

1448-28

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

FEB 24 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DENNIS L. BARBEE
BUCKMAN LABS INC.
1256 MCLEAN BLVD.
MEMPHIS, TN 38108

Subject: Label Amendment Submission of 9/17/93 In Response to PR Notice 93-7
EPA Reg. No. 1448-28
BUSAN 72A

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



Recycled/Recyclable
Printed with Soy/Canola ink on paper that
contains at least 50% recycled fiber

Each notification must include the following information:

- 1. Registrant's name and address.
- 2. EPA Registration number of the product for which the labeling was submitted.
- 3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

- 1. Quantity of the product that has been sold or distributed.
- 2. EPA Producing Establishment number.
- 3. Location of the product, if known.
- 4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
 Compliance Division, (7203)
 Worker Protection Notification
 Office of Compliance Monitoring
 U.S. Environmental Protection Agency
 401 M Street SW
 Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

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IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling as amended

AND

- WITHIN one year from date of this acceptance.

Submit the final printed labeling via the U.S. Postal Service to:

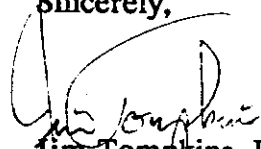
Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

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Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Dennis L Barbee
BUCKMAN LABS INC
1256 MCLEAN BLVD
MEMPHIS TN 38108

Comment for: EPA Reg Nr.1448-28
BUSAN 72A

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Add the following statement to the "Personal Protective Equipment" section of your label: "Discard clothing and other absorbent materials that have been drenched or heavily-contaminated with this product's concentrate. Do not reuse them." The exact location ofr this statement is shown in Section A on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Add the following User Safety Recommendation to the label in the location shown in Section A on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

The bodywear requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Coveralls over long-sleeved shirt and long pants." The exact location is shown in Sections A and B on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

The Agricultural Use Requirements section must be located in a clearly separate box on the product labeling -- with lines or other graphic indicators (such as contrasting color) to separate the section from the surrounding text.

The bodywear requirement for early entry in the Agricultural Use Requirements box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Coveralls over long-sleeved shirt and long pants." The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

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BUCKMAN LABS INC
EPA Reg. Number: 1448-28
BUSAN 72A
Application date: 07/22/93
Original Submission

Correct the typographical errors circled on your proposed label.

BUSAN 72A

BUSAN is a registered trademark.

KEEP OUT OF REACH OF CHILDREN WARNING AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

WARNING: Harmful if swallowed. May be harmful if absorbed through the skin. Workmen handling the product should avoid contact of the product with skin. Personal Protective Equipment: Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category F on an EPA chemical resistance category selection chart. Applicators and other handlers must wear: coveralls over short-sleeved shirt and short pants; chemical resistant gloves, such as barrier laminate or butyl rubber (> 14 mls) or nitril rubber (> 14 mls) or viton (> 14 mls); chemical resistant footwear plus socks; protective eyewear; chemical resistant headwear for overhead exposure; chemical-resistant apron when cleaning equipment, mixing, or loading; dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C). Follow 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.

STATEMENT OF PRACTICAL TREATMENT: If swallowed, call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin, wash promptly and thoroughly with an abrasive soap and cool water and finally with glycerin. In case of persistent irritation of the skin, obtain medical attention. If in eyes, product causes eye damage. Flood eyes immediately and thoroughly with cool water for 15 to 30 minutes. See a physician if any irritation persists.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Keep out of any body of water. Do not contaminate water when disposing of equipment washwaters.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Do not expose to extreme temperatures. Do not stack more than five drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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 your EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forest, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restrictive-entry interval. The requirements in this box only apply to the uses of this product that are covered by the Worker Protection Standard. Do not enter or allow worker entry into the treated areas during the restricted entry interval (REI) of 24 hours. Exception: If the product is soil-injected or soil-incorporated, the worker protection standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water is: coveralls over short-sleeved shirt and short pants; chemical resistant gloves, such as barrier laminate or butyl rubber (> 14 mls) or nitril rubber (> 14 mls) or viton (> 14 mls); chemical resistant footwear plus socks; protective eyewear; chemical resistant headwear for overhead exposure.

Busan 72A is recommended for the control of disease impairing pine and white fir seed germination. Busan 72A, when used as directed, will usually increase the stands of pines and fir seedlings by reducing losses from seed decay and seedling disease caused by many seed and soilborne fungi. Busan 72A is recommended for the control of Fusarium rot of gladiolus corms. Busan 72A is also recommended for the control Fusarium basal rot and Penicillium blue mold on iris, tulip, and narcissus bulbs. Busan 72A is used at time of planting to protect cottonseed and seedlings against seed and seedling rots, damping-off, shreshin (Fythocotonia), Pythium, and other disease impairing good seed germination and seedling development. Busan 72A is also used at time of planting to protect cottonseed and seedling against bacterial blight transmitted on the surface of machine-delinted cottonseed. **PINE:** Seed Protection - Pine (Pinus spp.) seeds can be protected either by treating the seeds or by adding Busan 72A to the soil used to plant pine seeds in plastic bullets. Treat, by slurry and before seed stratification in vermiculite, one bushel of pine seeds with 0.53 fluid ounces of Busan 72A dispersed in 1.33 quarts of water. If plastic bullets are used, seed protection can then be accomplished by treating the surface of the 45 grams of soil in a plastic bullet with 0.034 fluid ounces (one millilitre) of a Busan 72A-water dispersion containing 0.034 fluid ounces of Busan 72A in water to make a total volume of 5.2 gallons. This treatment is equivalent to 3 pounds of active ingredient per acre. **FIR:** Seed Protection - Treat, by slurry and before seed stratification in vermiculite, one bushel of fir (Abies spp.) seeds with 0.53 fluid ounces of Busan 72A dispersed in 1.33 quarts of water. **GLADIOLUS CORMS:** Soak the corms for 15 minutes in a Busan 72A-water dispersion which contains 0.8 pints of Busan 72A in water to make a total volume of 100 gallons. For protection during storage, soak the clean corms as soon as possible after digging. When treating before planting, soak corms close to planting time as possible. **IRIS, TULIP, AND NARCISSUS BULBS:** As soon as possible after digging, soak clean bulbs for 30 minutes in a

ACTIVE INGREDIENT

2-(Thiocyanomethylthio)

INERT INGREDIENTS

Busan 72A-water dispersion that contains 75-85°F. Clean bulbs as much as possible. For machine-delinted seed, respectively, provided recommended amount of product (for acid-delinted seed) or 1.4 fluid ounces of Busan 72A. Suggested use the concentration and amount of slurry slurry treated provided that 3.0 or 3.5 fluid ounces, respectively, is applied. Do not apply to soil for oil purposes. Store away from imparts an unnatural color to the seed.

IMPORTANT LABEL TREATED SEED AND CORMS: seeds treated with Busan 72A cannot be planted except planting.

ACCEPTED
with COMMENT
In EPA Letter I

FEB 24 1988

Under the Federal
Fungicide, and Rodenticide
Act as amended, for the
registered under EPA
1498-2

HMS/NP
Health 2 Flamm
EPA Reg. N
Product Weight 10
NET CONTENT
CONT
Manufactured By E
BUCKMAN LAB
1256 N. McLean
30
(901) 278-0330 or