

83451-20

7/29/2010

1/10



U.S. ENVIRONMENTAL PROTECTION AGENCY
 Office of Pesticide Programs
 Antimicrobials Division (7510P)
 1200 Pennsylvania Avenue NW
 Washington, D.C. 20460

EPA Reg. Number: **83451-20**
 Date of Issuance: **JUL 29 2010**

Term of Issuance:
Unconditional

Name of Pesticide Product:
Bellacide 303

NOTICE OF PESTICIDE:
 Registration
 Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):
BWA Water Additives US LLC
1979 Lakeside Parkway, Suite 925
Tucker, GA 30084

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.

2. Make the labeling changes listed below before you release the product for shipment:

a. Revise the "EPA Registration Symbol to read, "EPA Reg. No. 83451-20".

Signature of Approving Official:

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

Date:
JUL 29 2010

Acute Tox Comments:

- 3. CTT denies the request to change the toxicity category of the acute inhalation toxicity study (MRID Number 479120-03). It is the obligation you to demonstrate the toxicity categories of their products. Your statement concerning the (acute inhalation toxicity) LC₅₀ of 83451-EN is only partially correct. It does appear that the LC₅₀ for females is slightly less than 0.11 mg/L. However, **the LC₅₀ for the male test subjects appears to be appreciably less than 0.11 mg/L.** It does appear that the acute inhalation LC₅₀ for males tested with Bellacide 303 falls into toxicity category I.

In addition, the dosages were chosen in such a manner that the LC₅₀ for male test subjects cannot be interpolated (bracketed). It would have been much more practical to dose at 2 mg/L, 0.5 mg/L and 0.05 mg/L, the separation points for toxicity categories. Please see Figure 1. The mortality rate for males has not yet reached the LC₅₀.

You believe that this product should be assigned toxicity category II instead of category I, you do have the recourse of having a second, complete, acute inhalation toxicity study conducted. CTT would review such a report and apply the findings to the toxicity category and precautionary labeling of this product.

- 4. CTT grants the waiver of the primary eye and skin irritation studies. The acute dermal toxicity study reported severe eschar and necrosis as clinical findings. CTT bases the waivers on this reported irritation and assigns toxicity category I for both primary eye and skin irritation. CTT does not wish to encourage over-labeling. If you feel that toxicity category I for eye and skin irritation is inappropriate for this product, you may submit actual primary eye and skin irritation studies conducted using 83451-EN.

The acute toxicity profile for File Symbol 83451-EN is currently:

Current Acute Toxicity Profile for 83451-EN			
Study	MRID Number	Toxicity Category	Study Status
Acute Oral Toxicity	479120-01	III	Acceptable
Acute Dermal Toxicity	479120-02	III	Acceptable
Acute Inhalation Toxicity	479120-03	I	Acceptable
Primary Eye Irritation	None	I	Waived
Primary Skin Irritation	None	I	Waived
Dermal Sensitization	479120-04	Sensitizer	Acceptable

LABELING:

- 1. The Signal Word is "DANGER", based upon the results of the acute inhalation toxicity, and, the toxicity category assignments of the primary eye and skin irritation studies. Based upon the manner in which those three studies are classified, the registrant may choose to have the three studies conducted (reconducted for the acute inhalation toxicity study). This could lead changes of the three toxicity categories, and, potentially changes in the Signal Word of this product.
- 2. This product's label must state the word "Poison" and display the skull and crossbones symbol, ☠. This labeling requirement is based upon the toxicity category I classification of the acute inhalation toxicity study.

3. The Precautionary Statements must state:

“Corrosive. Fatal if inhaled. Causes irreversible eye damage and skin burns. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wear goggles, face shield, or safety glasses. Wear coveralls worn over long-sleeved shirt and long pants and socks. Wear chemical-resistant footwear, and chemical-resistant gloves. Wear a respirator with an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSAH/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.”

4. The First Aid statements must state:

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 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 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 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.

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

“Have product container or label with you when calling a Poison Control Center or doctor for treatment advice.”

5. The product label shall include the following from Chapter 10 of the EPA's Label Review Manual:

“Follow the manufacturer's instructions for cleaning/ maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.”

6. This product meets the Agency requirements for Restricted-Use Classification based on information that places it in toxicity category I for acute inhalation toxicity, primary eye irritation, and primary skin irritation. In lieu of assigning the product Restricted-Use classification, the product manager may consider

alternatives such as face shield or goggles (to mitigate the identified hazards). Please refer to the 40 CFR §152.170 for information on Restricted-Use products. As the registrant markets this product for use in closed systems, PM Team 31 may want to consult one of AD's industrial hygienists or exposure experts to determine whether Restricted-Use classification is necessary for this product.

5/10

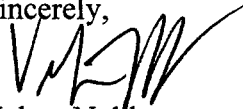
7. Based upon data placing based on information that places it in toxicity category I for acute inhalation toxicity, primary eye irritation, and primary skin irritation this product meets the Agency requirements for Child-Resistant Packaging (CRP). However, the Agency does not require products that are assigned Restricted-Use status to be placed in CRP in *addition to* Restricted-Use Classification. Please refer to the 40 CFR, §157.22 and 157.24 for CRP requirements and exemptions. Thus, CTT recommends that this product be assigned Restricted-Use classification; if not, this product should at least be packaged in CRP.

Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Should you have any questions regarding this letter, please contact Drusilla Copeland at (703) 308-6224 or Velma Noble at (703) 308-6233.

Sincerely,



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

Enclosure: Stamped Label, approved tox review dated 4/30/2010

{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 303

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.), and 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 using closed metered delivery systems only. Open pouring is prohibited. Wear coveralls worn over long-sleeved shirt and long pants, socks, chemical resistant footwear, chemical resistant gloves, and protective eyewear (goggles or face mask).

ACTIVE INGREDIENT:		
Tributyl Tetradecyl Phosphonium Chloride		15.0%
Poly[oxyethylene(dimethyliminio)ethylene (dimethyliminio)ethylene dichloride]		12.0%
OTHER INGREDIENTS:		<u>73.0%</u>
TOTAL:		<u>100.0%</u>

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 29 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, this pesticide,
registered under EPA Reg. No.

83451-20

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 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. May be fatal if inhaled. Do not breathe vapor.

Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wear coveralls worn over long-sleeved shirt and long pants, socks, chemical-resistant footwear, chemical resistant gloves, and protective eyewear (goggles or face mask). Remove and wash contaminated clothing before reuse. 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, socks, chemical-resistant footwear, chemical resistant gloves, and protective eyewear (goggles or face mask). Be sure to release any pressure in the container prior to fully opening. This can be done by loosening the closure prior to fully opening the container. **DO NOT OPEN WITH FACE CLOSE TO THE CONTAINER OPENING.**

[RECIRCULATING COOLING AND PROCESS WATER SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in commercial and industrial cooling towers, evaporative condensers, evaporative coolers, closed loop heating and cooling systems and industrial process water systems. Add this product 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 6.4 to 19.2 fluid ounces of product per 1000 gallons (50 to 150 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 1.9 to 9.6 fluid ounces of product per 1000 gallons (15 to 75 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.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[AIR WASHERS AND INDUSTRIAL AIR SCRUBBING SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in air washing systems equipped with a mist eliminator and industrial air scrubbing systems. Add this product at a point of uniform mixing.

DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add 6.4 to 19.2 fluid ounces of product per 1000 gallons (50 to 150 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 1.9 to 9.6 fluid ounces of product per 1000 gallons (15 to 75 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.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[HEAT TRANSFER SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in brewery pasteurizers, bottle and can warmers and hydrostatic sterilizers and retorts. Add this product at a point of uniform mixing.

DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add 6.4 to 19.2 fluid ounces of product per 1000 gallons (50 to 150 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 1.9 to 9.6 fluid ounces of product per 1000 gallons (15 to 75 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.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[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 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 0.3 to 2.0 pounds of product per ton of pulp or paper (dry basis) as a slug dose as necessary to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[ENHANCED OIL RECOVERY SYSTEMS:

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.

DOSAGE RATES FOR ENHANCED OIL RECOVERY SYSTEMS.

When the system is noticeably fouled, or to maintain control in the system, add 4.2 to 63 gallons of this product per 1000 barrels of water as a slug dose for 1-8 hours per day, 1-4 times per week.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[OIL AND GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS:

This product should be added at a point in the pipeline where uniform mixing will occur. The application should be conducted to ensure maximum distribution of product 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 product to produce a concentration of 100-1500ppm of this product when diluted by the water present in the formation. Injections should be repeated as needed to maintain control.

Individual drips should be treated with sufficient quantity of this product to produce a concentration of 100-1500 ppm of this product when diluted by the water present in the drips. Injections should be repeated as needed to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[HYDROTESTING:

Water used to hydrotest pipelines or vessels should contain 100-1500 ppm of product, depending on water quality and length of time the equipment will remain idle.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[PIPELINE PIGGING AND SCRAPING OPERATIONS

Add this 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 100-1500 ppm of this product in the water at the discharge point or pig trap depending on the length of the pipeline and the severity of biofouling.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[DRILLING, PACKER, COMPLETION, WORKOVER AND FRACTURING FLUIDS:

This product should be added to these fluids at a point where uniform mixing will occur. Add 100-1500 ppm of this product to a freshly prepared fluid depending on the severity of contamination.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

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.]

{Text for refillable containers}

CONTAINER DISPOSAL: Refillable container. Refill this container with Tributyl tetradecyl phosphonium chloride 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.

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-XX
EPA EST. # 1448-TN-01

NET WEIGHT: ## lbs (##kg)