



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

2/23/2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Product Chemistry Review of : **BCMW**

DP Barcode: **D313221**
Manufacturing-use [**X**]

Reg. No. or File Symbol: **1448-UGE**
End-use Product []

SUBJECT: Product Chemistry Review of : **Busan 1215**

DP Barcode: **D313226**
Manufacturing-use []

Reg. No. or File Symbol: **1448-UGG**
End-use Product [**X**]

Active Ingredient Composition (**for both products**):

Ammonia (total).....7.59%

TO: Velma Noble PM 31

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AT 2/23/05

THRU: Karen P. Hicks, CT Team Leader
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THRU: Michele E. Wingfield, Chief
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BACKGROUND:

This new product registration, covering both a proposed manufacturing-use (MUP) and end-use (EP) microbicide for water systems was submitted by the registrant, Buckman Laboratories International, Inc. The product is primarily used in the manufacture of paper and paperboard.

The registrant, in this application, has requested approval to concurrently register **BCMw** a manufacturing-use product (MUP) and **Busan 1215** an end-use-product (EP). Both of the proposed new products are based on the use of the active ingredient ammonia at a 7.59% nominal concentration. The Basic CSF for each of the two products is identical. Separate labels were, however, required to accommodate the MUP and EP directions for use. The product chemistry data provided applies to both of the antimicrobial (algal, fungal, bacterial control) products.

The following documents were submitted and examined in the chemistry review of this submission: registrant's cover letter and transmittal document dated December 21, 2004, proposed Basic CSF for **BCMw** and **Busan 1215** both dated December 21, 2004, Data Matrix for **BCMw** dated 12/20/04 and product labels for **BCMw** and **Busan 1215** both dated 12/21/04. Also examined was Product Chemistry Data for Guideline 830 Group A and B under MRID #464351-02, #464351-04 and #464351-14.

FINDINGS:

1. The requirements of PR Notice 91-2 were satisfied. The nominal concentration of the active ingredient, ammonia, given in the Basic CSF agreed with the percentage declared on the label.
2. The upper and lower certified limits for the active and inert ingredients were acceptable with the exception of the [REDACTED]. Registrant must base all certified limits on the nominal concentration (N) of each ingredient. The (N) value for the [REDACTED] therefore the UCL and LCL should be [REDACTED] and [REDACTED] respectively for [REDACTED].
3. All other ingredients utilized are approved for use in pesticide formulations.
4. The end-use product (EP) **Busan 1215** is a 100% re-pack of the proposed

INERT INGREDIENT INFORMATION IS NOT INCLUDED

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manufacturing-use (MUP) **BCMW**.

5. The Product Chemistry Data submitted was complete and consistent with the chemical and physical characteristics of an aqueous ammonia solution.

6. A 28 day Accelerated Storage Stability Study was completed involving **Busan 1215**. No evidence of active ingredient loss and product package (opaque HDPE) degradation was observed. Registrant should complete a 1-year Storage Stability and Corrosion Characteristic study covering this product.

7. All other elements of this submission and the two Basic CSFs for **BCMW** and **Busan 1215** were acceptable.

RECOMMENDATIONS:

This new product application, in support of concurrently registering **BCMW** and **Busan 1215**, is accepted with comment.

Registrant should address item #2 noted under Findings, at the next convenient time and complete the initiated studies discussed in item #6.

02/23/05 AT