

OCT - 4 2007

Ms. Rose Beattie
Product Registration Specialist
BWA Water Additives US LLC
1979 Lakeside Parkway, Suite 925
Tucker, GA 3008

Subject: **Bellacide 350**
EPA Registration Number 83451-15
Application Dated May 22, 2007
EPA Received Date May 15, 2007

Dear: Ms. Beattie:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable on the conditions you make the following change list below:

Proposed Amendments:

Adding additional usage (enhanced oil recovery systems)

Label Comment:

Revise statement "Not For Marine Use" to read "Not for use in estuarine or marine oil recovery systems."

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

General Comments:

A stamped copy of the acceptable labeling with comments is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland on (703) 308-6224 and Velma Nobel on (70) 308-6233.

Sincerely,



Velma Nobel
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

Enclosure: Label, Reviews Occupational Exposure Assessment for TTPC dated 9/10/07, Ecological Hazard Assessment of New Use dated 9/17/07 and Update Toxicology end points

{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.}

BELLACIDE 350

For use as an algicide, bactericide, fungicide, for the control algae, slime forming bacteria, sulfate reducing bacteria, and fungi in air-washers and industrial air scrubbing systems, recirculating cooling water and process water systems including cooling towers, evaporative coolers, brewery pasteurizers, can warmers, and hydrostatic sterilizers and retorts, non-food contact paper and paperboard process water (e.g.: brown paper, corrugated sheet, Kraft paper, newsprint, etc.), enhanced oil recovery systems, oil and gas production and transmission pipelines and systems, gas storage wells and systems, hydrotesting of pipelines and tanks, pipeline pigging and scrapping operations and oil and gas well drilling and maintenance fluids. FOR INDUSTRIAL APPLICATION using closed metered delivery systems only. Open pouring is prohibited. Wear coveralls worn over long-sleeved shirt and long pants, sock, chemical resistant footwear, chemical resistant gloves, protective eyewear and a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHNA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

ACTIVE INGREDIENT:

Tributyl Tetradecyl Phosphonium Chloride

50.0%

OTHER INGREDIENTS:

50.0%

TOTAL:

100.0%

ACCEPTED
with COMMENTS
in EPA Letter Dated:

KEEP OUT OF REACH OF CHILDREN

POISON, DANGER

OCT - 4 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 83451-15



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 eye.
- 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 treatment advice.

IF INHALED:

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

- 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.

Have the product container or label 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] [telephone number supplied by supplemental registrant].]

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER. CORROSIVE. Fatal if absorbed through skin or inhaled. Do not breathe vapor. Causes irreversible eye damage and skin burns. Do not get in eyes or on clothing. Wear coveralls worn over long-sleeved shirt and long pants, sock, chemical-resistant footwear, chemical resistant gloves, protective eyewear and a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHNA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

PHYSICAL OR CHEMICAL HAZARDS: Do not mix with other chemicals. Mix only with water.

ENVIRONMENTAL HAZARDS: 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.

DIRECTIONS FOR USE:

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

This product must be loaded and transferred only using a metering-pump system or a close loading/application system. Open pouring is prohibited. Wear coveralls worn over long-sleeved shirt and long pants, sock, chemical-resistant footwear, chemical resistant gloves, protective eyewear and a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHNA/NIOSH approval number prefix TC-

23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

RECIRCULATING COOLING AND PROCESS WATER SYSTEMS / AIR WASHERS AND INDUSTRIAL AIR SCRUBBING SYSTEMS:

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in commercial and industrial cooling towers, evaporative condensers, heat exchange water systems, evaporative coolers, dairy sweetwater systems, industrial process water systems, brewery pasteurizers, can warmers, hydrostatic sterilizers and retorts, air washing systems equipped with a mist eliminator, and industrial air scrubbing systems. Add Bellacide 350 at a point of uniform mixing such as the basin area.

DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add 2.6 to 7.7 fluid ounces of Bellacide 350 per 1000 gallons (20 to 60 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 1.3 to 3.8 fluid ounces of Bellacide 350 per 1000 gallons (10 to 30 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.

PULP, PAPER, AND PAPERBOARD MILLS:

THIS PRODUCT IS ONLY FOR USE IN NON-FOOD APPLICATION, such as Brown Paper Mills, Sheet for Corrugated Board, Kraft Paper, Newsprint and similar paper / paperboard not intended for food contact uses. When used as directed this product effectively controls bacterial and fungal slimes in pulp, paper, and paperboard mill process water systems including white water systems. Treat water at critical areas in the system where mixing of the product will be uniform such as beaters, furnish chest, white-water tank, save-all, and broke chest. The frequency and duration of the treatment will depend upon the severity of the problem.

DOSAGE RATES.

Initial Dose: When the system is noticeably fouled, add 0.5 to 3.0 pounds of Bellacide 350 per ton of pulp or paper (dry basis) as a slug dose. Repeat until control is achieved. Heavily fouled systems must be cleaned before initial treatment.

Subsequent Dose: When biological control is evident, add 0.3 to 2.0 pounds of Bellacide 350 per ton of pulp or paper (dry basis) as a slug dose as necessary to maintain control.

ENHANCED OIL RECOVERY SYSTEMS:

NOT FOR MARINE USE. When used as directed this product effectively controls slime-forming and sulfate-reducing bacteria in injection and produced water systems, water disposal systems, and other oilfield water systems. Treat water at critical points in the system such as water or oil storage tanks, surge tanks, oil-water separators, before or after injection pumps, and injection well headers.

DOSAGE RATES FOR ENHANCED OIL RECOVERY SYSTEMS.

When the system is noticeably fouled, or to maintain control in the system, add 4.2 to 42 gallons of Bellacide 350 per 1000 barrels of water as a slug dose for 1-8 hours per day, 1-4 times per week.

OIL AND GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS

Bellacide 350 should be added at a point in the pipeline where uniform mixing will occur. The application should be conducted to ensure maximum distribution of Bellacide 350 through the entire internal surface of the pipeline. Follow dosing instructions for enhanced oil recovery systems.

GAS STORAGE WELLS AND SYSTEMS

Individual injection wells should be treated with a sufficient quantity of Bellacide 350 to produce a concentration of 100-1000 ppm Bellacide 350 when diluted by the water present in the formation. Injections should be repeated as needed to maintain control.

Individual drips should be treated with a sufficient quantity of Bellacide 350 to produce a concentration of 100-1000 ppm Bellacide 350 when diluted by the water present in the drips. Injections should be repeated as needed to maintain control.

HYDROTESTING

Water used to hydrotest pipelines or vessels should contain 100-1000 ppm Bellacide 350, depending on water quality and length of time the equipment will remain idle.

PIPELINE PIGGING AND SCRAPPING OPERATIONS

Add Bellacide 350 to a slug of water immediately following the scraper (ideally this water volume can be kept to a minimum and contained between the scraper and a trailing pig). Sufficient Bellacide 350 should be added to produce a concentration of 100-1000 ppm Bellacide 350 in the water at the discharge point or pig trap depending on the length of the pipeline and the severity of biofouling.

DRILLING, PACKER, COMPLETION, WORKOVER AND FRACTURING FLUIDS

Bellacide 350 should be added to these fluids at a point where uniform mixing will occur. Add 100-1000 ppm of Bellacide 350 to a freshly prepared fluid depending on the severity of contamination.

STORAGE AND DISPOSAL:

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

PESTICIDE STORAGE: Keep product dry and store in a cool dry well-ventilated area away from heat or open flame. Store in original container.

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: Triple rinse (or equivalent). 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.

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

Manufactured for:
BWA WATER ADDITIVES US LLC
1979 LAKESIDE PARKWAY, SUITE 925
TUCKER, GEORGIA 30084

EPA REG. # 83451-15
EPA EST. # 68387-CAN-1

Product of Canada

NET WEIGHT: ## lbs (##kg)