



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OCT 31 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Crystal W. Brown
Regulatory Affairs Specialist
Buckman Laboratories, Inc.
1256 N. McLean Blvd.
Memphis, TN 38108

Subject: **WSCP**
EPA Registration No. 1448-32
Your Letter Dated September 27, 2002

Dear Ms. Brown:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with comments.

Proposed Amendment:

- Response to PR Notice 2001-1

General Comments

1. Separate the precautionary statement heading from the first aid statements. In addition, the precautionary heading and its statement must be grouped together. Read as follows:

Precautionary Statement
Hazards to Humans and Domestic Animals
Caution

Harmful if swallowed. Avoid breathing vapor. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

2. The child signal word Caution, and the Keep Out of Reach of Children statement must be placed under the ingredient statement.

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3. Under the directions for use statement, i.e., "For Formulation Use Only", must contain a statement telling the users the type of end-use product (EP) product (antimicrobial), follow by a continued statement of the uses (disinfectant, sanitizer, etc.) for which the EP could be registered.

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,



Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure

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KEEP OUT OF REACH OF CHILDREN

CAUTION

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

FIRST AID	
If in Eyes	- Hold eye 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.
If 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.
If Ingested	- 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.
If 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	
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may also contact 901-278-0330 or 1-800-BUCKMAN for emergency medical treatment information.	

CAUTION: Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes, or clothing.

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.

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 31 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No.

1448-32

ACTIVE INGREDIENTS:	
Poly(oxyethylene(dimethylimino)ethylene)	60.0 %
(dimethylimino)ethylene dichloride	
INERT INGREDIENTS:	40.0 %
TOTAL	100.0%

Storage and Disposal

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

PESTICIDE STORAGE: Do not stack more than four 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Manufactured by
Buckman Laboratories, Inc.
1236 North McLean Blvd., Memphis, Tennessee 38108, USA
(901) 278-0330 or 1-800-BUCKMAN

EPA Est. No.	1448-TN-1	
EPA Reg. No.	1448-32	Net contents are marked on the container.
Product Weight	9.6 lbs./gal. 1.15 kg/L	

HMIS / NPCA Ratings			Last Revision	
Health	1	Flammability 1	Reactivity 1	8/27/2002

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Directions for Use

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