



## PPG Industries

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**Paul Malichky, Manager**  
Regulatory & Emerging Issues

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Via E-Mail to "[opp\\_labeling\\_consistency@epa.gov](mailto:opp_labeling_consistency@epa.gov)"

Office of Pesticide Programs Labeling Committee  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Re: Proposed Revisions to Chemigation Labeling Language

Dear Sir or Madam:

This letter responds to the U.S. Environmental Protection Agency's (EPA) December 5, 2008, announcement and request for public comment on proposed revisions to EPA's current guidance, contained in Pesticide Registration (PR) Notice 87-1,<sup>1</sup> for labeling language for pesticide products applied through irrigation systems or "chemigation." The announcement is available at <http://www.epa.gov/pesticides/regulating/labels/chemigation.pdf>. According to the January 30, 2009, EPA Pesticide Program Updates e-mail, the comment deadline for this proposal is extended until March 6, 2009.

As discussed below, if EPA elects to extend its labeling guidance for chemigation to antimicrobial and antifoulant products, PPG Industries, Inc. (PPG) requests that EPA exempt chlorine chemistry antimicrobial products similar to PPG's product from any chemigation-specific labeling language requirements that may apply to other antimicrobial or antifoulant products.

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<sup>1</sup> EPA, *Pesticide Registration Notice 87-1: Label Improvement Program for Pesticides Applied through Irrigation Systems (Chemigation)* (Mar. 11, 1987), available at [http://www.epa.gov/PR\\_Notices/pr87-1.html](http://www.epa.gov/PR_Notices/pr87-1.html).

PPG manufactures calcium hypochlorite tablets, dry chlorinating tablets that are registered for use for industrial and potable water treatment applications, including drip/trickle sprinkler irrigation systems. The calcium hypochlorite active ingredient provides a steady source of available chlorine. The product may be used in drip/trickle irrigation systems to control the build-up of bacteria, algae, and slime, as well as periodically at higher concentrations to eliminate build-up or clogs due to bio-fouling. When used on a continuous basis to control bio-fouling, the recommended chlorine concentration in the irrigation water is comparable to the concentration of chlorine in drinking water (1 to 2 parts per million (ppm)).<sup>2</sup> Periodic single treatments up to 20 ppm are approved to eliminate build-up. To reclaim a clogged low-volume irrigation system, a single treatment at a total available chlorine concentration up to 100 ppm is approved.

In the announcement, EPA states that current chemigation guidance does not address use of antimicrobial or antifoulant chemicals in chemigation delivery systems. EPA further states that algicides and other antifoulant pesticides must state whether or not they are intended or appropriate for use in chemigation systems. EPA invites comment on whether additional language should be required that is specific to the use of algicides or antifoulant pesticides used to clean and maintain chemigation equipment.

If a pesticide product used in a chemigation system contains a Toxicity Category I active ingredient, the current PR Notice 87-1 requires that the areas treated by chemigation must be posted with EPA-prescribed language. As the PPG calcium hypochlorite product registered for this use pattern is classified in Toxicity Category I (Signal Word DANGER), it would appear that any decision by EPA to apply the provisions of the PR notice to all antimicrobial or antifoulant products used in chemigation systems would impose significant posting requirements on growers who use PPG's

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<sup>2</sup> The Maximum Residual Disinfectant Level for chlorine is 4 mg/L or ppm. 40 C.F.R. § 141.54.

product to maintain their chemigation equipment, as well as the other requirements specified by the chemigation guidance.

Although the undiluted PPG calcium hypochlorite product is potentially hazardous, the extremely high rate of dilution when used in accordance with the approved labeling assures that the treated water will not present any exposure hazard for bystanders. The application rate of PPG's product in chemigation systems usually results in a chlorine level that is essentially the level found in drinking water, which EPA has found safe for human consumption. The product is applied at higher concentrations on only a short-term basis to eliminate clogs; the chlorine is consumed during application and residual levels are diluted with fresh water when the system is flushed. PPG does not believe it would be appropriate or reasonable for EPA to extend the requirements in the chemigation guidance to PPG's and related products. Accordingly, if EPA elects to extend its labeling guidance for chemigation to antimicrobial and antifoulant products, PPG requests that EPA exempt chlorine chemistry antimicrobial products similar to PPG's product from any chemigation-specific labeling language requirements that may apply to other antimicrobial or antifoulant products.

PPG appreciates this opportunity to participate in this early stage of EPA's guidance revision process. If there are any questions concerning these comments, please call me at (412) 492-5706.

Sincerely,

A handwritten signature in cursive script that reads "Paul Malichky". The signature is written in dark ink and is positioned above the printed name.

Paul Malichky