Knoll Pharmaceuticals,
Distributed by BASF MicroCheck Limited
Ruddington Fields Business Park
Mere Way, Ruddington
Nottingham NG11 6JS

Mailed To: **John W. Kennedy,**
John W. Kennedy Consultants, Inc.
Agent for BASF MicroCheck Limited
13 "C" Street, Suite G
Laurel, MD 20707

RE: **MYACIDE S30**
EPA File Symbol 33753-20
Your Response Letter Dated 2/10/2000; Original Amendment Dated 8/10/99

Your response letter and original Amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to revise the "Precautionary Statements", "Statement of Practical Treatment", and "Use Directions", are acceptable with the following comments. You should make the following label improvement changes via a separate Amendment.

1. The original application dated 5/24/95 listed the following three product sizes: 25 kg drum, 200 kg drum, and 1000 kg IBC. Your Amendment application dated 8/10/99 now lists **only** a 1200 kg IBC (about 300 gallons). Did you discontinue the three other sizes? As stated in item # 3 of the original Registration Notice for this product, you must list each of the Net Contents on this master label. If you are now **exclusively** using a 300 gallon tote, or using this tote **in addition** to the other sizes, your storage and disposal directions must be modified to reflect this fact. We also need clarification as to what the "IBC" term means.

2. Your "Use Directions" are very minimal for several sections, and need to have more detail. You should use the attached guidelines listed in "FAD's" #1, #2 and #3.

3. You should indicate that the "Storage and Disposal" is the title for a separate section which should be completely enclosed in a box. It can be separated from the "Directions For Use" by drawing a horizontal line above "Storage and Disposal". There should be three subtitles in this box: "Pesticide Storage", "Pesticide Disposal", and "Container Disposal".

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DATE								

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A stamped copy of the accepted label is attached for your records.

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

Sincerely,

M Swindell

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

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DATE								

MYACIDE® S30

MYACIDE S30 is a liquid microbiocide for use in controlling the growth of bacteria and algae 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	30.0
INERT INGREDIENTS:	70.0
TOTAL	100.0

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

If on skin - Wash with plenty of soap and water. Get medical attention.

If in eyes - Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

If inhaled - Remove victim to fresh air. If not breathing, give artificial respiration, preferable mouth-to-mouth. Get medical attention.

If swallowed - Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

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

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

Knoll Pharmaceuticals 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 of Knoll Pharmaceuticals.

EPA REG. NUMBER 33753-20 EPA EST. NUMBER 33753-GBR-003

Registrant:

Knoll Pharmaceuticals (a part of BASF AG)
Main Road, Beeston
Nottingham, NG9 1AD
United Kingdom

Agent:

BASF MicroCheck Ltd
Mere Way, Ruddington
Nottingham, NG11 6JS
United Kingdom

NET CONTENTS: SEE PACKAGE

ACCEPTED with COMMENTS in EPA Letter Dated:

MAY 16 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 33753-20

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed, absorbed through the skin, or inhaled. Do not breathe vapor or spray mist. Do not get in eyes, on skin or on clothing. Wear goggles or face shield, protective clothing, and rubber (or chemical resistant) gloves. Wash thoroughly with soap and water after handling, and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Applicators and other handlers must wear long-sleeve shirt and long pants, socks plus shoes, and chemical resistant gloves. Do not apply this product in a way that will contact workers or other persons. Follow manufacturer's instructions for cleaning/maintaining personal protective equipment (PPE). If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. If pesticide gets inside clothing remove clothing immediately, wash thoroughly, and put on clean clothing. Users should remove PPE 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.

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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

GENERAL USE DIRECTIONS

To control the growth of slime-forming, spoilage, odor-causing and corrosion inducing bacteria and algae in industrial applications.

MYACIDE S30 can be dosed directly either by open pouring or by metered pump. Do not apply by open pouring of liquid to cooling water systems; a metering pump system is required for this use and application method.

For in-can product preservation MYACIDE S30 is best added to any liquid phase as late as possible during the manufacturing process and after any heating stage, or when the product has cooled below 40°C. Ensure good mixing and even distribution throughout the product.

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

Empty residue into application equipment. Triple rinse (or equivalent) then offer container 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.

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INDUSTRIAL RECIRCULATING WATER COOLING TOWERS AND EVAPORATIVE CONDENSERS

MYACIDE S30 may be 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 outlet from the basin to ensure rapid dispersal around the system.

MYACIDE S30 may be dosed once or twice weekly at 70-280 ml/cubic meter or 0.56-2.2 pt/1000 gallons (25 to 100 ppm active ingredient) depending on the condition of the tower, the quality of raw water input and the amount of bleed off. 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 S30.

INDUSTRIAL PROCESS WATER

For use 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. Closed circuit systems require less frequent dosing.

In open systems shock dosing should be carried out on a once weekly to once monthly basis depending on the degree of contamination.

Initially dose at 140 ml/cubic meter, or 1.1 pt/1000 gallons (50 ppm active ingredient). When successful, dosing can be lowered to a minimum level equivalent to 10 ppm active ingredient. For intermittent treatment during routine maintenance use MYACIDE S30 at 100 ppm active ingredient, and a contact time of at least one hour.

ADHESIVES

For in-can preservation of water-based adhesives and mastics incorporating acrylate and other polymer dispersions add 140-725 ml, or 0.3-1.5 pt MYACIDE S30 per 100 lb. Total formulation weight to any water to be incorporated into the formulation.

OIL AND GAS FLUIDS

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

Use for the in-can preservation of a wide range of gels and fluids including fracturing, enhanced oil recovery, injection, well squeeze, drilling, workover and completion fluids.

Add MYACIDE S30 at 140-280 ml/cubic meter (1.1-2.2 pt/1000 gallons, or 0.047-0.093 pt/barrel) which is equivalent to 50-100 ppm active ingredient.

For well squeeze fluids add MYACIDE S30 at 70-560 ml/cubic meter, or 0.56-4.5 pt/1000 gallons (25-200 ppm active ingredient).

OIL PROCESS WATER

For use in oil and gas well injection and formation waters. Inject MYACIDE S30 as a slug dose directly into well and formation waters at 70-280 ml/cubic meter; 0.56-2.2 pt/1000 gallons or 0.0235-0.093 pt/barrel (25-100 ppm active ingredient) A slug dose should be applied from once per week to once per month depending on the severity of contamination.

OIL AND GAS PIPELINE AND TANK MAINTENANCE

For use in water bottoms in crude and refined hydrocarbon storage tanks, piping and transportation systems.

Inject MYACIDE S30 directly into the water bottom or pipeline, or add to the hydrocarbon phase. Treat once daily for pipeline maintenance to once every one or two months for both storage and transportation system. Apply MYACIDE S30 at 70-560 ml/cubic meter, or 0.56-4.5 pt/1000 gallons of aqueous phase (25-200 ppm active ingredient). Higher levels may be added when dosing the hydrocarbon phase which will result in longer term protection by gradual diffusion into the water.

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METALWORKING FLUIDS

For use in soluble oils, semi-synthetic and synthetic fluids. Add directly to the sump (with agitation) and allow the system to circulate for about one hour before shutdown.

In diluted fluids add 700-2800 ml/cubic meter, or 0.7-2.8 gallons/1000 gallons (250-1000 ppm active) to control microbial growth. For maintenance, add 280-1120 ml/cubic meter or 0.28-1.1 gall/1000 gallons (100-400 ppm active ingredient) on a weekly basis preferably in the afternoon before shutdown. The frequency may be increased where significant contamination is identified.

MYACIDE S30 may be incorporated in metalworking fluid concentrate by the manufacturer who should ensure that any incompatibility will not affect efficacy.

PAPER MILL PROCESS WATER

Apply at a convenient point early in the process system (machine chest, constant head box or backwater loop system).

Shock dose once, twice or three times daily at 1 to 25 ppm a.i. in the process water. This equates to 30 to 700 ml (0.06 to 1.5 pt) 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 PULP

Add MYACIDE S30 directly into the hydropulper, machine chest or stock chest.

Apply MYACIDE S30 once weekly to once daily at between 150 and 560 ml per tonne of stock or 1.1-4.4 pt/1000 gallons (50-200 ppm active ingredient) depending on the degree of contamination.

ABSORBENT CLAYS

For in-can preservation impregnate absorbent clays such as fullers earth, sepiolite and attapulgite with MYACIDE S30 by spraying or pouring 7.0 to 56.0 ml/100 kg clay or 0.11-0.86 fl oz/100 pounds of clay (25-200 ppm active ingredient).

STARCH, PIGMENT AND EXTENDER SLURRIES

For in-can preservation apply MYACIDE S30 to water based solutions of starch or pigments and extender slurries such as kaolin, calcium carbonate and titanium dioxide. Recommended use rates are 280 to 1400 ml/cubic meter or 2.2-11.2 pt/1000 gallon based on the final formulation volume (100 to 500 ppm active ingredient).

NB: Not for use in pigments in the State of California.

PAINTS, LATEX AND ANTIFOAM EMULSION SYSTEMS

For in-can preservation of acrylic, styrene-acrylic, polyvinyl acetate and other latex emulsion concentrates, latex emulsion based paints, silicone and other antifoam emulsion systems.

Add MYACIDE S30 at 280 to 1400 ml/cubic meter or 2.2-11.2 pt/1000 gallon based on the final formulation volume (100 to 500 ppm active ingredient).

WATER BASED PRINTING INKS

To inhibit the growth of spoilage bacteria during the storage and use of water based printing inks, including their use as fountain solutions.

In-can preservation – MYACIDE S30 should be dosed at 280 to 1400 ml/cubic meter or 2.2-11.2 pt/1000 gallons based on the final formulation volume (100 to 500 ppm active ingredient).

During the use of fountain solution shock dose MYACIDE S30 at 140 to 280 ml/cubic meter (1.1 to 2.2 pt/1000gallon) depending on the contamination (between 50 and 100 ppm active ingredient). Apply once or twice weekly as a normal routine to the fountain solution sump.

ACCEPTED
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In EPA Letter Dated:

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

33753-20