

83451-9

7/7/2009

1 of 11

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

BWA Water Additives U.S. LLC
1979 Lakeside Parkway, Suite 925
Tucker, GA 30084

JUL 07 2009

Attention: Ross Beattie
Product Registration Specialist

Subject: Bellacide 325
EPA Registration No. 83451-9
Notification Dated June 16, 2009

This will acknowledge receipt of your notification to change the Pesticide Container Disposal language per PR Notice 2007-4, to update the company address and the product EPA Registration Number on the proposed label, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification dated June 16, 2009 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 Martha Terry at (703) 308-6217.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobials Division (7510P)

20f11

Please read instructions on reverse before completing form.

Form Approved

OMB No. 2070-0080, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☐
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Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83451-9	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 325	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives U.S. LLC 1979 Lakeside Parkway, Suite 925 Tucker, GA 30084 <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.)

Fee Determination: Fee category - Not applicable (Notification) ross.beattie@wateradditives.com

Notification to change Pesticide Container Disposal language per PR Notice 2007-4

See attached page for certification

Update Official Company Address on SAL, as confirmed by January 10, 2007 correspondence from the EPA and to update the EPA Reg. No. as detailed by August 2, 2006 correspondence from the EPA

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 <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted					
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	
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 Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ross Beattie	Title Product Registration Specialist	Telephone No. (Include Area Code) 678-802-3032
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 Product Registration Specialist, BWA Water Additives LLC	
4. Typed Name Ross Beattie	5. Date June 16, 2009	



30411
BWA Water Additives
1979 Lakeside Parkway
Suite 925
Tucker, GA 30084

Tel 678 802 3050
Fax 678 802 3024

June 16, 2009

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: Bellacide 325
EPA Reg. No.: 83451-9

Sir or Madam:

Please process the enclosed notification for the above referenced product.

The purpose of this notification is threefold:

- 1) Add language required by the Pesticide Container Rule under Storage and Disposal per PR notice 2007-4.

Enclosed are:

- a) Application for Pesticide (EPA Form 8570-1);
- b) Notification Certification Statement; and
- c) Proposed label with changes marked.

- 2) Update the company address that appears on the Stamped Accepted Label. Current EPA SAL does not reflect Official EPA Company Name and Address

Enclosed are:

- a) Copy of Confirmation of the Official EPA Company Name and Address document;
- b) Proposed label with changes marked.

- 3) Update the product EPA Registration Number on the Stamped Accepted Label. Current EPA SAL does not reflect the post-transfer Registration Number of this product.

Enclosed are:

- a) Copy of Transfer of Pesticide Registration and Data from Company Number 5185 to Company Number 83451 document
- b) Proposed label with changes marked.

EPA Registration Number: 83451-9

Registration Name: Bellacide 325

Application for Pesticide dated: June 16, 2009

Section – II

Explanation (Continued)

"Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or Confidential Statement of Formula for this product. I understand that it is a violation of the 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 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."

Moskett
June 16/09

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{All text in brackets [xxx] is optional and may or may not be included on a final label.}
{All text in braces {xxx} is administrative and will not appear on a final label.}

{Center Panel}

Bellacide® 325

**For control of algae in recirculating cooling water systems,
and in decorative and ornamental fountains.**

ACTIVE INGREDIENT:

Terbuthylazine:

2-(tert-butylamino)-4-chloro-
6-(ethylamino)-S-Triazine

4.0%

OTHER INGREDIENTS: 96.0%

TOTAL: 100.0%

EPA Reg. No. 83451-9
EPA Est. No. 55618-SC-001

update of Registration from product
transfer from 5185 (Bichlor) to
83451 (BWA) August 2, 2006

Bellacide 325
is an Aqueous Dispersion

**KEEP OUT OF REACH
OF CHILDREN**

CAUTION

Refer to Left Panel for
Additional Precautionary Statements

**BWA Water Additives US LLC.
1979 Lakeside Parkway, Suite 925
Tucker, GA 30084.
800-600-4523**

update of Off. c. al EPA
Company Name & Address
Jan 10, 2007

EMERGENCY TELEPHONE NUMBERS

MEDICAL: 877-800-5553

TRANSPORTATION: 800-424-9300

Net Weight _____

{Right Panel}

Directions for Use – Recirculating Cooling Water Systems, Decorative and Ornamental Fountains

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

Industrial Use Application Restrictions: Open pouring of this products is prohibited. Mixing, loading, and application must be with a closed system (one that prevents the chemical from contacting handlers or other persons) and during handling of the chemical personal protective equipment must be worn. Personal protective equipment includes a long-sleeved shirt, long pants, shoes, socks, and chemical-resistant gloves. A chemical-resistant apron must be immediately available during loading and application and must be worn in case of a leak, spill, or other exposure to the concentrate.

When to apply: Heavy algae growth contributes to restricted water flow in recirculating cooling water systems, thereby impairing the efficiency of the system, especially heat-exchange efficiency. Bellacide 325 alone or a combination of Bellacide 325 and chlorine or a chlorine releasing agent (such as sodium, calcium, or lithium hypochlorite) used regularly controls algae and prevents re-establishment of algae when used according to directions.

Clean badly fouled systems before treatment. It is recommended that treatment be used prior to the first signs of algal growth, or after cleaning a system whose efficiency is already impaired by algal growth. Apply at a point in the system where Bellacide 325 will be uniformly mixed, such as in the tower sump.

Bellacide 325 is compatible with other water treatment products, including polymeric anionic scale inhibitors and dispersants, has low-foaming properties, and is non-corrosive to piping and equipment.

Treat the water early in the algal growth period (typically early spring) before the system is in jeopardy of becoming fouled by algae. For maximum effectiveness, systems with heavy algae growth should be cleaned before using Bellacide 325.

Treatment of algae in recirculating cooling water systems and in decorative and ornamental fountains: Apply Bellacide 325 at a point in the system where there is good mixing such as in the cooling tower basin near the recirculating water pump or near the fountain recirculating water pump. Bellacide 325 is slow to remove algae from a system and therefore its action will reduce the risk of large algae clumps possibly clogging the distribution deck orifices or the heat exchanger of a recirculating cooling water system.

Chlorinated Systems and/or Brominated Systems

(I) Continuous addition:

Initial Treatment - To keep systems free of algae, maintain up to 3 fluid ounces per 1000 gallons of water, or about 25 ppm, of Bellacide 325 in the system water (which is equivalent to about 1 ppm active ingredient) in conjunction with either continuous dosing or regular shock doses (for example, one hour, twice a day) of 0.1 – 1 ppm free chlorine and/or bromine. In order to achieve a maintenance level of 25 ppm Bellacide 325 by continuous addition it will be necessary to have an appropriate dosing pump and know the volume, half-life (makeup/blowdown rate), evaporative rate, and windage loss of the system.

Maintenance Treatment - Concentrations below the recommended level of 25 ppm Bellacide 325 may give adequate control, depending upon the strains of algae present. Experience will demonstrate the level of Bellacide 325 required.

(II) **Slug/Intermittent addition:**

Initial Treatment - Apply sufficient Bellacide 325 to maintain up to 25 ppm Bellacide 325 in the water together with chlorination and/or bromination as described under the continuous addition section. Dosing concentration and frequency will be dependent upon a system's volume and half-life (makeup/blowdown rate). For example, to maintain 25 ppm Bellacide 325 in a system with a volume of 10,000 gallons and a half-life of 3 days, an initial dose of 50 ppm Bellacide 325 would be required (about 60 fluid ounces in 10,000 gallons), followed by additions of 25 ppm Bellacide 325 (about 30 fluid ounces in 10,000 gallons) every 3 days.

Maintenance Treatment - Concentrations below the recommended level of 25 ppm Bellacide 325 may give adequate control, depending upon the strains of algae present. Experience will demonstrate the level of Bellacide 325 required.

It is recommended that Bellacide 325 be dosed at the same time as the chlorine and/or bromine is dosed and as close as possible to the chlorine and/or bromine dosing point.

Non-Chlorinated and/or Non-Brominated Systems

(I) **Continuous addition:**

Initial Treatment - To keep systems free of algae, maintain up to 9 fluid ounces per 1000 gallons of water, or about 75 ppm, of Bellacide 325 in the system water (which is equivalent to about 3 ppm active ingredient). In order to achieve a maintenance level of 75 ppm Bellacide 325 by continuous addition it will be necessary to have an appropriate dosing pump and know the volume, half-life (makeup/blowdown rate), evaporative rate, and windage loss of the system.

Maintenance Treatment - Concentrations below the recommended level of 75 ppm Bellacide 325 may give adequate control, depending upon the strains of algae present. Experience will demonstrate the level of Bellacide 325 required.

(II) **Slug/Intermittent addition:**

Initial Treatment - Apply sufficient Bellacide 325 to maintain up to 75 ppm Bellacide 325 in the water. Dosing concentration and frequency will be dependent upon a system's volume and half-life (makeup/blowdown rate). For Example, to maintain 75 ppm Bellacide 325 in a system with a volume of 10,000 gallons and a half-life of 3 days, an initial dose of 150 ppm Bellacide 325 would be required (about 180 fluid ounces in 10,000 gallons), followed by additions of 75 ppm Bellacide 325 (about 90 fluid ounces in 10,000 gallons) every 3 days.

Maintenance Treatment - Concentrations below the recommended level of 75 ppm Bellacide 325 may give adequate control, depending upon the strains of algae present. Experience will demonstrate the level of Bellacide 325 required.

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{Below are two optional warranty statements, short and long versions, which may be used on label interchangeably}

[NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.]

{or}

[Conditions of Sale and Warranty

The directions for use of this product reflect the opinion of experts, based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness, or other unintended consequences, may result because of such factors as the presence of other materials or the manner of use, all of which are beyond the control of BWA Water Additives US LLC or the seller. All such risks shall be assumed by the buyer. BWA Water Additives US LLC makes no warranty whether expressed or implied, including warranties of merchantability or of fitness for a particular purpose for this product. Under no circumstances shall BWA Water Additives US LLC be liable for incidental, consequential or other damages from alleged negligence, breach of warranty, strict liability or any other theory, arising out of the use or handling of this product. The sole liability of BWA Water Additives US LLC for any claims arising out of the manufacture, use or sale of its products shall be for the buyer's purchase price.]

{Left Panel}

Precautionary Statements Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling. Follow personal protective equipment manufacturer's instruction for cleaning/maintaining personal protective equipment. If no such instructions for washables exists, use detergent and hot water. Store and wash personal protective equipment separately from other laundry. Users should wash before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticides gets inside. Then wash thoroughly and put on clean clothes. Users should remove personal protective equipment immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

FIRST AID:

IF SWALLOWED:

- 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.

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 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 treatment advice.

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 eye.
- Call a poison control center or doctor for treatment advice.

Have the label or MSDS with you when calling a poison control center or doctor, or going for treatment. [IN CASE OF MEDICAL EMERGENCY, CALL [1-303-623-5716] [1-877-800-5553] [IN CASE OF TRANSPORT EMERGENCY, CALL] [800-424-9300][telephone number supplied by supplemental registrant].]

ENVIRONMENTAL HAZARDS

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.

Precaution: Do not use Bellacide 325 in recirculating cooling water systems or decorative and ornamental fountains where the treated water will come into contact with lawns, trees, shrubs, or other desirable plants, since injury may result. Water from treated systems may not be used for irrigation or spraying of agricultural crops, lawns, or ornamental plants, or for watering cattle, goats, hogs, horses, poultry, or sheep, or for human consumption.

Storage and Disposal

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

Storage: Protect from freezing.

Pesticide Disposal: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Changed per PR Notice
2007-4

CONTAINER DISPOSAL:

{Text for non-refillable containers}

Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying.

{For containers with less than or equal to 5 gallon capacity}

[Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ 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.]

{For containers with greater than 5 gallon capacity}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ 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.]

{Text for refillable 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.]

