



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 6, 2003

Ms. Linda Strugala
Product Manager
Chemco Products, Inc.
1349 Grand Oaks Drive
Howell, MI 48843

Subject: Label Amendment
A-100
EPA Registration No. 49396-1
Application dated November 27, 2002

Dear Ms. Strugala:

The following amendment, submitted in connection with registration under section of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comment.

Proposed Amendment

- revise label comments

Label Comments

1. The ingredient statement must total.....100%
2. Add the word "**Pesticide**" before the word Storage in the Storage and Disposal section.
3. Delete the statement "General Classification." This product has not been classified by the agency.

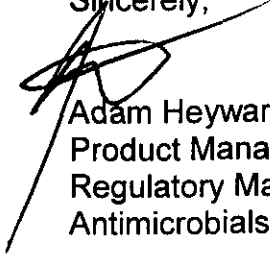
General Comments

Submit three (3) copies of your final printed label before you release the product for shipment bearing the amended label.

A stamped copy is enclosed for your records.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,



Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure

A-100

DIRECTIONS FOR USE GENERAL CLASSIFICATION

ACTIVE INGREDIENT:

Poly [oxyethylene (dimethyliminio) ethylene-
(dimethyliminio), ethylene dichloride] 15.0%

INERT INGREDIENTS 85.0%

This product contains 1.29 lb. of active ingredient per gallon and weighs 8.58 lb. per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes, or clothing.

FIRST AID

If Swallowed	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting. Do not give anything by mouth to an unconscious person.
If In Eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with soap and water for at least 15 minutes. Call a poison control center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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

A-100 is used to control algae, bacteria, and fungi in recirculating industrial and commercial cooling towers. Prior to its use, systems must be cleaned to remove algal growth, microbiological slime, and other deposits. An initial slug addition of 4.0 to 10.0 fl. oz. of A-100 per 1000 gallons of water to provide a concentration of 32 to 80 ppm of A-100 based on the total weight of water in the system, is recommended. Repeat initial dosage until control is evident.

Subsequent slug additions of 1.0 to 10.0 fl. oz. of A-100 per 1000 gallons of water (8 to 80 ppm of A-100) should be employed every 2 to 5 days, or as needed. The frequency of addition depends upon the relative amount of bleed-off and the severity of the microbiological problem. Slug additions should be made in the sump of water cooling towers.

A-100 is used to control bacteria in industrial air-washing systems that maintain effective mist-eliminating components. Prior to its use, systems should be cleaned to remove bacterial slime and other deposits. An initial slug dose of 14.8 to 24.7 fl. oz. of A-100 per 1000 gallons of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 10.1 to 24.7 fl. oz. of A-100 per 1000 gallons of water should be employed each 1 to 5 days, or as needed. The frequency of addition depends upon the relative amount of bleed-off and severity of the bacterial problem. Slug additions may be made to the sump or the water collection trays of the air-wash system.

STORAGE AND DISPOSAL

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

STORAGE: Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

If metal containers are used, **CONTAINER DISPOSAL** section should read: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

ACCEPTED

with COMMENTS
Date: FEB - 6 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 49396-1