

57787-23

1/26/2012

1/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 26 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Milo Fortier
Haviland Products Company
421 Ann Street, N.W.
Grand Rapids, MI 49504

Subject: Combat 60
EPA Reg. No. 57787-23
Amendment Date: October 20, 2011
EPA Receipt Date: October 31, 2011

Dear Mr. Fortier:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

Proposed Amendment

- Adding additional use sites
- Adding Refillable container disposal language
- Adding alternate formulation #2

Conditions

Revise the label as follows:

- 1.) Delete "Mollusk Control" heading and state "Recirculating Cooling Water Systems" on page 5.
- 2.) Delete the "Industrial Fresh Water Systems" to state "Pulp and Paper Mills." Delete second paragraph for application to other industrial fresh water systems. You must be specific by indicating the type of manufacturing plant water systems that are being treated.
- 3.) Move the "Water Cooling Systems" directions on page 6 to appear under the "Recirculating Cooling Water Systems" directions on page 5 as the second paragraph. Also, revise the first statement in this set of directions by indicating application into a recirculating cooling water tower.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

The Confidential Statement of Formula for alternate formulation 2 dated October 20, 2011 is acceptable.

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at Campbell-mcfarlane.jacqueline@epa.gov or call (703) 308-6416 or Glen McLeod by email at McLeod.glen@epa.gov or call (703) 347- 0181.

Sincerely,

Jacqueline Campbell
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: Stamped Label

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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COMBAT 60

KEEP OUT OF REACH OF CHILDREN

CAUTION

See first aid and additional precautions on [back] [side] panel.

ACTIVE INGREDIENT:

Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride].....	60%
OTHER INGREDIENTS.....	40%
TOTAL.....	100%

This product contains 5.76 lbs. of active ingredient per gallon and weighs 9.6 lbs. per gallon.

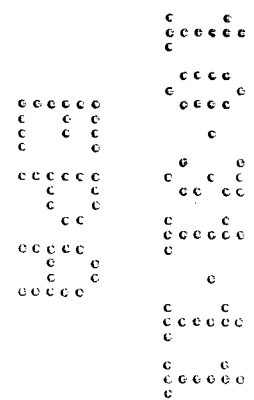
PACKAGED BY:

Haviland Consumer Products, Inc.
421 Ann Street N.W.
Grand Rapids, MI 49504

EPA Reg. No. 57787-23
EPA Est. No. 57787-MI-001
Net Contents: (see container label)
Batch Code # / Lot #: (see container label)

ACCEPTED
With COMMENTS
 EPA Letter Dated:
JAN 26 2012

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended for the pesticide,
 registered under EPA Reg. No.
57787-23



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MASTER LABEL
(rev. 10-20-11)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information call CHEMTREC at 1-800-424-9300.

If Swallowed:

- Call 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 do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

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 advice.

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 in Eyes:

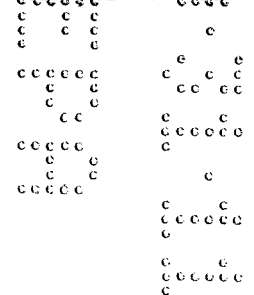
- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a Poison Control Center or doctor for treatment advice.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS

(Containers less than 5 gallons) – This product is toxic to fish and aquatic organisms.

(Containers greater than or equal to 5 gallons) - This product is toxic to fish and aquatic organisms. 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.



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DIRECTIONS FOR USE

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

{Optional intro statement 1 – when directions for swimming pool, spa, and closing use are on product.}

[Combat 60] or [This product] is used to control the growth of all types of algae in swimming pools, spas, whirlpools, hot tubs, and decorative fountains. Using [Combat 60] or [this product] weekly prevents algae outbreaks from occurring. This formula is non-foaming and is the preferred choice for use in fountains, stand alone spas, or spas attached to swimming pools. [Combat 60] or [This product] is compatible with pools or spas that are sanitized with chlorine or bromine. Continued use of [Combat 60] or [this product] may reduce the amount of chemicals normally required to maintain your pool, spa, hot tub, or fountain. [Combat 60] or [This product] can be used during the colder months when swimming pools are covered or no longer in use.

{Optional Marketing Statement, shown in [] below}

[There are three important steps to follow to maintain sparkling clean water in your pool:]

[Step 1 – Add SANITIZER to control bacteria.]

[Step 2 – Add SHOCK to destroy contaminants.]

[Step 3 – Add ALGAECIDE to prevent algae before it starts.]

[All three steps are vital to achieve sparkling clean water.]

{Optional intro statement 2 – when directions for swimming pool use only are on product.}

[Combat 60] or [This product] is used to control the growth of all types of algae in swimming pools. Using [Combat 60] or [this product] weekly prevents algae outbreaks from occurring. This formula is non-foaming and is compatible with pools that are sanitized with chlorine or bromine. Continued use of [Combat 60] or [this product] may reduce the amount of chemicals normally required to maintain your pool.

{Optional intro statement 3 – when directions for spa use only are on product.}

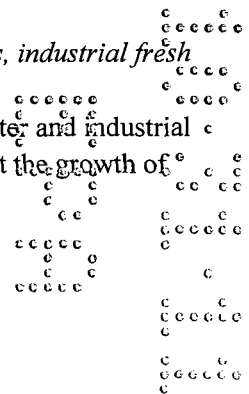
[Combat 60] or [This product] is used to control the growth of all types of algae in spas, hot tubs, whirlpools and fountains. This formula is non-foaming and is the preferred choice for use in fountains, stand alone spas, or spas attached to swimming pools. [Combat 60] or [This product] is compatible with spas that are sanitized with chlorine or bromine. Continued use of [Combat 60] or [this product] may reduce the amount of chemicals normally required to maintain your spa, hot tub, or fountain.

{Optional intro statement 4 – when directions for swimming pool, off-season use only are on product.}

[Combat 60] or [This product] is used during the colder months when swimming pools are covered or no longer in use. This formula is non-foaming and is compatible with pools that are sanitized with chlorine or bromine.

{Optional intro statement 5 – when directions for mollusk control, water cooling systems, industrial fresh water systems, industrial air washing systems, or cutting fluids are on product.}

Combat 60 is used to control algae, bacteria, fungi and mollusks in industrial cooling water, and industrial process water systems; control bacteria in industrial water cooling systems; and to inhibit the growth of bacteria that cause degradation of cutting fluids.



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**MASTER LABEL
(rev. 10-20-11)**

Swimming Pools:

When using other products in conjunction with this product, follow the instructions on those products. NEVER mix different products together in the same bottle or pail. Always add this product directly to water with the pool pump on. Clean the pool filter as necessary following the manufacturer's instructions for backwashing or using a filter cleaning solution. Adjust pH of pool water to the ideal range of 7.4 – 7.6. In pools sanitized with chlorine, adjust stabilizer levels to 30 – 50 ppm. Maintain available chlorine levels in the range of 1 – 3 ppm.

For treatment of freshly filled, cleaned, or restored pools, add 6 to 11 fluid ounces of [Combat 60] or [this product] per 10,000 gallons of water directly into the pool. Maintenance additions of 2 to 4 fluid ounces of [Combat 60] or [this product] per 10,000 gallons of water must be made every 5 to 7 days after initial treatment. After heavy rain, add an additional 2 fluid ounces per 10,000 gallons of water.

Prior to using this product, pools with heavy algae growth, must be vacuumed. If the pool is properly equipped, the vacuumed algae growth must be vacuumed directly out of the pool to waste. For pools having light to medium algae growth, add 11 to 17 fluid ounces of [Combat 60] or [this product] per 10,000 gallons of water directly to the pool. Brush pool to increase circulation and to remove algae from pool walls and bottoms.

Pool use may resume 15 minutes after applying this product to the water.

Spas:

- When using other products in conjunction with this product, follow the instructions on those products.
- NEVER mix different products together in the same bottle or pail. Always add this product directly to water with the circulation pump on. Clean the spa filter as necessary using a filter cleaning solution. Adjust pH of spa water to the ideal range of 7.4 – 7.6. Maintain available chlorine levels in the range of 1 – 3 ppm.
- For treatment of a freshly filled, cleaned, or restored spa, whirlpool, hot tub, or decorative fountain, add initially 0.6 to 1.1 fluid ounces of this product per 1,000 gallons of water directly into the spa or hot tub. Maintenance additions of 0.2 to 0.4 fluid ounces of this product per 1,000 gallons of water must be made every 5 to 7 days after initial treatment.

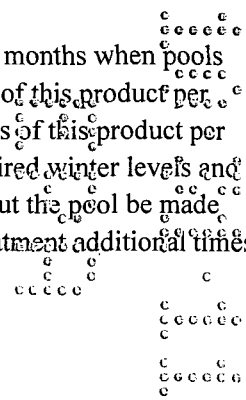
For spas, whirlpools, hot tubs, and decorative fountains having light to medium algae growth, add 1 to 2 fluid ounces of this product per 1,000 gallons of water directly into the spa or hot tub. Brush spa to increase circulation and to remove algae from spa walls and bottoms.

Spa use may resume 15 minutes after applying this product to the water.

Swimming Pools (Off-Season Winter Months):

When using other products in conjunction with this product, follow the instructions on those products. NEVER mix different products together in the same bottle or pail. Clean the pool filter as necessary following the manufacturer's instructions for backwashing or using a filter cleaning solution. Prepare your pool for the closing season by adjusting pH of pool water to the ideal range of 7.4 – 7.6.

[Combat 60] or [This product] will prevent growth of algae during the off-season winter months when pools are not in use. When pool is balanced and free of visible algae, add 6 to 10 fluid ounces of this product per 10,000 gallons of water. If pool has some visible algae growth, add 12 to 20 fluid ounces of this product per 10,000 gallons of water. Add this product with the pump running before draining to desired winter levels and placing winter cover. It is necessary that a uniform distribution of this product throughout the pool be made for maximum effectiveness. If pool is not covered, it may be necessary to repeat the treatment additional times during the season, consult your dealer.



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**MASTER LABEL
(rev. 10-20-11)**

Decorative Fountains:

[Combat 60] or [This product] is used to control the growth of algae in decorative fountains that do not contain fish. Manually clean heavy growths of algae prior to treatment. Fountains with just visible algae growth require an initial dose of 1.0 to 2.0 fluid ounces of [Combat 60] or [this product] per 1000 gallons of water. To treat a freshly cleaned and filled fountain, add 0.5 to 1.5 fluid ounces of [Combat 60] or [this product] per 1000 gallons of water. For maintenance dosages, add 0.2 to 0.5 fluid ounces of [Combat 60] or [this product] per 1000 gallons of water every 5 to 7 days as needed. Make sure [Combat 60] or [this product] is added at a point where it can be uniformly distributed. [Combat 60] or [This product] is used in fountains treated with chlorine chemicals, but do not mix [Combat 60] or [this product] with concentrated dry or liquid chlorine products.

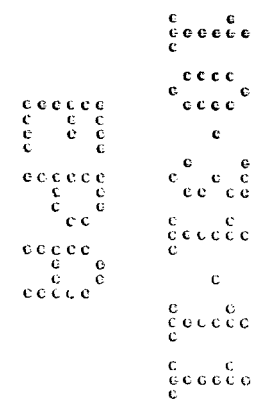
Mollusk Control:

To control mollusks such as Corbicula species in recirculating cooling water and industrial systems, add [Combat 60] or [this product] at dosage rates of 2 to 20 ppm. Make continuous or intermittent additions at the intake water. Continuous addition is required for noticeably fouled systems. Intermittent feeding is used to maintain control. [Combat 60] or [This product] is used to control algae and mollusks such as Corbicula and Dreissena species in potable water treatment systems. Mitigation: Add [Combat 60] or [this product] to the raw water at dosage rates of 2 to 5 ppm (2 to 5 mL of [Combat 60] or [this product] / 1000 L of water). For badly fouled systems, treat continuously for up to 21 days, followed by regular control treatments. Control: To avoid fouling of potable water systems by mollusks, treat the raw water at 2 ppm for 60 minutes, repeating this treatment daily or a continuous feed of 0.5 mg/L.

Industrial Fresh Water Systems:

[Combat 60] or [This product] is used to control the growth of algae, bacteria and fungi in holding and processing tanks of industrial fresh water systems supplying water to pulp and paper mills, and other manufacturing plants. In such systems, it is employed as a replacement for or supplement to the conventional treatment with chlorine or chlorine compounds. In pulp and paper mills, treatment of the fresh water with [Combat 60] or [this product] makes an important contribution to slime control. The use of [Combat 60] or [this product], as described, reduces the development of slime in fresh water pipes, fresh water spraying nozzles, and on the pulp and paper mill machine parts contacted by fresh water. However, do not use [Combat 60] or [this product] as the primary microbiocide for pulp and paper mill slime control since absorbents such as wood pulp rapidly absorb the product and greatly reduce its concentration in the circulating water. NOTE: Do not use in paper and paperboard that will contact food.

For the control of algae, bacteria, and fungi in industrial fresh water systems, [Combat 60] or [this product] is added at the rate of 1 to 11 fluid ounces per 10,000 gallons of water to provide a concentration of 1 to 10 ppm of [Combat 60] or [this product]. Treatment is made continuously and is based on the amount of water entering the intermediate processing operations. In some cases, regular treatment periods of several hours each day will provide adequate control of the microorganisms.



Water Cooling Systems:

Prior to the use of [Combat 60] *or* [this product] in water cooling towers, clean the systems to remove algal growth, microbiological slime, and other deposits. Then make an initial slug addition of 0.9 to 2.2 fluid ounces of [Combat 60] *or* [this product] per 1000 gallons of water to provide 8 to 20 ppm of [Combat 60] *or* [this product], based on the total weight of water in the system. Repeat initial dosage until control is evident. Make subsequent slug additions of 0.2 to 2.2 fluid ounces of [Combat 60] *or* [this product] per 1000 gallons of water (2 to 20 ppm of [Combat 60] *or* [this product]) every 2 to 5 days or as needed. The frequency of addition depends upon the relative amount of bleedoff and the severity of the microbiological problem. Make slug additions in the sump of water cooling towers.

Industrial Air Washing Systems:

[Combat 60] *or* [This product] is used to control bacteria in industrial air washing systems that maintain effective mist eliminating components. Prior to its use, clean the systems to remove bacterial slime and other deposits. The typical initial slug dose is 3.33 to 5.55 fluid ounces of [Combat 60] *or* [this product] per 1000 gallons of water. Repeat initial dosage until control is evident. Make subsequent slug additions of 2.25 to 5.55 fluid ounces of [Combat 60] *or* [this product] per 1000 gallons of water each 1 to 5 days, or as needed. The frequency of addition depends upon the relative amount of bleedoff and severity of the bacterial problem. Make slug additions into the sump or into the water collection trays of the airwash system.

Cutting Fluids or Oils:

[Combat 60] *or* [This product] is employed for the inhibition of bacterial degradation of aqueous solutions or emulsions of the cutting fluids or oils employed as lubricants or coolants in the machining and processing of metals. It is used for the preservation of water-based synthetic metalworking fluids based on amines, borates, phosphates, nitrates, etc, and also for the protection of those fluids based on soluble or emulsifying oils modified with nonionic surfactants. It is not to be used, however, for use in insoluble or straight oils or in fluids containing anionic surfactants. For preservation of cutting fluids, add 0.01 to 0.10 % of [Combat 60] *or* [this product], based on the total weight of the diluted cutting fluid. In some cases, [Combat 60] *or* [this product] can be added to the concentrated fluids. In these cases, add [Combat 60] *or* [this product] at such an amount to where the final concentrations of 0.01 to 0.1 % are obtained when the concentrated fluid is diluted with water for use in metalworking operations. For continued protection against bacterial degradation, repeat the treatment of the diluted cutting fluid every four weeks. If excessive contamination of a particular cutting fluid system occurs, more frequent treatments can be used. The latter condition may be indicated by the development of abnormal odors or an unusual appearance of the cutting fluid solution or emulsion and can be determined by bacteriological testing procedures.

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MASTER LABEL
(rev. 10-20-11)

STORAGE AND DISPOSAL

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

(Household / Residential Use)

Keep this product dry in a tightly sealed container when not in use. Store in a cool, dry, well-ventilated area and away from heat or open flame, and children or persons unfamiliar with its use. In case of decomposition, isolate container (if possible) and flood area with large amounts of water to dissolve all material before discarding the container.

Nonrefillable container. Do not reuse or refill this container. Securely wrap original container in several layers of newspaper and discard in trash or offer for recycling if available.

(Commercial / Industrial / Institutional Use)

PESTICIDE STORAGE: Keep this product dry in a tightly sealed container when not in use. Store in a cool, dry, well-ventilated area, away from heat or open flame. In case of decomposition, isolate container (if possible) and flood area with large amounts of water to dissolve all material before discarding the container.

PESTICIDE DISPOSAL: Pesticide wastes may be 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 HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent). Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

(Refillable plastic containers, capacity of 55 gallons or less)

Do not contaminate water, food, or feed by storage and disposal. Do not ship with food, feed, drugs, or clothing.

PESTICIDE STORAGE: Keep container closed when not in use. In case of spills, use sawdust or sand to absorb the spilled pesticide and dispose of in a sanitary landfill.

PESTICIDE DISPOSAL: Pesticide wastes may be 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 HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container prior to refilling or disposal, use a triple rinse wash as follows: Empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously. Pour or pump rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this rinsing procedure two more times.

STORAGE AND DISPOSAL (continued)

(Refillable plastic containers, capacity of greater than 55 gallons)

Do not contaminate water, food, or feed by storage and disposal. Do not ship with food, feed, drugs, or clothing.

PESTICIDE STORAGE: Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. In case of spills, use sawdust or sand to absorb the spilled pesticide and dispose of in a sanitary landfill. Keep container closed when not in use.

PESTICIDE DISPOSAL: Pesticide wastes may be 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 HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container prior to refilling or disposal, use a pressure wash as follows: Empty the remaining contents into application equipment or a mix tank. Use a pressure wash system that rinses all interior sides with water and that is rated at >40 psi and >120°F. Pressure wash the container for a length of time that ensures that a minimum 25% of the container volume of water is used. During the pressure wash, ensure that the container valve is left open for continuous draining. Collect the rinsate and empty into application equipment or a mix tank or store rinsate for later use or disposal. Allow container to drain for 10 minutes after pressure wash is completed.

*All text in brackets [xxx] is optional and may or may not be included on final label.
All italicized text is administrative and will not appear on final label.*

Optional marketing statements that may be used on the front panel of the label with [swimming pool] [spa] algae treatment applications:

- [Algae control for swimming pools]
- [Algaecide]
- [Algaecide and water clarifier for swimming pools]
- [Clear cloudy water]
- [Compatible with all pool surfaces]
- [Concentrated algaecide for use in swimming pools]
- [Controls algae growth]
- [Controls the growth of algae]
- [Controls the growth of algae in swimming pools, spas, whirlpools and hot tubs]
- [For spas and hot tubs]
- [For swimming pools]
- [For the control and destruction of black and mustard algae and algal slime]
- [For treatment of algae in swimming pools]
- [For use in all pool types]
- [For use in swimming pools]
- [Ideal for all pool types]
- [Ideal for all pool surfaces]
- [Ideal for pool start-ups]
- [Ideal for pool closings]
- [Ideal for spas and hot tubs]
- [Ideal for winterizing treatments]
- [Inhibits algae growth]
- [Inhibits the growth of algae]
- [Kills and controls algae]
- [Maintenance algaecide for swimming pools]
- [Non-foaming]
- [Prevents algae growth]
- [Prevents the growth of algae]
- [Produces clear, sparkling water]
- [Restores water clarity]
- [Step 3] *Algaecide is marketed as step 3 of a three step program to treat swimming pool water to allow easy product identification by consumers. This marketing phrase is closely associated with the {Optional Marketing Statement} under the "Directions of Use" section.*