

63838-8

9/28/2011

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

SEP 28 2011

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. Michael Harvey  
EnviroTech  
500 Winmore Way  
Modesto, CA 95358

Subject: CLEARAID™ SCP  
EPA Registration No.: 63838-8  
Application Date: 09/06/2011  
Receipt Date: 09/12/2011

Dear Mr. Harvey:

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

**Proposed Amendment**

- Addition of use in "Water Based Metalworking and Cutting Fluid"

**Conditions**

Revise the label as follows:

- 1) Revise the Precautionary Statements to read:  
  
"Harmful if absorbed through skin or swallowed or inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing vapors. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, and using the toilet."
- 2) Revise the first sentence of the Environmental Hazards to read: "This pesticide is toxic to fish, aquatic invertebrates, and clams" as per the RED.
- 3) Delete the second sentence of the Water Based Metalworking and Cutting Fluids. The term "safe" is a misleading and false claim.
- 4) As per Mandatory Labeling, PR Notice 2000-5, revise the following:
  - a. Delete "should" in the second sentence of the Pesticide Storage and state "must."
  - b. Revise the third sentence in the Pesticide Storage to read: "In case of spills, absorb with sawdust or sand and dispose of in a sanitary landfill."

- c. In the first or second sentence in each site in the direction for use, revise the sentences instructing the customer to clean prior to applying the product to remove the word "should" and have these sentences read in the following manner: "prior to its use [for maximum effectiveness]..., clean/remove [bacterial slime/heavy growths of algae/other deposits] in the systems."
- d. Revise the third sentence of the Industrial Air Washing Systems section to read: "Use an initial slug dose of 3.33-5.55 fluid ounces of Clearaid ScP per 1000 gallons of water."
- e. Delete "should" and state "must" in the 5<sup>th</sup> and 6<sup>th</sup> sentences of the Decorative/Ornamental Water Systems section.

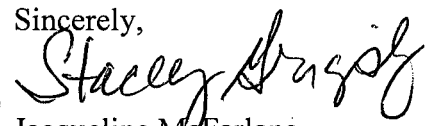
**General Comments**

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, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at [carl.jaclyn@epa.gov](mailto:carl.jaclyn@epa.gov).

When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



*J* Jacqueline McFarlane  
 Product Manager (34)  
 Regulatory Management Branch II  
 Antimicrobials Division (7510P)

Please read instructions on reverse before completing form

Form Approved, OMB No. 2070-0060, Approval expires 5-31-98



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input checked="" type="checkbox"/>	Amendment
<input type="checkbox"/>	Other

OPP Identifier Number

**Application for Pesticide – Section I**

1. Company/Product Number 63838-8	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Clearaid SCP	PM # 34	
5. Name and Address of Applicant (Include ZIP Code) Enviro Tech Chemical Services, Inc. 500 Winmoore Way Modesto, CA 95358  <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg No. _____ Product Name _____

**Section - II**

<input checked="" type="checkbox"/> Amendment – Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input type="checkbox"/> Notification – Explain below	<input type="checkbox"/> Other – Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

Submission to add a new claim for "water based metal working and cutting fluids". This is an old claim that exists on other labels.

Contact Person: Michael Harvey (mikeharvey@envirotech.com) tel.: 209-581-9576 x1104; Fax 209-581-9653

**Section III**

1. Material This Product Will be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
<b>*Certification must be submitted</b>		If "Yes" Unit Packaging wt.	No. per container	If "Yes" Package wt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 55 gallons		5. Location of label directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section IV**

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name MICHAEL HARVEY	Title REGULATORY OFFICER	Telephone No. (Include Area Code) 209-581-9576 ext. 104
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law		6. Date Application Received (Stamped)
2. Signature 	3. Title President	
4. Typed Name Michael Harvey	4. Date September 6, 2011	



# CLEARAID™ SCP

## ACTIVE INGREDIENT:

Poly [oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] ..... 60.0%  
 INERT INGREDIENTS ..... 40.0%  
 TOTAL ..... 100.0%

## KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
<b>If in Eyes</b>	-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 further treatment advice.
<b>If on Skin</b>	-Take off contaminated clothing. -Rinse skin immediately with plenty of water for 15-20 minutes. -Call a poison control center or doctor for further treatment advice.
<b>If Swallowed</b>	-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.
<b>If Inhaled</b>	-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. -Call a poison control center or doctor for further treatment advice.
<b>HOTLINE NUMBER</b> Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.	

**IN CASE OF EMERGENCY ENDANGERING LIFE OR PROPERTY, CALL: 800-424-9300**

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### CAUTION:

Avoid contact with eyes, skin or clothing. Harmful if swallowed. Avoid breathing vapors.  
 Wash thoroughly with soap and water after handling.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds or 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 discharging. 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:** Do not stack more than four (4) drums high. Leaking or damaged drums should be placed in over-pack 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:** Nonrefillable container. Do not use this container to hold materials other than pesticides or dilute pesticides (rinseate). After emptying and cleaning, it may be allowable to temporarily hold rinseate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. Clean container promptly after emptying. Offer for recycling if available. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinseate into application equipment or a mix tank or store rinseate for later use or disposal. Repeat this procedure two more times.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Clearaid SCP is used to control the growth of algae in swimming pools, heated swimming pools, exterior whirlpools, hot baths, and decorative fountains and ponds. It is used to control algae, bacteria, and fungi in recirculating commercial and industrial cooling water towers and as a preservative for aqueous metalworking fluids.

### COOLING WATER TOWERS

Prior to using Clearaid SCP in cooling water towers, systems should be cleaned to remove algal growth, microbiological slime, and other deposits. Then make an initial slug addition of 0.9-2.2 fluid ounces of Clearaid SCP per 1000 gallons of water to provide 8-20 ppm Clearaid SCP, based on the total weight of water in the system. Repeat initial dosage until control is evident. Make subsequent slug additions of 0.2-2.2 fluid ounces of Clearaid SCP per 1000 gallons of water (2-20 ppm) every 2-5 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 cooling water tower sump.

### INDUSTRIAL AIR WASHING SYSTEMS

Clearaid SCP 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 3.33-5.55 fluid ounces of Clearaid SCP per 1000 gallons of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 2.25-5.55 fluid ounces of Clearaid SCP per 1000 gallons of water should be employed every 1-5 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 water collection trays of the air wash system.

### SWIMMING POOLS; HEATED SWIMMING POOLS, EXTERIOR WHIRLPOOLS, AND HOT BATHS

For maximum effectiveness of Clearaid SCP in swimming pools, heated swimming pools, exterior whirlpools, and hot baths, those with heavy growths of algae should be cleaned prior to using Clearaid SCP. For pools having just visible algae growth, add an initial dose of 11-17 fluid ounces of Clearaid SCP per 10,000 gallons of water and remove settled algae debris by cleaning. For treatment of a freshly cleaned and filled pool, add initially 6-11 fluid ounces of Clearaid SCP per 10,000 gallons of water. To maintain pools free of visible algae growth, subsequent additions of 2-4 fluid ounces of Clearaid SCP per 10,000 gallons of water should be made every 5-7 days after the initial treatment.

Uniform distribution of Clearaid SCP throughout the water in the pool is necessary for maximum effectiveness. Clearaid SCP is compatible with those chemicals normally used to treat pools and is effective at both acid and alkaline pH. Clearaid SCP can be used in pools treated with chlorine chemicals and may reduce the amount of those chemicals normally required. However, do not mix Clearaid SCP with concentrated dry or liquid chlorine products.

### DECORATIVE/ORNAMENTAL WATER SYSTEMS

Clearaid SCP is used to control the growth of algae in fresh or recycled water features, ponds and lined reservoirs for non-potable uses. Systems containing heavy growths of algae should be manually cleaned prior to treatment. Systems with just-visible algae growth require an initial dose of 1.0-2.0 fluid ounces of Clearaid SCP per 1000 gallons of water in the system. To treat a freshly cleaned and filled system, add 0.5-1.5 fluid ounces of Clearaid SCP per 1000 gallons of water. Maintenance dosages of 0.2-0.5 fluid ounces of Clearaid SCP per 1000 gallons of water should be added as needed every 5-7 days, or on a continuous basis for larger systems. Additions of Clearaid SCP should be made at a point to ensure uniform distribution throughout the system. Clearaid SCP may be used in systems treated with chlorine chemicals and may reduce the amount of those chemicals normally required, but do not mix Clearaid SCP with concentrated dry or liquid chlorine products.

### PAPER MANUFACTURE

**Pulp, Paper, and Paperboard Mills:** This product is only for use in non-food applications, such as Brown Paper mills, Sheet for Corrugated Board, Kraft Paper, newsprint and similar paper/paperboard not intended for food contact uses. Clearaid SCP will retard microbial growth that causes degradation of cooked starch used in paper manufacture. Clearaid SCP is added at a rate of 25-250 ppm based on the total weight of the starch and water. The treatment rate necessary to retard spoilage of the starch will vary with the extent of contamination of the make-up water and the length of storage.

### WATER BASED METALWORKING AND CUTTING FLUIDS

May be used for the inhibition of bacterial degradation of aqueous solutions or emulsions employed as lubricants or coolants in the machining and processing of metals. This product is safe to use with fluids based on amines, borates, phosphates, nitrates and similar formulas. Do not use with insoluble oil or straight oils or with fluids or products that contain anionic detergents/surfactants. For the preservation of aqueous cutting fluids or emulsions add this product at the rate of 0.01-0.1 % by volume to the volume of diluted cutting or metalworking fluid. It may be necessary to retreat the cutting fluid every 2-4 weeks. The treatment amount and frequency may be adjusted in each situation by using bacteriological testing procedures to confirm efficacy.

Manufactured by:

**ENVIRO TECH CHEMICAL SERVICE ACCEPTED**  
 500 Winmoore Way  
 Modesto, CA 95358 USA  
 209-581-9576  
**with COMMENTS**  
**in EPA Letter Dated**  
**SEP 28 2011**

EPA Est. No. 63838-CA-01  
 EPA Reg. No. 63838-8

Item 041x- V3

Under the Federal Insecticide, Fungicide, and Rodenticide Act amended, for the pesticide, registered under EPA Reg. No. 63838-8

Net Contents: \_\_\_\_\_ lbs/kgs

63838-8

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