

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 18, 2016

Melissa McWilliams Product Manager Bulk Chemical Services, LLC 1303 Boyd Avenue, NW Atlanta, GA 30318

Subject: Label Amendment – Updating directions for use and precautionary statements

Product Name: BCS 3502A

EPA Registration Number: 82760-1 Application Date: March 25, 2016

Decision Number: 515718

Dear Ms. McWilliams:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2 EPA Reg. No. 82760-1 Decision No. 515718

with FIFRA section 6. If you have any questions, please contact Joe Daniels by phone at (703) 347-6240, or via email at daniels.joseph@epa.gov.

Sincerely,

Julie Chao, Product Manager 33 Regulatory Management Branch 1 Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure: Accepted Label

KEEP OUT OF REACH OF CHILDREN DANGER

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage. Causes skin burns. May be fatal if swallowed. Harmful if inhaled. Harmful if absorbed through skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Causes asthmatic signs and symptoms in hyper-reactive individuals. Do not get in eyes, on skin, on clothing. Do not swallow. Avoid breathing vapor. Wear goggles, protective clothing, and butyl or nitrile gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment

Applicators and other handlers must wear:

-Coveralls, over long-sleeved shirt and long pants

-socks and chemical resistant footwear

-goggles or face shields

-Chemical-resistant gloves (such as butyl rubber, nitrile/butadiene rubber)

User Safety Requirements

Follow manufacturers' instructions for cleaning & maintaining PPE if no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Users must wash hands before eating, drinking, chewing gum or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then 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 HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, oysters and shrimp. 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 HANDLING

Storage: To maintain product quality, store at temperatures below 80°F (26.7°C). Keep container tightly closed when not in use.

Handling: BCS 3502A is incompatible with many commonly used materials of constructions such as steel, galvanized iron, aluminum, tin, and zinc, BCS 3502A can be reinforced epoxy-plastic equipment. This product freezes at about 16°F (-9°C). Therefore, unless the storage tank is inside or underground, heating and insulation may be required. If patient. heating is needed, exposure to high temperatures should be avoided. For short storage times (up to about 1 month), temperatures of up to 100°F (37.8°C) can be tolerated.

A stainless steel centrifugal pump is suggested for transfer service. Spiral-wound stainless steel with TEFLON® Polymer is suitable for gaskets and packing.

Handle in a well-ventilated area. If vapors are irritating to the nose or eyes, special ventilation or respiratory protection (MSHA/NIOSH approved air purifying respiration equipped with an organic vapor cartridge) may be required.

The product in its undiluted form must not be used in a spray, or aerosol application.

STORAGE AND DISPOSAL

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

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 DISPOSAL

Option – labels for non-refillable rigid containers of all sizes

Nonrefillable Container: Do not reuse or refill this container. Triple or pressure rinse container (or equivalent) promptly after emptying then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Option – labels on refillable rigid containers of all sizes

Refillable Container: Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning of 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 container before final disposal, empty contents into application equipment and triple rinse. Pour or pump rinsate into application equipment or rinsate collection system. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

BCS 3502A

Active Ingredient: Glutaraldehyde. Inert Ingredients..

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

If swallowed

- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor

Hold eye open and rinse slowly and gently with water for 30 minutes.

- Do not give anything to an unconscious person.
- Call a poison control center of doctor immediately for treatment advice.
- If in eyes:
 - Remove contact lenses if present after the first 5 minutes then continue
 - Call a poison control center or a doctor immediately 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 a doctor for treatment advice.

If inhaled:

- Move person to fresh air
- If person is not breathing, call 911 or an ambulance, and then give artificial respiration, using pocket mask or face protection if via mouth-to-mouth.
- Call a poison control center or a doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or a doctor or going for treatment.

IN CASE OF EMERGENCY endangering life or property involving this product, call 800-

NOTE TO PHYSICIAN: Inhalation, ingestion or aspiration may cause lung or GI-tract damage. Probable mucosal damage may contraindicate the use of gastric lavage. stored and handled in baked phenolic-lined steel, polyethylene, stainless steel, or Chemical eye burns may require extended irrigation. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the

EPA Reg. No. 82760-1



ACCEPTED

Apr 18, 2016

nder the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 82760-1

Net Contents: 5, 15, 30, 55, 275, 330 gallons or Bulk

CONTAINER SIZE: NET WEIGHT Select Size Select Weight LOT NUMBER: Enter Lot Number

DIRECTIONS FOR USE

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

INDUSTRIAL OR COMMERCIAL COOLING WATER SYSTEMS

Not registered for this use in the State of California Not intended for use in once-through cooling systems

For control of microbial growth in industrial or commercial cooling water systems use either

continuous or slug dosing. CONTINUOUS FEED

Add product to metering device for continuous feed. Add 20 to 200 ppm per day of product to the water in the system depending on the severity of contamination. Badly fouled systems must be cleaned before treatment. Do not exceed more than 200 ppm product in system water per day.

Add product to basin of cooling system or at any other point of uniform mixing. Add 40 to 200 ppm product to the water in the system depending upon severity of contamination. Repeat as needed to maintain control. Badly fouled systems must be cleaned before treatment.

SERVICE WATER AND AUXILIARY SYSTEMS Not registered for this use in the State of California

For control of microbial growth in service and auxiliary water systems use either continuous or slua dosina.

CONTINUOUS FEED

Add product to metering device for continuous feed. Add 20 to 200 ppm per day of product to the water in the system depending on the severity of contamination. Badly fouled systems must be cleaned before treatment. Do not exceed more than 200 ppm product in system water per day.

Add product to basin of cooling system or at any other point of uniform mixing. Add 40 to 200 ppm Oil and Gas Water Storage and Transmission Systems product to the water in the system depending upon severity of contamination. Repeat as needed o maintain control. Badly fouled systems must be cleaned before treatment.

AIR-WASHER SYSTEMS

Not registered for this use in the State of California

NOTE: For use only in industrial air-washer systems that maintain effective mist eliminating components. For control of microbial growth in air washer systems use either continuous or slug

CONTINUOUS FEED

Add product using metering device for continuous feed. Add 20 to 200 ppm per day of product to the water in the system depending on the severity of contamination. Badly fouled systems must be cleaned before treatment. Do not exceed more than 200 ppm product in system water per day.

Add product to basin of cooling system or at any other point of uniform mixing. Add 40 to 200 ppm product to the water in the system depending upon severity of contamination. Repeat as needed o maintain control. Badly fouled systems must be cleaned before treatment.

ULTRA FILTRATION AND NON-MEDICAL REVERSE OSMOSIS MEMBRANE SYSTEMS

Not registered for this use in the State of California Not intended for use in once-through cooling systems.

Use only for industrial process water. Verify membrane compatibility with membrane manufacturer

CONTINUOUS FEED

Add product to metering device for continuous feed. Add 20 to 200 ppm per day of product to the 540 ppm product to the metalworking fluid system. Repeat until control is achieved water in the system depending on the severity of contamination. Badly fouled systems must be cleaned before treatment. Do not exceed more than 200 ppm product in system water per day.

Add product to basin of cooling system or at any other point of uniform mixing. Add 40 to 200 ppm product to the water in the system depending upon severity of contamination. Repeat as needed to maintain control. Badly fouled systems must be cleaned before treatment.

EPA Est. No. 82760-GA-001 INDUSTRIAL WASTEWATER SYSTEMS

BCS 3502A must be added to a wastewater system or wastewater sludge at a convenient point of uniform mixing such as the digester. Add 450 to 2,250 ppm of product to the wastewater or

BEET SUGAR MILLS AND BEET SUGAR MILL PROCESS WATER SYSTEMS

BCS 3502A must be added to the system at a point of uniform mixing such as the diffuser, transport water pump, weir box, or diffuser feed water pump. For control of microbial growth use either continuous or slug dosing.

CONTINUOUS FEED

Add product to metering device for continuous feed. Add 30 to 500 ppm per day of product to the water in the system depending on the severity of contamination. Badly fouled systems must be At no time during the preservation process should the level of BCS 3502A exceed 2%. cleaned before treatment. Do not exceed more than 500 ppm product in system water per day. SLUG DOSING

Add product to basin of cooling system or at any other point of uniform mixing. Add 30 to 500 ppm product to the water in the system depending upon severity of contamination. Repeat as needed to maintain control. Badly fouled systems must be cleaned before treatment.

PAPER MILLS AND PAPER MILL PROCESS WATER SYSTEMS

BCS 3502A must be added to the paper making system at a point of uniform mixing such as the BCS 3502A by periodic addition to counteract any system leakage. beaters, broke chest pump, save-all tank, or white-water tank.

Initial Dose: When the system is noticeably contaminated, add 0.5 to 3.0 lbs of BCS 3502A per CONCRETE ADMIXTURES ton of pulp or paper (dry basis) as a slug dose. Repeat until control is achieved. Heavily fouled systems should be boiled out prior to initial treatment.

Subsequent Dose: When microbial control is evident, add 0.3 to 2.0 lbs of BCS 3502A per ton of pulp or paper (dry basis) as a slug dose as necessary to maintain control.

PIGMENTS AND FILLER SLURRIES FOR PAPER AND PAPERBOARD (For use in food and non-food contact pigments and filler slurries)

Add 100 to 600 ppm BCS 3502A (based on slurry solids) in the mixed slurry.

WATER BASED COATINGS FOR PAPER AND PAPERBOARD

NOTE: For use in non-food contact coatings only.

Add 100 to 600 ppm BCS 3502A (based on slurry solids) in the mixed slurry.

Oil and Gas Production Uses

At a point of uniform mixing, apply BCS 3502A at a concentration within the stated dosing range for the relevant product application. Subsequent treatments can be applied, as needed, to maintain an effective microbial control concentration, within the described dosage range. The stated concentration ranges provide microbial control of microorganisms at differing levels of

Drilling, Completion, and Workover Fluids

Not registered for this use in the State of California

Add 125 to 2500 ppm product to the freshly-prepared fluid system. Subsequent treatments may be applied, as needed, to maintain a concentration of 50 to 1000 ppm due to fluid reuse or turn

Packer Fluids

Add 50 to 600 ppm product to a circulating packer fluid to ensure uniform mixing. Seal the treated packer fluid in the wall between the casing and production tube.

Fracturing Fluids

Not registered for this use in the State of California

Add 100 to 5,000 ppm product at any point in the production or application of the fracturing fluid to reduce bacterial contamination and fracturing fluid degradation.

Water Floods and Enhanced Oil Recovery Fluids

Not registered for this use in the State of California

Intermittent or continuous dosing can be applied to the fluid to achieve a concentration of 20 to 5,000 ppm product for effective microbial control.

Injection Waste Fluids

Not registered for this use in the State of California

Add 100 to 5,000 ppm product to the waste fluid prior to or at injection into an approved disposal

Not registered for this use in the State of California

Add 100 to 10,000 ppm product to the water storage or transmission system as needed to maintain microbial control

Gas Storage Wells and Systems

Individual injection wells should be treated to produce a concentration of 500 to 5.000 ppm product based on the water volume present in the system. Yearly treatments should be applied to maintain effective microbial control. Individual drips should contain 200 to 2000 ppm as needed to maintain microbial control.

Hydrotesting

Water used to hydrotest pipelines or vessels should contain 100 to 4,000 ppm per product. Pipeline Pigging and Scraping Operations

Add the appropriate volume of product to achieve a concentration of 1,000 to 10,000 ppm product n the water slug applied immediately following the scraper.

Hydrocarbon Production, Storage and Transmission Systems

Not registered for this use in the State of California Add via direct injection to achieve a concentration of 1,000 to 10,000 ppm product based on the volume of water in the system. For pipeline uses, after application and complete distribution throughout the pipeline, a detectable amount of residual product should be present at the back end of the pipeline system.

AQUEOUS METAL WORKING FLUIDS

BCS 3502A must be added to a metalworking fluid system at a point of uniform mixing such as the fluid collection tank. Badly fouled systems should be cleaned before treatment is begun. Add 72 to

WATER BASED CONVEYOR LUBRICANTS

(Brewery, Juice, Dairy, Beverage, and Food Processing Systems) Avoid contamination of food in application of product.

Thoroughly clean all tracks and conveyors to remove gross soil. Rinse well.

Add 100 to 600 ppm product to the diluted lubricant.

GENERAL PRESERVATIVE USE

BCS 3502A is recommended for use in aqueous or water containing products and systems, including industrial, institutional, and consumer in-can processes and products, to control the growth of bacteria and fungi. For effective preservation, add BCS 3502A to the product ormulation at a rate of 0.02% to 0.20% (200 to 2,000 ppm) based on the water content of the product (0.2 to 2.0 lbs BCS 3502A per 1,000 lbs water content). Mix uniformly.

PRESERVATIVE FOR CONCENTRATES

For use in concentrates where effective preservation is needed after dilution, add BCS 3502A to the product formulation at a rate such that the diluted end-use product will contain 0.02% to 0.20%

REVERSE OSMOSIS MEMBRANES ELEMENT PRESERVATION

For effective preservation of reverse osmosis elements (where approved for compatibility by membrane manufacturer), immerse elements in a tank containing 0.2% to 2.0% BCS 3502A. BCS 3502A can also be added to in-line recirculating systems for preservation of installed out-ofservice reverse osmosis equipment (where approved for compatibly by membrane manufacturer). Add 0.2% to 2.0% BCS 3502A to the tank in the circulating system. Maintain the concentration of

For effective preservation of concrete admixtures, add BCS 3502A to the product formulation at a rate of 2,000 to 8,000 ppm based on the weight of the admixture (2.0 to 8.0 lbs of BCS 3502A per 1.000 lbs concrete admixture). Mix uniformly

Notice: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the Directions. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR