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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 05 1995

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

Attention: Kevin D. Drake, Regulatory Toxicologist

Subject: Busan 1004
EPA Registration No. 1448-77
Your Amendment Dated July 12, 1995

The amendment (label update) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you:

1. Make the following labeling changes below before you release the product for shipment bearing the amended labeling.
 - a. Delete the letter "s" from the heading: Active Ingredient.
 - b. Place the ingredient statement to appear directly under the product name.
 - c. Revise the heading: First Aid to read: Statement of Practical Treatment.
 - d. Delete the statement: Measures against circulatory shock, respiratory depression and convulsion may be needed.
 - e. Add the following precautionary statement to the left panel: Wash thoroughly with soap and water after handling.
 - f. Revise the statent: "Remove and wash contaminated clothing before reuse" to read:

"Remove contaminated clothing and wash before reuse."

NOTE: This statement appears in two locations on the label.

- g. Revise the statement: "Harmful if swallowed" to read:

"Harmful or fatal if swallowed"							
CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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h. Revise the statement: "Causes eye damage. Causes severe skin irritation" to read: "Causes eye and skin damage."

i. The preferred nomenclature for the active ingredient is:

S-(2-Hydroxypropyl) thiomethanesulfonate

Revise accordingly.

2. The information in our files doesn't clearly indicate that your entire proposed product is cleared under the Federal Food, Drug and Cosmetic Act for the Use pattern, as declared on the label, that may come in contact with food, specifically coatings. Your options are:

- Include a restriction statement

or

- Submit a copy of an opinion letter from FDA that all the chemicals in your product are cleared.

or

- Delete the claim for coatings

NOTE: Our records do indicate clearance for paper in pulp\paper mills.

3. Just a reminder that a RED document is scheduled for the end of this year and additional label comments may be warranted for this product.

4. A release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

5. A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of the final printed label prior to release of the product for shipment.

If you have any questions concerning this letter, contact V. Goncarovs at 703-305-6663.

Sincerely yours,

Marion Johnson
Product Manager (31)
Antimicrobial Program Branch
Registration Division (7505C)

CONCURRENCES

SYMBOL	Enclosures						
SURNAME							
DATE							

BUSAN 1004

BUSAN is a registered trademark.

**KEEP OUT OF REACH OF CHILDREN
DANGER**

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes eye damage. Causes severe skin irritation. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling this product. Remove and wash contaminated clothing. Do not take internally.

FIRST AID: If product gets in eyes, flush with plenty of water for at least 15 minutes. Call a physician. In case of skin contact, wash thoroughly with soap and water. Remove and wash contaminated clothing before reuse. If product is 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. Call a physician immediately.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsion may be needed.

ENVIRONMENTAL HAZARDS: 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.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by 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 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, by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

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

Busan 1004 is used to control bacterial slime in pulp and paper mills. For this purpose, it should be added to the white water or stock at the rate of 2.7 to 27 ppm of Busan 1004, based on the total weight of fiber and water at maximum dilution, for treatment periods of 4 to 6 hours. When conditions favor very rapid bacterial slime growth, the Busan 1004 treatment should be repeated every 8 hours or every 12 hours, depending on the severity of the slime problem. Under average conditions of slime growth, the Busan 1004 treatment can be made once every 24 hours.

Busan 1004 is used to inhibit the bacterial degradation of coatings, surface sizes, internal sizes, and starch solutions used in

ACTIVE INGREDIENT
2-Hydroxypropyl methylol
INERT INGREDIENTS

the manufacture of paper and paperboard. It is also employed to inhibit bacterial growth in the manufacture of paints. For these applications as a preservative, Busan 1004 is used and protected at concentrations of 0.27% to 2.7% based on the total weight of solids.

ACCEPTED
with COM
In EPA List

OCT 05

Under the Federal
Fungicide, and
as amended, (1-
registered under

1448

HMS/NPCA RATING
Health 3 Flammability 1 Reactivity 1

Manufactured By EPA Est. No. 144
BUCKMAN LABORATORY
1256 N. McLEAN BLVD., MEMPHIS, TN 38119
(901) 278-0330 or 1-800-871-1448

Rev. 7/10/95