

68708-6

02/19/2010

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

FEB 19 2010

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Juli Mann
Paralegal Specialist for,
Nalco Company
1601 West Diehl Road
Naperville, IL 60563

Mail to: Juli Mann
Steptoe and Johnson LLP
1330 Connecticut Ave., NW
Washington, D.C. 20036

Subject: EC6106A
EPA Registration Number 68708-6
Your Notification Dated January 19th, 2010
EPA Received Date January 20th, 2010

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to update the label as per PR Notices 2007-4 and 98-10, update name and address of company and update the establishment number, is acceptable.

The notification has been made part of the file.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

A handwritten signature in cursive script that reads "M Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobials Division(7510P)

Please read instructions on reverse before completing form

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



United States
Environmental Protection Agency
Washington, DC 20460

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

Application for Pesticide - Section I

1. Company/Product Number 68708-6	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) EC6106A	PM # 33	
5. Name and Address of Applicant (Include ZIP Code) Nalco Company 1601 West Diehl Road Naperville, IL 60563 <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 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 checked="" type="checkbox"/> Notification - Explain below	<input type="checkbox"/> Other - Explain below

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

Notification of label changes to incorporate revised container disposal statements per PR Notice 2007-4 and additional minor label revisions per PR Notice 98-10.

This notification is consistent with the guidance in PR Notice 2007-4 and PR Notice 98-10 and the requirements of EPA's regulations at 40 CFR §§ 152.46, 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 152.46, 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

FORWARD CORRESPONDENCE for this action to: Juli Mann, Steptoe & Johnson LLP, 1330 Connecticut Ave., NW, Washington, D.C. 20036.

Section III

1. Material This Product Will be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal - epoxy lined	
*Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
					<input type="checkbox"/> Glass
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of label directions <input 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 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 Juli Mann	Title Paralegal Specialist, Steptoe & Johnson, LLP, Authorized agent	Telephone No. (Include Area Code) 202-429-3095
Certification 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 Paralegal Specialist, Agent for Nalco Company	
4. Typed Name Juli Mann	5. Date January 19, 2010	

STEPTOE & JOHNSON LLP

ATTORNEYS AT LAW

3/4

WRITER'S DIRECT DIAL
202.429.3095

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

January 19, 2010

Via Hand Delivery

Marshall Swindell, Product Manager 33
Antimicrobials Division (AD)
c/o Document Processing Desk (NOTIF)
Office of Pesticide Programs (7510P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Re: Notification to update label per PR Notices 2007-4 and 98-10

Product: EC6106A (EPA Reg. No. 68708-6)

Dear Marshall:

On behalf of our client, Nalco Company, enclosed please find a notification for **EC6106A** to update the container handling statements per PR Notice 2007-4 and make the following changes per PR Notice 98-10:

- Update the registrant name and address
- Update establishment number information

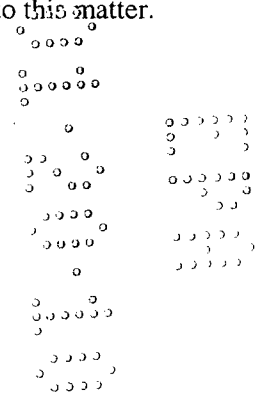
This notification is consistent with the guidance in PR Notice 2007-4 and PR Notice 98-10.

Enclosed is EPA Form 8570-1, with the required certification statement, along with one copy of the proposed label with changes highlighted. Please let me know if you have any questions or need anything further.

Correspondence for this matter should be sent to me at the Washington, D.C. address identified above. If you require any further information please contact me at (202) 429-3095. Thank you for your attention to this matter.

Sincerely,

Juli Mann
Juli Mann
Paralegal Specialist



PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. CAUSES EYE AND SKIN DAMAGE. Harmful or fatal if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield, rubber gloves and protective clothing when handling. Avoid contamination of food.

PHYSICAL AND CHEMICAL HAZARDS

FLAMMABLE. Keep away from heat and open flame.

PHYSICAL PROPERTIES

Specific gravity.....0.934
Freezing point.....-10°F
Soluble in fresh and salt water

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

STORAGE AND DISPOSAL

STORAGE: EC6106A should be stored in an area approved for flammable products. Keep drum openings capped to prevent evaporation or product contamination. Loss of solvent can result in gelling. Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE DISPOSAL: Pesticide wastes are acutely 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.

Instructions for refillable containers:

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 before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling, if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedure approved by state and local authorities.

Instructions for non-refillable containers greater than 5 gallons:

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) container promptly after emptying. Triple rinse as follows: Empty 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, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedure approved by state and local authorities.

Instructions for non-refillable containers 5 gallons or less:

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) container promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedure approved by state and local authorities.



A MICROBIOCIDICIDE FOR USE IN CONTROLLING BACTERIA IN OILFILED APPLICATIONS

ACTIVE INGREDIENT:

Alkyl* -1,3-propylenediamine..... 30.1%
INERT INGREDIENTS..... 69.9%
Total.....100.0%

*3% C₈, 3% C₁₀, 41% C₁₂, 15% C₁₄, 10% C₁₆, 28% C₁₈

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID

- IF IN EYES: Hold eyes 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 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 by a poison control center or doctor.
 - IF ON SKIN: 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 ambulances, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice
- NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed. Have the MSDS with you when calling a poison control center or a doctor, or going for treatment.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

EPA Reg. No. 68708-6

EPA Establishment Numbers are as follows. (Letters in () that match prefix in batch number identify the establishment number.)

EPA Est. No. 68708-CA-1 (CR); 68708-LA-1 (ST);

68708-OK-1 (TU); 68708-TX-1 (SL); 68708-TX-3 (DS); 68708-UT-2 (VR); 68708-WY-1 (EV)

SOLD BY: Nalco Company

1601 West Diehl Road
Naperville, IL 60563-1198

EMERGENCY TELEPHONE NUMBER (800) 424-9300

DIRECTIONS FOR USE

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

USE WITH CLOSED DELIVERY SYSTEMS ONLY

EC6106A is a combination bactericide and corrosion inhibitor. It is particularly effective in killing sulfate-reducing bacteria such as *Desulfovibrio desulfuricans*, as well as slime forming bacteria. It is also an excellent inhibitor against corrosion by hydrogen sulfide, carbon dioxide, acids and salts due to its ability to form tenacious films on metal surfaces.

WATERFLOODS AND SALT WATER DISPOSAL SYSTEMS

Continuous: Using a suitable chemical pump, inject EC6106A at 10-50 ppm (approximately 0.4-2.0 gallons per 1000 barrels water) at a point of good mixing such as the flowline upstream of the injection pump.

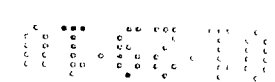
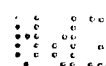
Batch or Slug: Inject 50-200 ppm EC6106A (approximately 2-8 gallons per 1000 barrels water) for up to 16 hours once or twice a week, or as needed to maintain control of the system.

Combination: This variation may be needed to combat severe bacterial problems. For example, use weekly batch treatments upstream of filter (at heater treaters, water collection tanks, or flowlines), plus continuous treatment after the filters at 10-25 ppm (0.4-1.0 gallons EC6106A per 1000 barrels water).

PACKER FLUIDS, AND WORKOVER FLUIDS

While the fluid is being made up, inject EC6106A via a suitable chemical pump at a point of good mixing. Add chemical at a rate of approximately 1200-2400 ppm (5-10 gallons per 1000 barrels, or approximately 1-2 drums per 1000 barrels).

NET CONTENTS SHOWN ELSEWHERE ON CONTAINER



[Batch/Lot Number: _____]

Note to EPA Reviewer: Batch/Lot Number may or may not appear on label.

h/jh