

MAY 10 2005

Bert Volger; Agent for Chimac-Agriphar
c/o Ceres International LLC
1087 Heartsease Drive
West Chester, PA 19382

**Subject: BDL 1633 Industrial Microbiocide
EPA Reg. No. 55260-7: Re-Submission Dated 2/22/05**


The re-submission referred to above, submitted in connection with registration under Section 3(c)(7)(A) the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, which responds to the last EPA letter dated 1/19/05 by providing a revised label and data matrix, is acceptable provided that you comply with the item #1 listed below.

This amendment (original amendment request dated 10/20/04) adds "Me Too" uses (ie., EPA Reg. No. 67869-30) for pulp and paper mill systems, and for process waters. The last EPA letter dated 1/19/05 mentioned that in the acute toxicity review dated 3/27/03, the registrant's waiver request of the acute dermal data was granted which made this category default to a category I, requiring a skull and crossbones and the word "Poison" on the label.

The registrant in this latest submission requested category III based on MRID's 00124280 and 455344-02 for EPA Reg No.'s 241-269 (98.9%) and 55260-6 (39.6%), respectively. As per the attached acute toxicity review dated 4/14/05, the cited MRID studies are not acceptable for satisfying the dermal requirement for this product. However, because this product and "Me Too" products (eg., EPA Reg. No. 67869-30, etc.) are registered without the skull and crossbones and the word "Poison" on the label, the acute dermal toxicology Category I labeling is not being required at this time. This issue will be resolved for all products during re-registration of DGH.

#1. Submit/cite all data required for registration and/or re-registration of your product under FIFRA Section 3(c)(5) and section 4 when the Agency requires all registrants of similar products to submit such data. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A copy of the label stamped "Accepted With Comments" is enclosed. 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,


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

2 8.4



IMPORTANT: READ ALL PARTS OF THIS LABEL BEFORE USE

BDL 1633

Industrial Microbiocide

End-use product for control of algae, bacteria, and fungi in recirculating water cooling towers and sewage disposal lagoons; for control of slime forming bacteria and fungi in pulp and paper mill systems, in pulp and paper mill processing chemicals, adhesives and coatings, and in air washer systems and brewery pasteurizers.

ACTIVE INGREDIENTS:

Dodecylguanidine hydrochloride..... 34.1%

INERT INGREDIENTS:..... 65.9%

TOTAL:..... 100.0%

Net Contents: 53 gallons (2.7 pounds of active ingredient per gallon)

EPA Reg. No. 55260-7

EPA Est. No. 55260-BL-001

DANGER PELIGRO KEEP OUT OF REACH OF CHILDREN

See Side Panel for Additional Precautionary Statements

FIRST AID

IF IN EYES: 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. Call a poison control center or doctor for treatment.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: 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 unless told to by a poison control center or doctor.

For additional information in case of emergency call toll free (1-800-228-5635).

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the usage of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

MAY 10 2005

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

55260-7

PRECAUTIONARY STATEMENTS

DANGER. Corrosive. Fatal if absorbed through skin. Causes irreversible eye damage and skin burns. May be fatal if inhaled. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wear protective eyewear (goggles, face shield or protective safety glasses), long-sleeved shirt and long pants, socks, chemical resistant gloves and chemical resistant footwear. Wear a respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number TC-14G), or a NIOSH approved respirator with an organic vapor cartridge or canister with any N, R, P and HE prefilter. Wash thoroughly after handling with soap and water, and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

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 this product is specifically identified and addressed in 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.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.
PESTICIDE STORAGE: Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Store this product between 60 °F and 110 °F. Keep drum tightly closed when not in use.
PESTICIDE AND CONTAINER DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or restate 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. Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by incineration, if allowed by state and local authorities. If burned, stay out of smoke.
IN CASE OF ACCIDENT: For large spills, a NIOSH approved, positive pressure, self-contained respirator and rain suit is recommended. Cover spills with some inert absorbent material. Sweep up absorbed spill and place in a waste disposal container for proper disposal. Flush spill area with water.
IN CASE OF FIRE: On small fire use dry chemical or carbon dioxide. On a large fire use water spray or foam. Wear self-contained positive pressure breathing apparatus and full firefighting protective clothing.

ACCEPTED
with COMMENTS
EPA Office Dated:

MAY 10 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 55260-7

DIRECTIONS FOR USE

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

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS: This product reduces the growth of algae, bacteria and fungi in industrial recirculating water-cooling towers. Reduction of microbial growth is obtained by the addition of BDL1633 as a slug dosage one to three times per week at a dosage of 5.3 to 8.0 fluid ounces per 1,000 gallons of water in the system (40 to 60 parts of product per million parts of water by weight). Once the reduction is accomplished, the addition of BDL1633 can be reduced to a periodic dosage of 2.7 to 5.3 fluid ounces per 1,000 gallons of water, once per week or as needed. For application by proportioning pump, these dosages should be calculated on the basis of each one thousand gallons of bleed-off. The basis of the tower or a line from a hot well are suitable addition points. Application should be made to systems when the presence of microbial contamination is first noticed. Water-cooling towers, which are heavily contaminated, should be cleaned manually before treatment with this product. Do not use in potable water systems.

SEWAGE DISPOSAL LAGOONS: This product reduces the growth of algae on the surface of aerobic and facultative sewage lagoons, which, if unchecked, can cause the lagoon to become totally anaerobic and emit odors. Dilute BDL1633 with water to accommodate the delivery characteristics of the pump and spray rig, and apply evenly to the surface of the lagoon. Dosage should be 1.0 to 1.5 fluid ounces of BDL1633 per 100 square feet of surface, depending on the population density of the algal blooms. The interval between treatments will be determined by the reappearance of floating algal blooms and subsequent treatments should be made as spot treatments at the same dosage as the initial treatment. A small outboard motorboat equipped with a tank-pump

4 8 4

spray boom assembly can be used to traverse the lagoon between flagmen on opposite shores in order to lay down an even spray pattern.

PULP AND PAPER MILL SYSTEMS: Do not use for adhesives and coatings applications that involve direct or indirect food, or human drinking water contact. Add 0.007 to 0.1 lb of BDL 1633 per ton (dry basis) of pulp or paper produced as slug dose for the control of bacterial and fungal slime in the production of paper. Add BDL 1633 to the Beater or Hydropulper to ensure uniform mixing.

PRESERVATION OF PULP AND PAPER MILL PROCESSING CHEMICALS, ADHESIVES, AND COATINGS: Add directly to the material to be preserved prior to manufacturing into the finished product (pulp, broke, polymers, defoamers, alum, emulsions, adhesives, papermill, coatings, pigment slurries, and paper products. The dosage rate will depend upon the material to be preserved and the storage time. The usual addition should be 1.3 to 4.0 fluid ounces per 1,000 gallons chemicals, adhesives or coatings (10 to 30 ppm). Under extreme conditions of spoilage, the dosage rate should be increased to 1.6 to 10.4 fluid ounces per 1,000 gallons chemicals, adhesives or coatings (12.5 to 80 ppm). These recommendations are based on a maximum storage time for 2 weeks. For storage time greater than 2 weeks the maximum concentration should be increased to 6.6 to 132 fluid ounces per 1,000 gallons chemicals, adhesives or coatings (50 to 1,000 ppm).

PROCESS WATERS AND NON-POTABLE WATER TREATMENT: This product reduces the growth of algae, bacteria, and fungi in Industrial Air Washing Systems, Brewery Pasteurizer Water, Industrial Recirculating Cooling Water and Auxiliary and Standby Commercial and Industrial Systems that maintain effective mist eliminating components. Badly fouled systems must be cleaned before treatment is begun.

SLUG OR INTERMITTENT METHOD: **Initial dose:** when system is noticeably fouled apply 6.6 to 13.2 fluid ounces per 1000 gallons (50 to 100 ppm). Repeat until control is achieved. **Subsequent dose:** When control is evident, apply 3.3 to 6.6 ounces per 1000 gallons (25 to 50 ppm) every three days or as needed.

CONTINUOUS METHOD: **Initial dose:** When system is noticeably fouled apply 6.6 to 13.2 fluid ounces per 1000 gallons (50 to 100 ppm). **Subsequent dose:** Maintain initial rate by continuously feeding 3.3 to 6.6 ounces per 1000 gallons (25 to 50 ppm) per day.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of CHIMAC-AGRIPHAR. The user or buyer shall assume all such risks.

DISCLAIMER OF WARRANTIES: CHIMAC-AGRIPHAR MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of CHIMAC-AGRIPHAR is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. CHIMAC-AGRIPHAR DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT CHIMAC-AGRIPHAR'S ELECTION, THE REPLACEMENT OF PRODUCT.

Chimac-Agriphar S.A.
RUE DE RENORY, 26
B-4102 Ougree, Belgium

EPA approved on 04/17/03 and revised with EPA's comments incorporated 05/07/03; additional uses added 10/19/04; revised and resubmitted on 02/22/05 in response to EPA's review 01/19/05; submitted with additional changes on 02/05/05

ACCEPTED
WITH COMMENTS
in EPA Letter Dated:

MAY 10 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
55260-7