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



EPA United States Environmental Protection Office of Pesticide Programs

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

AUG 1 2007

Attention: Kristin M. Miller

Subject: Busan 1058

EPA Registration No. 1448-103 Letter Dated July 11, 2007

This will acknowledge receipt of your notification to revise the flammability and reactivity rating on the label, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Agency has determined, after careful consideration, that the Notification dated May 29, 2007 to revise the flammability and reactivity rating on the label is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your files.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely

Marshall Swindell

Product Manager (33)

Regulatory Management Branch 1 Antimorobials Division (7510P)

Please read instructions on r	eyerse before completing form.	· (- -corm Approved. OMB No. 20	2 C
\$EPA	United States Environmental Protection Weshington, DC 2046		Registrat Amendm ✓ Other	ion OPP Identifier Nur
	Application	for Pesticide	- Section I	
1. Company/Product Number 1448-103	·	2. EPA Prod M. Swind	duct Manager ell	3. Proposed Classification None Res
4. Company/Product (Name) BUSAN 1058		PM# 33		
5. Name and Address of App Buckman Laboratorie 1256 N. McLean Blvd Memphis, TN 38108	s, Inc.	(b)(i), my (ted Reveiw. In accordant product is similar or identic NoName	
		Section - II		
Amendment - Explain Resubmission in responsible Notification - Explain	onse to Agency letter dated	A ₁	nel printed labels in repsonse gency letter dated de Too" Application. ther - Explain below.	to
	al page(s) if necessary. (For section lammability and reactivity rating.	l and Section II.)		
		Section - III		
1. Material This Product Will Child-Resistant Packaging Yes No * Certification must be submitted	Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. container	Water Soluble Pack Yes No If "Yes" Package wgt	eging 2. Type of C	Container Metal Plastic Glass Paper Other (Specify)
	container 55	5 & 250 gal, Bulk	5. Location of Labe	ol Directions
6. Manner in Which Label is	Affixed to Product Lithogra Paper g Stencile	iph lued id	Other	
		Section - IV		
1. Contact Point (Complete	items directly below for identification	of individual to be co		cess this enplication.)
Name Kristin M. Miller		Fitle Regulatory Affairs S	(((Telephone No. (Include Area (901)272-6770
İ	Cartificati	ion	e. t.	6. Date Application

2. Signature

both under applicable law.

3. Title

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Regulatory Affairs Specialist

4. Typed Name

Kristin M. Miller

5. Date

May 29, 2007

(Stamped)



BUCKMAN LABORATORIES INTERNATIONAL, INC.

1256 NORTH McLEAN BLVD.
MEMPHIS, TN 38108-1241 U.S.A.
TELEPHONE (901) 278-0330
FAX (901) 276-5343

www.buckman.com

e-mail; knetix@buckman.com

May 29, 2007

Marshall Swindell, PM 33
Document Processing Desk (NOTIF)
Off. of Pest. Prog. - AD (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re:

Label Notification

EPA Registration Numbers: 1448-103

Dear Mr. Swindell,

Buckman Laboratories submits this label notification for BUSAN 1058 (EPA Reg. # 1448-103) to revise the flammability and reactivity rating. No other changes were made to the label. Five (5) copies of the label are enclosed for your review.

RESEARCH & DEVEL OF

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of these products. I understand that it is a violation of 18 USC. § 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions or require any additional information pertaining to this action, please contact me at (901) 272-6770 or kmmiller@buckman.com.

Sincèrely,

Buckman Laboratories International, Inc.

Kristin M. Miller

Regulatory Affairs Specialist



BUCKMAN LABORATORIES INTERNATIONAL, INC.

1256 NORTH McLEAN BLVD.
MEMPHIS, TN 38108-1241 U.S.A.
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July 11, 2007

Marshall Swindell, PM 33 Document Processing Desk (LETTER) Off. of Pest. Prog. - AD (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 S. Crystal Drive Arlington, VA 22202

Re: Response to Agency Letter

EPA Registration Numbers: 1448-103

Dear Mr. Swindell,

As per our phone conversation on July 11, 2007, please find enclosed a copy of the agency letter date June 28, 2007 regarding our Notification that was found not acceptable. Can you please review to ensure that this is correct? The notification was submitted because the Flammability and Reactivity values in the HMIS/NFPA ratings text box on our label were lowered from a "2" to a "1". This information is not a requirement specified in the Label Review Manual nor has it previously been an action that required a label amendment. I have also enclosed a copy of the original notification application as per your request.

Your attention to this matter is greatly appreciated. If you have any questions or require any additional information pertaining to this action, please contact me at (901) 272-6770 or kmmiller@buckman.com.

Sincerely,

Buckman Laboratories International, Inc.

Kristin M. Miller

Regulatory Affairs Specialist

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



United States Environmental Protection Office of Pesticide Programs Agency

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

Attention: Kristin M. Miller

Subject: Busan 1058

EPA Registration No. 1448-103 Notification Dated May 29, 2007

This will acknowledge receipt of your notification to revise the flammability and reactivity rating on the label, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification dated May 29, 2007 to revise the flammability and reactivity rating on the label is not in compliance with PR Notice 98-10 and is not acceptable. This request must be handled under the Amendment Process along with a justification as to why the company needs to make this change.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely

Marshall Swindell

Product Manager (33)

Regulatory Management Branch 1

Antimorobials Division (7510P)



•	
ACTIVE INGREDIENT(S)	
ACTIVE MOREDIEM (C)	
Tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione	24.0
retariyaro-5,5-anitettiyi-217-1,0,0 anidete2550 2 anidete2550 2	
INERT INGREDIENTS	76.0
INCIN INDICEDIENTO:	
TOTAL	100.0
101AL	

KEEP OUT OF REACH OF CHILDREN DANGER

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. 		
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.			
NOTE TO PHYSICIAN			
Probable mucosal damage may contraindicate the use of gastric lavage.			

Precautionary Statements DS TO HUMANS AND DOMESTIC AN

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes severe eye damage and skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful if swallowed. Avoid contamination of food. May cause skin sensitization.

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 the requirements of a National Pollutant Discharge Elimination Systems (NPDES) permit and 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.

Directions for Use

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

PAPER MILL SLIME CONTROL: FOR THE CONTROL OF SLIME-FORMING AND/OR SPOILABACTERIA: BUSAN 1058 is added at a point in the system (raw stock chest, beater and/or ref chest, or machine chest-wirepit) where it will be uniformly mixed. Application may be continuous intermittent for a certain number of hours/day or per shift, depending upon system characteris Add 5 to 20 fluid ounces of BUSAN 1058 per ton of paper produced.

INTERMITTENT FEED METHOD: Apply 12 to 20 fluid ounces of BUSAN 1058 per ton (dry basis pulp or paper for 2 hours every 8 hours. Badly fouled process systems must be cleaned before in treatment. CONTINUOUS FEED METHOD: Apply 5 to 15 fluid ounces of BUSAN 1058 per ton basis) of pulp or paper produced on a continuous basis. Badiy foured process systems mus cleaned before initial treatment.

OILFIELD DRILLING MUDS AND WORKOVER OR COMPLETION FLUIDS: FOR CONTROL SLIME-FORMING AND/OR SPOILAGE BACTERIA: Determine the total volume of the circula system. Calculate the number of gallons of BUSAN 1058 needed to produce a concentration of 2, ppm (0.73 lb/bbl) of BUSAN 1058 in the drilling mud circulating system. For example, 75 gallon BUSAN 1058 per 1000 barrels of drilling fluid will produce the proper concentration. For best resadd BUSAN 1058 in a thin stream to the mud pit while the drilling fluid is circulating. As the twolume increases, due to greater well depth, add additional BUSAN 1058 to maintain the proconcentration. Because of the wide variation in drilling mud composition and bacterial contaminate greater or lesser amounts of the BUSAN 1058 may be prescribed.

OILFIELD WATER TREATMENT AND WATER FLOODS: FOR CONTROL OF SLIME-FORM AND/OR SPOILAGE BACTERIA: Calculate the total volume of water to be treated. Using this volucal calculate the number of gallons of BUSAN 1058 needed to produce concentration of approxima 2500 ppm BUSAN 1058. For example, 2.1 gallons of BUSAN 1058 per each 1000 gallons of two volume will produce this dilution. 350 ppm BUSAN 1058, added each week, is recommended maintain bacterial control. This may be accomplished by adding 0.30 gallons of BUSAN 1058 to end 1000 gallons of total volume. Because of the wide variation in waters found in the oil field, greated lesser amounts of BUSAN 1058 may be required in a particular location.

FOR THE PRESERVATION OF CLAY SLURRIES, ADHESIVES, COATINGS AND HIGH VISCOS SUSPENSIONS: For preservation of slurries and high viscosity suspensions, BUSAN 1058 should added at a point in the processing system where there will be sufficient time and agitation for g mixing and dispersion. Add BUSAN 1058 at use levels of 0.04-0.45%, by weight, based on the t formulation in slurries of starch, clay, calcium carbonate, or titanium dioxide; paper coatings; I viscosity suspensions (e.g., polymers, silica-polymer combinations); polyvinyl alcohol/polyv acetate-based adhesives; starch-based adhesives; dextrin-based adhesives. The exact amount material to be added for the preservation of any given formulation will depend on the components local storage time and conditions. Dosage rates should be determined by actual tests.

RECIRCULATING COOLING WATER SYSTEMS: FOR CONTROL OF ALGAE, FUNGI AND SLIFORMING BACTERIA: Dosages for recirculating cooling water systems will depend on the condit of the system prior to treatment initiation. Systems which are heavily contaminated should cleaned first. Apply BUSAN 1058 to the cleaned system when growth is first noticed according to following schedule.

INITIAL DOSE: Apply 3.25 - 6.5 fluid ounces (30 - 60 ppm) of BUSAN 1058 per each 1000 gallon water in the system. This dose may be a continuous treatment or applied once, twice or three tir weekly or as required to control the growth of slime forming organisms.

SUBSEQUENT DOSAGE: When microbial control is evident add 0.5 - 3.25 fluid ounces (5 - 30 pl of BUSAN 1058 per 1000 gallons of water in the system as a continuous treatment daily or exthree days or as required to maintain control.