448-29

4/2/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 0 2 2003

Buckman Laboratories, Inc. 1256 North McLean Blvd Memphis, TN 38108

Attention: Crystal W. Brown Regulatory Affairs Specialist

Subject: TCMTB EPA Registration No. 1448-29 Notification Dated February 24, 2003

This will acknowledge receipt of your notification to include additional label layout comments, submitted under the provisions of FIFRA Section 3(c)9. Based on a review of the submitted material, the following comments apply.

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,

Marshall Swindell Product Manager (33) Regulatory Management Branch 1 Antimicrobial Division (7510C)

CONCURRENCES						
SYMBOL				**************		
SURNAME						

\$epa	Environmenta	United States Environmental Protection Agency Washington, DC 20460			Registrat Amendrr Other		OPP Identifier Number	
		Application 1	ior Pestic	ide - Sectio	n I			
. Company/Product Nu				Product Manager		3, Pro	posed Classification	
Buckman Laborato			Marsr PM#	nall Swindell			None Restrict	
. Company/Product (N Buckman Laborato			33					
Name and Address o	f Applicant (Include ZIP Co	ide)					FIFRA Section 3(c)(3)	
Buckman Laborat 1256 North McLea Memphis, TN 38	an, Blvd.		to:	my product is si Reg. No			mposition and labeling	
Check h	^r this is a new address		Produ	uct Name				
نيسية 			Section -					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.			[Final printed labels in repsonse to Agency letter dated "Me Too" Application. Other - Explain below.				
. Material This Product	Will Be Packaged In:		Section - I	111		· · · · · · · · · · · · · · · · · · ·		
hild-Resistent Peckagi		v	vater Soluble F	Packaging	2. Type of C	ontainer	······································	
Yes	Yes	[Yes			Metal Plastic		
No	No	<u> </u>	No			Glass		
<i>`artification mus</i> _ submitted	f If "Yes" Unit Packaging wgt.		"Yes" ackage wgt	No. per container		Paper Other (St	pecify)	
Location of Net Conte	Container	4. Size(s) Retail C	onteiner	5. 1	ocation of Lebe	Direction	າອ	
. Manner in Which Lab	el is Affixed to Product	Lithograph Paper glue Stenciled	d	Other	·			
			ection - I	v				
Contact Point (Comp	lete items directly below f				cessary, to proc	ess this i	application.)	
ame	······································	Title					No. (Include Area Code	
{ · · · · · · · · · · · · · · · ·			Regulatory Affairs Specialist			901-272-8	258	
•	tatements I have made on It any knowlingily false or ble law,		ttachments th		•	olete.	6. Date Application Received (Stamped)	
	3. Title			e Ilatory Affairs Specialist				
Signature		Reg	ulatory Affairs	Specialist			۶ ۲	

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

BUCKMAN LABORATORIES INTERNATIONAL, INC.

1256 NORTH McLEAN BLVD. MEMPHIS, TN 38108-1241 U.S.A. TELEPHONE (901) 278-0330 FAX (901) 276-5343 www.buckman.com e-mail: knetix@buckman.com

24 February 2003

Mr. Marshall Swindell, PM 33 Regulatory Management Branch I Antimicrobial Division (7510C) U.S. Environmental Protection Agency Room 266A, Crystal Mall #2 1921 Jefferson Davis Highway Arlington, VA 22202

Re: TCMTB, EPA Reg. 1448-29 New Label Format

Dear Mr. Swindell:

The TCMTB (EPA Reg. # 1448-29) product label layout has been revised to include additional label layout comments from the other EPA product managers. The label format has been revised to more closely reflect the requirements of 40 CFR 156.10. Since our current software package does not efficiently handle multiple layouts, we are revising all pesticide product label layouts.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of these products. I understand that it is a violation of 18 USC. § 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Enclosed please find the following information to support this request:

- Completed EPA Form 8570-1
- Five (5) copies of the draft labels for each product.

If you have any questions or require any additional information pertaining to this action, please contact me at (901) 272-8258.

Sincerely,

BUCKMAN LABORATORIES INTERNATIONAL, INC.

Crystal W. Brøwn.

Regulatory Affairs Specialist





ACTIVE INGREDIENT(S)	
2-(Thiocyanomethylthio)benzothiazole	80.0%
NERT INGREDIENTS	20.0%
TOTAL	100.0%

Directions for Use

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

This product is for FORMULATING USE ONLY into EPA registered antimicrobials for the following uses: Leather Preservation, Hides and Skins, Pulp and papermills, Particle board, Sapstain and mold control for wood protection, Cooling towers, Cooling water systems (including Automated cooling water systems), Pigment slurries, coatings, caulks, sealants, wallcovering adhesives, Drilling fluids, Petroleum secondary recovery, Cutting fluids, Crude and refined oils, Fuel, Textiles, and Wastewater treatment systems.

Information on the composition, toxicity, methods of formulation, limitations and restrictions, and effectiveness of the product for pesticide purposes is readily available from Buckman Laboratories, Inc.

Formulators are responsible for obtaining registrations and preparing labeling in compliance with EPA guidelines for formulations based on this product.

KEEP OUT OF REACH OF CHILDREN WARNING

_	FIRST AID
if in Eyes	 Hold eyes 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 further treatment advice.
lf on Skin, Clothes	- Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes. - Call a poison control center for treatment advice.
lf Ingested	 Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water, if able to swalkow. 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.
lf Inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
	HOT LINE NUMBER
	product container or label with you when calling a Poison Control Center or doctor for treatment. You may also contact 901-278-0330 pr 1-800-BUCKMAN for

Precautionary Statements

emergency medical treatment information.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes eye and skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. May be fatal if inhaled. Do not breathe spray mist. Harmful if swallowed or absorbed through the skin. This product may cause allergic skin reactions.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. 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 Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Do not contaminate water, PESTICIDE STORAGE: [drums should be placed i sawdust or sand and dispo use.

PESTICIDE DISPOSAL: pesticide, spray midure, o be disposed of by use ac Environmental Control Ag Regional Office for guidan CONTAINER DISPOSAL reconditioning, or punctum approved by state and loca

Hanufactured by

EPA Est. No. 1 EPA Reg. No. 1 Product Weight 1 HMS / N Health 3 Flamma

1256 North McLear