

74655-24

12/14/2012

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

December 14, 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Kate Ingram
Ashland Incorporated
7910 Baymeadows Way, Suite 100
Jacksonville, FL 32256

Subject: **Wrico BGA**
EPA Registration No.: 74655-24
Application Date: 11/07/2012
Receipt Date: 11/09/2012

Dear Ms. Ingram:

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

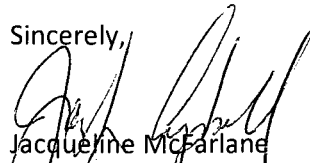
Proposed Amendment

- Minor label revisions
- Addition of trademark symbol to product name
- Removal of phrase "net contents on drum"

General Comments

A stamped label 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 or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at 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,

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

WRICO™ BGA microbiocide

ACTIVE INGREDIENT

Potassium salt of Ortho-benzyl-para-chlorophenol.....23.5%

INERT INGREDIENTS.....76.5%

TOTAL.....100.0%

EPA Reg. No. 74655-24

EPA Est. No. 74655-TX-1

EPA Est. No. 18533-KS-1

EPA Est. No. 50522-TX-001

EPA Est. No. 74655-GA-001

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 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 further treatment advice.

IF INHALED

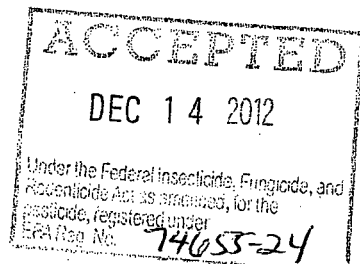
Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF 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 do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

**In case of emergency call toll free:
1-800-274-5263 or 1-800-ASHLAND**

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



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

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE AND SKIN BURNS. HARMFUL IF SWALLOWED OR ABSORBED THROUGH THE SKIN.

Do not get in eyes, skin, or on clothing. Avoid breathing spray mist. Users must wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

Applicator and other handlers must wear long-sleeved shirt and long pants; socks and shoes; goggles or face shield; chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton.)

Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instructions for washables exist use detergent and hot water. Keep and wash PPE separately from other laundry. If pesticide gets inside clothing, remove clothing immediately, wash thoroughly, and put on clean clothing. Users must 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 HAZARD

This pesticide 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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store drums in well ventilated, dry area.

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 Regional Office of the EPA for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Offer for reconditioning, if appropriate. 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. 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.

FOR INDUSTRIAL USE ONLY

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Badly fouled systems should be cleaned before treatment is begun.

INDUSTRIAL RECIRCULATING WATER SYSTEMS

For control of bacteria and algae in industrial cooling towers and evaporative condensers, treat the system with 6.4 – 25.6 fluid ounces of this product per 1000 gallons of water in the system.

INITIAL DOSE: When the system is noticeably fouled, add 13.0 – 25.6 fluid ounces of this product per 1000 gallons of water in the system. Repeat until control is evident.

SUBSEQUENT DOSE: When microbial control is evident add 6.4 – 12.8 fluid ounces of this product per 1000 gallons of water in the system as needed to maintain control.

INDUSTRIAL PROCESS WATER SYSTEMS

For control of bacteria in industrial process water systems, treat the system with 6.4 – 25.6 fluid ounces of this product per 1000 gallons of water in the system.

IMPORTANT NOTICE: SELLER WARRANTS THAT THE PRODUCT CONFORMS TO ITS CHEMICAL DESCRIPTION. ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, ARE DISCLAIMED. BUYER ACCEPTS FULL RESPONSIBILITY FOR COMPLIANCE WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL LAWS AND REGULATIONS.

Hercules Incorporated, A wholly owned subsidiary of Ashland Inc.
500 Hercules Rd
Wilmington, DE 19808
(302) 594-5000
Emergency Phone Number
1-800-ASHLAND (1-800-274-5263)