

83451-20

09/17/2012

17

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 17 2012

Mr Ross Beattie
Product Registration Specialist
BWA Water Additives US LLC
1979 Lakeside parkway, Suite 925
Tucker, GA, 30084

Subject **Bellacide 303**
EPA Registration Number 83451-20
Stamped accepted label dated May 2, 2012

Dear Mr Beattie

This correspondence is intended to correct the Agency's comments associated with the stamped accepted label as referenced above. The Agency letter of May 2, 2012 is now corrected by disregarding comment 1 with the removal of the restricted use and child resistant packaging requirements. A stamped label is enclosed for your records.

Please make this correction to the label for this product. Should you have any questions concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

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 stamped label

CONCURRENCES

SYMBOL								

SURNAME
DATE

{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 }

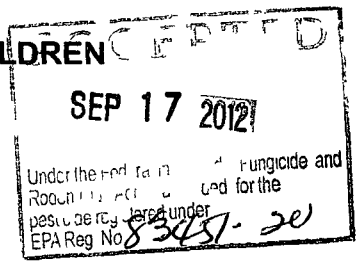
BELLACIDE 303

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

ACTIVE INGREDIENT	
Tributyl Tetradecyl Phosphonium Chloride	15 0%
Poly[oxyethylene(dimethyliminio)ethylene (dimethyliminio)ethylene dichloride]	12 0%
OTHER INGREDIENTS	73 0%
TOTAL	100 0%

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

- 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

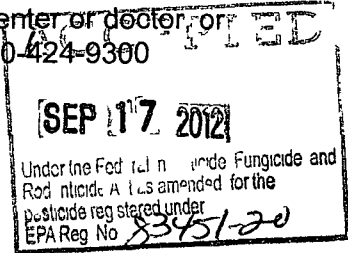
- Move person to fresh air
- If person is not breathing call 911 or an ambulance and then give artificial respiration, preferably mouth-to-mouth if possible
- Call a poison control center or doctor for treatment advice

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

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

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]



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER Corrosive Causes skin burns Causes irreversible eye damage May be fatal if inhaled Harmful if absorbed through skin Harmful if swallowed Do not breathe spray/mist Do not get in eyes, on skin or on clothing Wear protective eyewear (goggles, face shield, or safety glasses) Wear coveralls worn over long-sleeved shirt and long pants and socks, chemical-resistant footwear, and gloves Remove and wash contaminated clothing before reuse Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco Prolonged or frequent repeated skin contact may cause allergic reaction in some individuals

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

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]

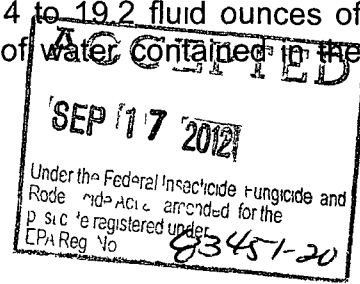
[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[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]]

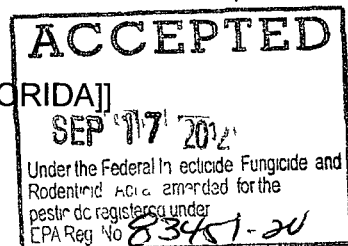
[ENHANCED OIL RECOVERY SYSTEMS

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 must be added at a point in the pipeline where uniform mixing will occur Conduct the application 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 must 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 Repeat injections as needed to maintain control

Individual drips must 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 Repeat injections as needed to maintain control]

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

[HYDROTESTING

Water used to hydrotest pipelines or vessels must 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) Add sufficient product 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]]

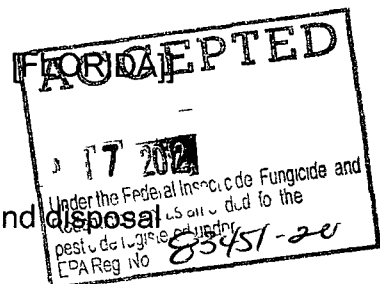
[DRILLING, PACKER, COMPLETION, WORKOVER AND FRACTURING FLUIDS

This product must 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. If not, puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. 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 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 capacities of greater than 5 gallons} [Triple rinse as follows. Empty the remaining contents into application equipment or a mix tank. Fill the container 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}

CONTAINER DISPOSAL 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.

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 # 83451-20
EPA EST # 1448-TN-01

NET WEIGHT ## lbs (##kg)

