

1448-55

4/30/2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 30 2001

Dennis Barbee
Buckman Laboratories
1256 N. McLean Blvd.
Memphis, TN 38108

RE: **Busan 30**
EPA Reg. No. 1448-55
Your Amendment Dated 2/6/2001

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to change the "First Aid" statements so that they now comply with PR Notice 2001-1, and to modify the use directions for "Leather", is acceptable with the following comments.

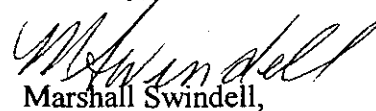
1. You must boldface each use title (eg., "**SLIME CONTROL IN PULP AND PAPER MILLS**"), and make all of them flush left. They are very difficult to locate and hard to read for our reviewers as presented. Also, you should insert breaks into the continuously running text. It's very difficult to find a particular item on this entire label.

2. As part of your next label amendment, you must clarify the use directions for "Wastewater Treatment Systems". First of all, list the type of systems you intend to use this product for (biological-activated sludge, physical-chemical, aerobic/anaerobic lagoons, trickling filters, rotating biological contactors, etc). Second, list specifically where you intend to use it. Biological systems such as activated sludge should not use the product where it will inhibit the biomass which does the degradation (eg., in aeration basins, etc). Do you plan to use it in the grit chambers, influent works, primary/secondary clarifiers, aerobic/anaerobic digesters, belt filter presses? For which influents and effluents is it intended to be used? Much more specific use directions are needed for this widely variable use category.

A stamped copy of the accepted (with comments) label is attached for your records.

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,



Marshall Swindell,
Product Manager Team 33,
Regulatory Management Branch I

CONCURRENCES Antimicrobials Division (7510C)

SYMBOL							
SURNAME							
DATE							

Busan 30

BUSAN is a registered trademark.

KEEP OUT OF REACH OF CHILDREN DANGER

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. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID

IF IN EYES: Hold eye 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 treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a 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 by a 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 ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. This product may pose an aspiration pneumonia hazard.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with 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 sewage systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS: Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

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

STORAGE: Do not expose to extreme temperatures. If applicable, 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. Keep container closed when not in use.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or residue 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.

Technical assistance in applying Busan 30 for microorganism control as described in the following is available upon request when a description of the problem is provided. **LEATHER:** Busan 30 is recommended for the prevention of mold, bacteria and fungi in the storage, transport and processing of wet leather stock such as pickled, vegetable-, chrome-, alternative metal or metal free tanned hides and skins. Dosage rates of 0.025-0.2% (250-2,000 ppm) of Busan 30 can be used on the white lime stock weight basis to prevent microbial growth on processed hides and skins. The dosage level used will depend on storage conditions and the length of protection required. A satisfactory dilution of 1 part Busan 30 plus 5 parts water can be prepared by adding the Busan 30 to water (as opposed to adding water to Busan 30) with agitation. The diluted product can then be added to the pickling liquor, or to the tanning liquor at the start of the tanning process or to the rinse water in a post tanning reflow. The product can also be applied during the fatliquoring process to prevent fungal growth at 0.025-0.2% (250-2,000 ppm) based on the split and shaved weight of leather being processed. Busan 30 can be used at the dosage rates suggested above in the processing of U.S. military specification shoe upper leathers. For preservation of leather finishing pastes and fatliquors, Busan 30 can be added at a dosage rate of 0.1 - 0.25% (1000-

ACCEPTED
with COMMENTS
in EPA Letter dated:

APR 30 2001

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

1448-55

2500 ppm) based on the weight of the treated paste or fatliquor and mixed thoroughly to insure adequate dispersion. **PULP MILLS:** To protect wood chips from fungal degradation during storage. Busan 30 is used at 0.5 to 2 lb/ton of oven-dry wood. It can be applied through a water shower or spray located in the pneumatic conveyor carrying chips from the chipper to the storage pile. For preservation of wet lap or sheet pulp, Busan 30 is used at 0.5 to 4 lb/ton of oven-dry fiber. It is applied to the surfaces of the dewatered pulp by means of sprays or applicator rolls. **PAPER MILLS:** To control bacterial and fungal growth on paper and paperboard machines, Busan 30 is added to the white water or stock at 0.1 to 0.5 lb/ton of dry paper or paperboard produced. To make mold-resistant paper or paperboard, Busan 30 is used at 0.05 to 0.1 lb/1000 sq ft (0.15 to 0.3 lb/3000 sq ft) of surface. For coated paper or board, Busan 30 is incorporated in the coating mix prior to application of the coating. For uncoated paper or board, Busan 30 is dispersed in water, surface-sizing solution, or other solvent and applied to the surface to be protected by means of an applicator roll. For the preservation of agricultural mulch paper, Busan 30 is used at 1.5 to 5 lb/ton air-dry paper. It is applied to the surfaces of the mulch paper by tub-sizing methods or by means of sprays or applicator rolls before the paper is coated. **PARTICLE BOARD:** Busan 30 is employed as a preservative for particle board, insulation board, and other wood-base fiber and particle panel materials. In this use, Busan 30 is mixed with the resin or binding agent at 0.1 to 1% based on the dry weight of the wood. **SAP STAIN CONTROL:** Busan 30 is used to control sap stain and mold on freshly cut softwood and hardwood lumber, logs, poles, posts, and timbers. It is applied by dipping, spraying, or pressure impregnation of the wood with a dispersion containing 0.5 to 8 gal of Busan 30 per 100 gal of water. Treatment should be made within 24 hr of cutting or sawing, particularly in warm weather, and treated wood should not be exposed to heavy rains soon after treatment. **COOLING TOWERS:** Busan 30 is used to protect cooling tower wood against soft or surface rot and internal or dry rot. It is applied by spraying or painting a dispersion containing 0.5 to 0.7% Busan 30 in water onto the clean wood surfaces. The amount applied should provide 0.6 to 0.8 lb Busan 30 per 1000 sq ft of wood surface. Soft or surface rot can also be inhibited by periodic shock doses of Busan 30 to the recirculating cooling water at the tower basin or cold well. The dosage should provide 1.25 lb of Busan 30 per 1000 gal of water and the bleedoff should be stopped for 4 to 6 hr after treatment. The shock treatment should be repeated every four months. **COOLING WATER:** Busan 30 is used to control algae, bacteria, and fungi in industrial recirculating cooling water systems. Before treatment is begun, the system should be cleaned thoroughly to remove old algal growth, microbiological slime, and other deposits. The system should then be drained, flushed, refilled with water, and treated with an initial dose of 0.6 to 3.7 fl oz Busan 30 per 1000 gal water in the system. Subsequent additions of 0.2 to 1.2 fl oz per 1000 gal should be made every 1 to 5 days, depending on amount of bleedoff and severity of microbiological fouling. **COATINGS, CAULKING-SEALANTS & WALLCOVER ADHESIVES:** Sufficient mixing to ensure adequate dispersion of the biocide is required. Busan 30 is added at 0.5 to 5.0% based on the total weight of the formulation to prevent fungal discoloration and deterioration. For solvent-based formulations Busan 30 can be dissolved in aromatic solvents or combinations of aromatic and aliphatic solvents and added in the let down or added directly to the finished products. For water-thinned latex emulsion formulations, Busan 30 can be premixed with the wetting agent and added to the pigment slurry or simply added to the let down or finished product. **DRILLING FLUIDS:** To inhibit bacterial and fungal degradation of the fluids or muds used in the drilling of wells, Busan 30 is incorporated in the drilling fluid at concentrations of 0.05 to 0.25% based on the total wet weight of the fluid. **PETROLEUM SECONDARY RECOVERY:** Busan 30 is used to control sulfate-reducing bacteria, slime-forming bacteria and fungi in oil-field water, polymer, or micellar floods, water-disposal systems, and other oil-field water systems at dosage rates of 0.2 to 3.7 fl oz of Busan 30 per 1000 gal of water treated. Additions should be made continuously or intermittently by means of a metering pump at the free water knockouts, before or after injection pumps and injection well headers. **Continuous Feed Method:** When system is noticeably fouled, add 0.6 to 3.7 fl oz Busan 30 per 1000 gal of water continuously until desired degree of control is achieved. Then treat with 0.2 to 1.2 fl oz Busan 30 per 1000 gal of water continuously, or as needed to maintain control. **Intermittent or Slug Method:** When system is noticeably fouled, or to maintain control, add 0.6 to 3.7 fl oz Busan 30 per 1000 gal of water for 4 to 8 hr per day and 1 to 4 times per week, or as needed to maintain control. **CUTTING FLUIDS:** Busan 30 is used to inhibit bacterial and fungal degradation of water-based and water-soluble or emulsifiable cutting fluids and coolants used in metalworking operations. It should be added to the diluted cutting fluid at a rate that will provide 150 to 250 parts per million Busan 30 (weight/weight) after final dilution with water. To prevent fungal growth on the inside walls of the diluted metalworking fluid storage tanks, higher concentrations of Busan 30 are needed. For this application, it is recommended that Busan 30 be added to the diluted fluid as it is prepared to provide a concentration of 1000 to 1250 parts per million. **CAULKING-SEALANTS & WALL COVERING ADHESIVES:** For details on the use of Busan 30 for the protection of these materials, refer to the bulletin "Busan 30 - Preservative for Caulking-Sealants and Vinyl Acetate Wall Covering Adhesives". **TEXTILES:** For directions on the use of Busan 30 to protect textiles from fungal degradation, refer to the bulletin "Busan 30 for the Preservation of Textiles". **WASTE WATER TREATMENT SYSTEMS:** When used as directed, Busan 30 controls bacteria and fungal slime in waste water systems and effluents. The quantity of Busan 30 required varies with the degree of fouling. It should be added at a rate that will provide 10 to 30 parts per million Busan 30 (weight/weight) of the waste water. This addition can be made at various points in the system including the influent to the clarifier and the holding basins or ponds.

ACTIVE INGREDIENTS:

2-(Thiocyanomethylthio)benzothiazole..... 30.0%
INERT INGREDIENTS:..... 70.0%
TOTAL..... 100.0%

HMIS/NPCA RATING

Health 3 Flammability 2 Reactivity 1

Product Weight: 9 lbs./gal. 1.08 kg/l
NET CONTENTS MARKED ON CONTAINER

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BUCKMAN LABORATORIES, INC.

1256 N. McLean Blvd.

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