



Reg # 1448-46

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

FEB 26 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. 1448-46  
BUSAN 30A

**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.

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.1448-46  
BUSAN 30A

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

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.

Correct the typographical errors circled on your proposed label.

# BUSAN 30A

BUSAN is a registered trademark.

KEEP OUT OF REACH OF CHILDREN  
**DANGER PELIGRO**

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)

**DANGER:** Causes irreversible eye damage. Causes skin irritation. This product may cause allergic skin reactions. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. **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.

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.  
Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

**FIRST AID:** IF IN EYES: flush with plenty of water. Get medical attention. IF ON SKIN: wash with plenty of soap and water. Get medical attention. IF SWALLOWED: drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Do not give anything by mouth to an unconscious person. Get medical attention. **NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate gastric lavage.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish. Do not apply directly to water or wetlands. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with a NPDES Permit. For guidance, contact the regional office of the Environmental Protection Agency.

## STORAGE AND DISPOSAL

**STORAGE:** Do not stack more than five drums high. Drums should be opened in well-ventilated areas. 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.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If the 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, 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 30A is recommended for the control of soil and seedborne fungi that impair the germination and seedling development of cotton, wheat, barley, oats, rice, sorghum, milo, corn, sugar beets, and safflower. Busan 30A, when used as directed, will usually increase stands and yields of these crops by preventing seed decay and seedling diseases. Busan 30A is effective against *Rhizoctonia*, *Pythium*, *Fusarium*, *Helminthosporium*, *Thielaviopsis*, *Tilletia*, *Ustilago*, *Verticillium*, and certain other fungi. Busan 30A may be applied directly to the seed from the drum or as an agitated dispersion in water. The recommended rates on the crops presented below may be dispersed in as much as 16 fl oz of water and applied to 100 lb of seed.

BEST AVAILABLE COPY

# AN 30A

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MESTIC ANIMALS)

skin irritation. This product may  
Do not get in eyes, on skin, or  
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reams, ponds, or public waters  
guidance, contact the regional

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### ACTIVE INGREDIENTS:

2-(Thiocyanomethylthio)benzothiazole ..... 30.0 %

INERT INGREDIENTS: ..... 70.0 %

TOTAL: ..... 100.0 %

Crop	Application Rates Per 100 lbs seed	Fungi and Diseases Controlled
Cotton	Acid-delinted seed	Seed and seedling rots
	4.5 oz	damping-off, soreshin
		(Pythium, Rhizoctonia,
		Fusarium, Thielaviopsis)
	Machine-delinted seed	
	5.6 oz; E. of Hecdy	
	Mounia, Uniy:	
	Acid-delinted seed	
	1.25 oz	
	Machine-delinted seed	
	1.5 oz	
Wheat	1-1.25 oz	Scab, head blight
Barley	1-1.25 oz	(Fusarium, Helminthosporium);
Oats	2 oz	Bunt or stinking smut
Rice	1-1.25 oz	(Tilletia); Loose smut of oats
		(Ustilago avenae); Covered smut,
		(Ustilago kollari); Barley stripe
		(Helminthosporium gramine)
Sorghum	1.25 oz	Covered kernel smut (Sphacelotheca)
Corn	1-1.5 oz	Helminthosporium, Pythium
Sugar beet	1-2 oz	Seed, seedling rots (Phoma betae)
		and damping (Pythium and
		Rhizoctonia)
Safflower	1-3 oz	Safflower rust (Puccinia carthami)

Do not apply this product through any type of irrigation system.

**IMPORTANT:** Do not use crops grown from Busan 30A-treated seed for grazing of livestock or for harvest as silage or forage for seven weeks after planting. However, grain harvested from plants grown from Busan 30A-treated seed can be used for food or feed. Label treated seed. Seeds treated with Busan 30A cannot be used for food, feed, oil production, or any other purpose except planting. Use with an EPA approved dye that imparts an unnatural color to the seed.

### HMS/NPCA RATING

Health 3 Flammability 2 Reactivity 1

EPA Reg. No. 1448-46

Product Weight 9.0 lbs/gal 1.08 Kg/L

NET CONTENTS MARKED ON

CONTAINER

Manufactured By EPA Est. No. 1448-46

BUCKMAN LABORATORIES, INC.

1256 N. McLean Blvd., Memphis, TN

38108

(901) 278-0330 or 1-800-BUCKMAN

ACCEPTED  
with COMMENTS  
to EPA Letter Dated

1994

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