

83451-6

9/27/2011  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

18

SEP 27 2011

Ross Beattie  
BWA Water Additives US LLC  
1979 lakeside parkway, Suite 925  
Tucker, GA 30084

Subject: Bellacide 355  
EPA Registration Number 83451-16  
Letter Dated: July 12, 2011  
EPA Received Data: July 15, 2011

Dear Beattie:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable with comments.

**Proposed Labeling:**

- To add additional use instruction for Use Site Group

**Labeling:**

PRN 2005-1 Guidance for Mandatory and Advisory Labeling Statements, states that:

**Mandatory statements**, which commonly use imperative verbs such as "must" or "shall", either require action or prohibit the user from taking certain action.

Advisory statements generally provide information, either in support of the mandatory statements or about the product in general. **To ensure that the intent of each labeling statement is clear, mandatory statement need to be clearly distinguishable from advisory statements.**

Therefore, you must change the word "shall" to "must" where ever it appears

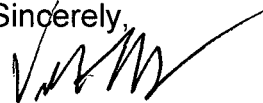
SYMBOL	on the label of pages 4 and 5.						
SURNAME							
DATE							

**General Comments:**

A stamped copy of the acceptable labeling 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 at (703) 308-6224.

Sincerely,



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

Enclosure: Label

{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 355

For use as an algicide, bactericide, fungicide, for the control of 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 scraping operations and oil and gas well drilling and maintenance fluids. FOR INDUSTRIAL APPLICATION. This product must be loaded and transferred only using a metering-pump system. Open pouring is prohibited.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
SEP 27 2011

### ACTIVE INGREDIENT:

Tributyl tetradecyl phosphonium chloride

5.0%

### OTHER INGREDIENTS:

95.0%

### TOTAL:

100.0%

CCCC  
CCCC  
CCCC  
CCCC

CCCC  
CCCC  
CCCC  
CCCC  
CCCC  
CCCC  
CCCC  
CCCC

CCCC

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 83451-16

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 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][IN CASE OF TRANSPORT EMERGENCY, CALL [1-800-424-9300 (CHEMTREC)] [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.** Causes irreversible eye damage and skin burns. Harmful if swallowed or absorbed through skin. May be irritating to nose and throat. Do not get in eyes, on skin or on clothing. Wear coveralls worn over long-sleeved shirt and long pants, socks, chemical-resistant footwear, chemical resistant gloves and protective eyewear. 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. Open pumping is prohibited.

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, socks, chemical-resistant footwear, chemical resistant gloves and protective eyewear.

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

### DOSAGE RATES FOR ABOVE APPLICATIONS.

**Initial Dose:** When the system is noticeably fouled, add 26 to 77 fluid ounces of this product per 1000 gallons (200 to 600 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

**Subsequent Dose:** When microbial control is evident, add 13 to 38 fluid ounces of this product per 1000 gallons (100 to 300 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.

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 this product at a point of uniform mixing such as the basin area.

[DAIRY SWEETWATER SYSTEM APPLICATIONS ARE NOT REGISTERED FOR USE IN CALIFORNIA.]

[BREWERY PASTEURIZERS, CAN WARMERS, HYDROSTATIC STERILIZERS OR RETORTS ARE NOT REGISTERED FOR USE IN CALIFORNIA]

[AIR-WASHER OR AIR SCRUBBER SYSTEM APPLICATIONS ARE NOT REGISTERED FOR USE IN CALIFORNIA]

#### **PULP, PAPER, AND PAPERBOARD MILLS:**

##### **DOSAGE RATES.**

Initial Dose: When the system is noticeably fouled, add 5 to 30 pounds of this product 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 3 to 20 pounds of product per ton of pulp or paper (dry basis) as a slug dose as necessary to maintain control.

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.

[PULP, PAPER, AND PAPERBOARD MILLS APPLICATIONS ARE NOT REGISTERED FOR USE IN CALIFORNIA.]

#### **ENHANCED OIL RECOVERY SYSTEMS:**

##### **DOSAGE RATES FOR ENHANCED OIL RECOVERY SYSTEMS.**

When the system is noticeably fouled, or to maintain control in the system, add 42 to 420 gallons of product per 1000 barrels of water as a slug dose for 1-8 hours per day, 1-4 times per week.

NOT FOR USE IN ESTUARINE OR MARINE OIL RECOVERY SYSTEMS. 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.

## X OIL AND GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS

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

## GAS STORAGE WELLS AND SYSTEMS

*must*  
Individual injection wells should be treated with a sufficient quantity of product to produce a concentration of 1000-10000 ppm of product when diluted by the water present in the formation. Injections should be repeated as needed to maintain control

*must*  
Individual drips should be treated with a sufficient quantity of product to produce a concentration of 1000-10000 ppm of product 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 could contain 1000-10000 ppm of product, depending on water quality and length of time the equipment will remain idle.

## PIPELINE PIGGING AND SCRAPING OPERATIONS

Add the product 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 product should be added to produce a concentration of 1000-10000 ppm of product 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

The product should be added to these fluids at a point where uniform mixing will occur. Add 1000-10000 ppm of product to a freshly prepared fluid depending on the severity of the contamination.

[ENHANCED OIL RECOVERY SYSTEMS ARE NOT REGISTERED FOR USE IN CALIFORNIA.]

## FIRE PROTECTION SYSTEMS

This product is effective at controlling microbial growth in waters and on pipe surfaces in fire protection systems.

This product <sup>must</sup> be added to a fire protection system using a chemical metering pump capable of variable pump rates. The product <sup>must</sup> be injected at a point, such as a riser, manifold or makeup feed water line, where uniform mixing and distribution will occur. Add 100-600 ppm of product (5-30 ppm active ingredient) depending on severity of microbial contamination in the system. Repeat as needed.

[FIRE PROTECTION SYSTEMS ARE NOT REGISTERED FOR USE IN CALIFORNIA.]

## 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.

*{Text for non-refillable containers}*

**CONTAINER DISPOSAL:** 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 of 5 gallons or less}* 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 ¼ 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 capacities of greater than 5 gallons }* Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ 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.]

NET WEIGHT: ## lbs (##kg)