

70506-189

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

JUN 24 2010

United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA
19406

Attention: Timothy M. Formella

Subject: TD2335 Industrial Biocide-Molluscicide
EPA Registration No: 70506-189
Notification Dated June 1, 2010

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c) (9).

Proposed Notification

- To revise Storage and Disposal statement per PR Notice 2007-4

General Comments

Base on a review of the submitted material, the following comments apply:

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

If you have any questions concerning this letter, please contact Zebora Johnson at (703) 308-7080.

Sincerely

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

Marshall Swindell
Product Manger (33)
Regulatory Management Branch I
Antimicrobial's Division (7501P)

TD2335 Industrial Biocide-Molluscicide

ACTIVE INGREDIENT:

Mono(N,N-dimethylalkylamine**) salt of endothall* 53.0%

OTHER INGREDIENTS: 47.0%

TOTAL: 100.0%

Contains 2 lb. Technical endothall* per gallon
*7-oxabicyclo [2.2.1] heptane-2,3-dicarboxylic acid equivalent 23.36%
** Alkyl as in fatty acids of coconut oil

KEEP OUT OF REACH OF CHILDREN DANGER

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 advice.

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 ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- 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.

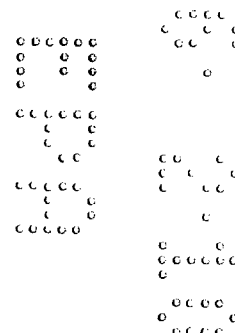
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

EPA Registration No. 70506-189

EPA Establishment No. _____

Net Contents 30 Gallons/113.5 Liters

United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE AND SKIN BURNS. MAY BE FATAL IF SWALLOWED OR ABSORBED THROUGH SKIN. HARMFUL IF INHALED. DO NOT GET IN EYES, ON SKIN OR ON CLOTHING. AVOID BREATHING VAPOR OR SPRAY MIST. WEAR PROTECTIVE CLOTHING, RUBBER GLOVES, AND GOGGLES OR FACE SHIELD WHEN HANDLING. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT

Workers who will come in contact with the concentrated product must wear:

- Coveralls over long-sleeved shirt and long pants
- Waterproof gloves
- Protective eyewear
- Chemical-resistant footwear plus socks

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/ maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing.

As soon as possible, wash thoroughly and change into clean clothing.

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 Systems (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewage systems without previously notifying the local sewage treatment authority. For guidance contact your State Water Board or Regional Office of the EPA.

GENERAL INFORMATION

TD2335 Industrial Biocide-Molluscicide is a liquid concentrate soluble in water. The active ingredient of this product is highly effective in controlling established populations of freshwater and saltwater mollusks, and in preventing settlement of the immature forms of these mollusks. TD2335 Industrial Biocide-Molluscicide has activity against various slime organisms in systems that recirculate water.



The toxicity of TD2335 Industrial Biocide-Molluscicide to freshwater and saltwater mollusks is dependent on rate of application and the time of exposure. In lab studies, treatments of TD2335 Industrial Biocide-Molluscicide at 2.3 ppm for 6-7 hours were equivalent to those at 5 ppm for 2 hours. TD2335 Industrial Biocide-Molluscicide rapidly dissipates in water. Degradation in the environment is microbial only; it does not hydrolyze or photolyze in an aquatic environment. TD2335 Industrial Biocide-Molluscicide does not require a holding period or deactivation after use.

DIRECTIONS FOR USE

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

For control of established populations of freshwater and saltwater mollusks in recirculating and once-through cooling water systems. TD2335 Industrial Biocide-Molluscicide should be applied at 3.0 to 0.3 ppm endothall technical (equivalent to 24 to 2.4 gallons per 1,000,000 gallons of water) for six to one hundred forty hours of exposure.

TD2335 Industrial Biocide-Molluscicide can be metered directly into the system with a positive displacement pump or into a flow of dilution water for use in a distribution header. One continuous application should be made at a convenient point of uniform mixing, such as a basin area, pump area or other reservoir or collecting area from which treated water will be circulated uniformly throughout the system.

Higher rates of application and exposure times are required for heavy populations of fouling mollusks and/or with cooler water temperatures (less than 70°F).

TD2335 Industrial Biocide-Molluscicide has also shown potential for treating service water, auxiliary water, waste water, influent and fire protection water systems.

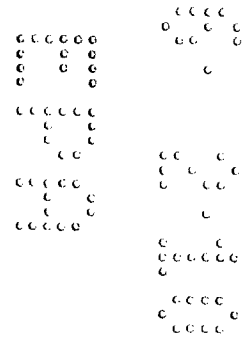
Suspension of the blow down from cooling towers for six to twelve hours after TD2335 Industrial Biocide-Molluscicide application and/or segmenting plant-wide treatments will reduce the level of product remaining in the effluent.

EMERGENCY TELEPHONE NUMBERS

CHEMTREC: (800) 424-9300

MEDICAL: (866) 673-6671

Rocky Mountain Poison Control Center



STORAGE AND DISPOSAL

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

Pesticide Storage: Store in the original container. Do not store in a manner where cross-contamination with other biocides could occur. In the event of spillage during handling or storage, absorb with sand or other inert material and dispose of absorbent in accordance with the Pesticide Disposal Instructions for your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office.

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.

Container Handling:

(for Nonrefillable containers)

Nonrefillable container. Do not reuse or refill this container. Triple rinse or pressure rinse container promptly after emptying.

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 rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

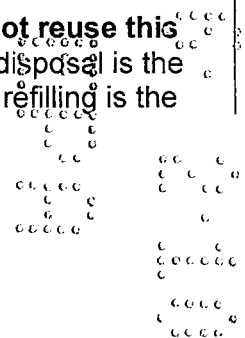
or

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

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.

(for Refillable Porta-Feed containers)

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 if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**IMPORTANT INFORMATION
READ BEFORE USING PRODUCT**

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product reflect the opinion of experts based on field use and tests, and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of United Phosphorus, Inc. or Seller. Handling, storage, and use of the product by Buyer or User are beyond the control of United Phosphorus, Inc. and Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold United Phosphorus, Inc. and Seller harmless for any claims relating to such factors.

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United Phosphorus, Inc. and Seller offer this product, and Buyer and User accept it, subject to

