

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Carl Watson
Buckman Laboratories, Inc.
1256 N. McLean Blvd.
Memphis, TN 38108

APR 9 2010

Subject: Amendment dated November 19, 2009
SNMDC
EPA Reg. No. 1448-83
EPA Decision No. 428856

Dear Mr. Watson,

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable providing the following changes are made.

1. Move the Directions for Use section so that it appears prior to the Storage and Disposal box.
2. Amend the first sentence of Environmental Hazards text as follows. "This pesticide is toxic to mammals, birds, aquatic invertebrates and fish."
3. Change the heading "Container Disposal" to "Container Handling". Also within the storage and disposal statements, change the sentence "For containers larger than 55 gallons" to "For containers larger than 5 gallons". Also change the sentence starting "For containers 55 gallons and smaller" so it reads "For containers 5 gallons and smaller".
4. Include a Warranty/Limitation of Liability section.

One copy of the label stamped "Accepted with Comments" is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment.

If you have questions concerning this letter, please contact Shaunta Hill at 703-347-8961 or by email at hill.shaunta@epa.gov.

Sincerely,

Lisa Jones FOR

Shaja B. Joyner
Product Manager (20)
Fungicide Branch
Registration Division (7504P)

Enclosure



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ACTIVE INGREDIENT(S)

Sodium N-methyldithiocarbamate.....

33.0%

INERT INGREDIENTS.....

67.0%

TOTAL.....

100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

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 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 or doctor for treatment advice.
If Swallowed	- 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.

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if absorbed through skin. Causes skin and eye irritation. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS: This pesticide 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 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 In EPA Letter Dated APR 9 2010

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

1448-83

Storage and Disposal

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

PESTICIDE STORAGE: Do not expose to extreme temperatures. 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: Pesticide wastes are toxic. 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:

(Text for all nonrefillable containers)

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying.

{Liquid residue removal statement for nonrefillable containers with capacity of 5 gals or less}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for the later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

{Liquid residue removal statement for nonrefillable containers with capacity of >5 gals}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

(Text for all nonrefillable containers)

Then offer for recycling if available or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

{Text for refillable containers}

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

For containers larger than 55 gallons:

To clean the container prior to refilling or disposal, use a pressure wash as follows: Empty the remaining contents into application equipment or a mix tank. Use a pressure wash system that rinses all interior sides with water and that is rated at >40 psi and >120F. Pressure wash the container for a length of time that ensures that a minimum 25% of the container volume of water is used. During the pressure wash, ensure that the container valve is left open for continuous draining. Collect the rinsate and empty into application equipment or a mix tank or store rinsate for later use or disposal. Allow container to drain for 10 minutes after pressure wash is completed.

For containers 55 gallons and smaller:

To clean the container prior to refilling or disposal, use a triple rinse wash as follows: Empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously. Pour or pump rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this rinsing procedure two more times.

Do not discharge rinsate containing this product 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 rinsate containing this product to sewer systems without prior approval from the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Batch code: _____

Manufactured by **Buckman Laboratories, Inc.**
1256 North McLean Blvd., Memphis, Tennessee 38108, USA
(901) 278-0330 or 1-800-BUCKMAN

EPA Est. No. 1448-TN-1

EPA Reg. No. 1448-83

Product Weight **9.6 lbs./gal.**

Net contents are marked on the container.

HMIS / NPCA Ratings

Health 2 Flammability 1 Reactivity 1

Last Revision

11/18/2009



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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.

This product is for **FORMULATING USE ONLY** into EPA registered antimicrobials for the following uses: Leather Preservation and Industrial Water Treatment.

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. Formulators are also responsible for obtaining their own licenses for any uses or formulations of this material covered by patents. This label is **not** to be taken as a license to operate under, or recommendation to infringe, any patent.