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PM 31

48525-5

DEC 28 1984

Betz Energy Chemicals Inc.
1029 Cindy Lane
Corpintaria, CA 93013

Attention: Mr. Robert M. Goodell

Gentlemen:

Subject: Betz ER-22
EPA Registration No. 48525-5
Your Application Dated September 10, 1984
EPA Received Date September 17, 1984

The revised Confidential Formula agrees with the label and is acceptable. The alternate source of the raw materials for the active ingredient is also acceptable.

The Instructions for Pesticide and Container Disposal are acceptable.

The draft label above, submitted in connection with registration under FIFRA is acceptable, provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- a. The Fire-hazard caution should be: "Flammable. Keep away from heat and open flame." Note that the word "Flammable" should precede the Fire-hazard caution statement.
- b. The Pesticide disposal instructions should be grouped under a "Pesticide Disposal" heading and the container disposal instructions should be grouped under a "Container Disposal" heading.

CONCURRENCES

SYMBOL ▶								
SURNAME ▶								
DATE ▶								

-2-

- c. The Required "Environmental Hazards" paragraph follows:

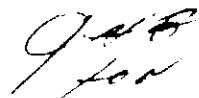
This pesticide is toxic to fish and wildlife. Do not apply in Marine and/or estuarine oil fields. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. 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 container and equipment or disposal of wastes.

- d. The words "Active Ingredient" in the ingredient statement should be singular.
- e. Submit for your file, the "Material Safety Data Sheet" referred to on the proposed label.
- f. Refer to "THE LABEL" and make sure that you have complied with the type size requirements and following items: 1,2,3,4,5,6a,6b, 7,7a,7b,7d,7f,8,8a,8b,9c,10c, and 10d. Refer also, to the A-79 enclosure in meeting the final printed label submission requirements. In most cases the final label is the label that will be affixed to the container.

2. Submit five (5) copies of our final printed labeling before you release the product for shipment.

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

Sincerely yours,



John H. Lee
Product Manager (31)
Disinfectants Branch
Registration Division (TS-767C)

Enclosure

CBI/DIS:Lee:JOB:50817:CBI-20:eg:12/12/84:Kenderick & Co:898-1270:Del.12/21/84

3/13/84

DETA
[LOGO] ENERGY
CHEMICALS,
INC.

1-21

(FIRST PANEL)

PRECAUTIONARY STATEMENTS[14b1]

HAZARDS TO HUMANS AND[12b1]
DOMESTIC ANIMALS[12b1]

DANGER[18b1]

HARMFUL IF SWALLOWED. Causes eye burns and skin irritation. Do not get into eyes, on skin or on clothing. Do not inhale vapor or mist. Use with adequate ventilation. Wear rubber gloves, goggles or face shield when handling. Immediately remove and wash contaminated clothing before reuse. Wash thoroughly after handling.

ENVIRONMENTAL HAZARDS[14b1]

This pesticide is toxic to fish and wildlife. Do not apply in marine and/or estuarine oil fields. Do not discharge into lakes, streams, ponds or public water unless in accordance with a permit. For guidance contact your Regional Office of the EPA. Do not contaminate water by cleaning of container or equipment or disposal of wastes. Apply this product only as specified on this label.

PHYSICAL AND CHEMICAL HAZARDS[14b1]

FLAMMABLE

Do not use, pour or store near heat, sparks or open flame. Keep container closed when not in use.

DIRECTIONS FOR USE[14b1]

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

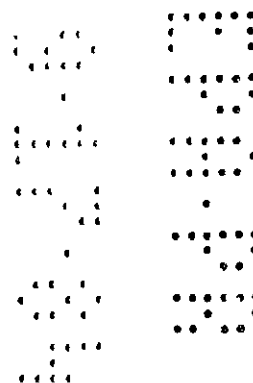
For the control of slime forming bacteria, fungi, algae and sulfide producing bacteria in oil field water, polymer, or mycellar flocods, water disposal systems or other oil field water systems, packer fluids and drilling muds.

(Directions for use continued on third panel.)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

DEC 28 1984

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

48525-5

[To: Carby Chemicals, Inc.] [Cont'd bottom 2nd panel.]
Business Phone: (800) 455-5551 Emergency

(See Panel)

Content: 11.0%

Active Ingredients:

Dacine (dodecylsuccinate
acetate).....10.0%

Inert Ingredients*.....90.0%

Total.....100.0%

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EPA Reg. No. 48525-5

WEIGHT PER GALLON OF PRODUCT
7.9 Pounds (40F)

NET WEIGHT OR VOLUME
AS MARKED ON CONTAINER

KEEP OUT OF REACH OF CHILDREN[12b(1)]

HAZARD[12b(1)]

STATEMENT OF FACTS[12b(1)]

In case of contact with skin, wash immediately
with plenty of soap and water. Immediately
contact physician.

In case of contact with eyes, flush promptly
and thoroughly with clean water for at least
15 minutes. Immediately contact physician.

In case of ingestion, immediately contact
physician.

A Material Safety Data Sheet containing more
detailed information relative to this product
is available upon request.

See left panel for additional precautionary
statements.

CARFINTERIA, CA 94513
(Health or Accident): 1-800-455-5551

(IMIXL PANEL)

EA-22 may be added to the system either contin-
uously or intermittently as required. The frequency
of feeding and duration of the treatment will depend
upon the severity of the pest infestation.

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SHOULY FOOLED. If the system is not fouled, no treatment is needed.

INTERMITTENT OR FEED METHOD

INITIAL DOSE: When the system is noticeably fouled, add ER-22 at the rate of 10 to 100 pounds (30 to 300 ppm) per 1000 barrels of water intermittently for 4 to 8 hours per day and from 1 to 4 times per week or as needed. Repeat until control is achieved.

SUBSEQUENT DOSE: When microbial control is evident, add ER-22 at the rate of 10 to 75 pounds (30 to 225 ppm) per 1000 barrels of water every 3 days or as needed to maintain control.

CONTINUOUS FEED METHOD

INITIAL DOSE: When the system is noticeably fouled, add ER-22 at the rate of 10 to 100 pounds (30 to 300 ppm) per 1000 barrels of water in the system. Continue until control is achieved.

SUBSEQUENT DOSE: When microbial control is evident, continuously feed to maintain a dosage of 10 to 75 pounds (30 to 225 ppm) per 1000 barrels of water in the system.

PACKER FLUIDS AND DRILLING MUDS[12b1]

Add ER-22 directly to the packer fluid or drilling mud at the rate of 50 to 500 pounds (50 to 500 ppm) per 1000 barrels. The dosage rate will depend upon the severity of the contamination.

STORAGE AND DISPOSAL[12b1]

STORAGE: Keep container tightly closed. Store in a dry place. Protect from freezing. Do not store at elevated temperatures.

DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

Pesticide wastes are acutely hazardous and/or toxic. 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.

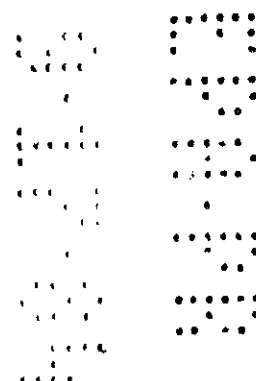
Metal and Plastic Containers[12b1]: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate or burn, if allowed by state and local authorities. If burned, stay out of smoke.

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by shaking and turning the drum to loosen
clinging particles. Empty drum into application
equipment. Then, spray or fill drum in a sani-
tary landfill or incinerator if allowed by state and
local authorities. Do not use empty drum or liner.

FOR INDUSTRIAL USE ONLY. Technical advice regarding
specific site problems is available from BETZ Energy
Chemicals, Inc.

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