1448-115

3/18/2004

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 18 2004

Buckman Laboratories, Inc. 1256 N. McLean Blvd. Memphis, TN 38108-1241

Attention: Jody L. Stobbe

Senior Regulatory Specialist

Subject: NM-875-11

EPA Registration No. 1448-115 Amendment Dated March 5, 2004

This will acknowledge receipt of your notification to add the statement, "Not registered for this use in California" to the Industrial Water Purification Systems use pattern, 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 March 5, 2004 is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

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

Antimicrobial Division (7510C)

	CONCURRENCES						
SYMBOL							
SURNAME		1					
DATE						-	
OFFICIAL FILE COP							

Form Approved, OMB No. 2070-0060, Approvel expires 2-28-95

United States Environmental Protect Washington, DC 20	tion Agend	су	Registra Amendr Other		OPP Identifier Number
Applicat	ion for Pe	sticide - Sectio	n l		
1. Company/Product Number 1448-115	2. EPA Product Menager 3 Marshall Swindell			3. Pro	oposed Classification
4. Company/Product (Name) NM-875-11	PM# 33				
5. Name and Address of Applicant (Include ZIP Code) Buckman Laboratories, Inc. 1256 North McLean Blvd. Memphis, TN 38108  Check if this is a new address	6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No.				
	Section	Product Name			
Amendment - Explain below.  Resubmission in response to Agency letter dated  Resubmission in response to Agency letter dated  Resubmission in response to Agency letter dated  Me Too" Application.  Other - Explain below.  Child-Resistant Packaging  Yes  No  Final printed labels in repsonse to Agency letter dated  "Me Too" Application.  Other - Explain below.  Other - Explain below.  Other - Explain below.  Other - Explain below.  Explanation: Use additional pege(s) if necessary. (For section I and Section II.)  Addition of "Not registered for this use in California." to the Industrial Water Purification Systems use pattern. First Aid correction: "If Ingested" changed to "if Swallowed" per label amendment submitted January 19, 2004.  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 if 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 benalties under sections 12 and 14 of FIFRA  Section - III  1. Meterial This Product Will Be Packaging  Ves  No  Weter Soluble Packaging  Ves  Metal  Plastic  Glass  Paper  Other (Specify)					
[   [ ]	etail Conteiner 5. Location of Label Directions			ons	
6. Manner in Which Label is Affixed to Product   Lithograph   Other   Paper glued   Stenciled					
Section - IV					
1. Contact Point (Complete items directly below for identificat	tion of individu	ial to be contacted, if n	ecessary, to pre	ocess this	application.)
Name Jody L. Stobbe	i i			Telephone 901-272-	e No. (Include Area Code) 8550
Certification  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.  6. Date Application  Recoived  (Stamped)					Recrived
2. Signature  Pooly Y. Stolle	3. Title Senior Regulatory Specialist				p 7
4. Typed Name Jody L. Stobbe	5. Date March 5, 2004				*

read instructions on reverse before completing form.



1256 NORTH McLEAN BLVD

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MEMPHIS, TN 38108-1241 U.S.A. TELEPHONE (901) 278-0330

BUCKMAN LABORATORIES INTERNATIONAL, INC.

March 5, 2004

Marshall Swindell, PM 33 Regulatory Management Branch I US Environmental Protection Agency Antimicrobials Division, 7510C Room 266A, Crystal Mall 2 1921 Jefferson Davis Hwy

Re:

Label Notification per PR Notice 98-10

NM-875-11, EPA Registration Number: 1448-115

Dear Mr. Swindell,

Arlington, VA 22202

Please find enclosed a label Notification per PR Notice 98-10 to add the statement, "Not registered for this use in California." to the Industrial Water Purification Systems use pattern. Please also note that "If Ingested" has been corrected to "If Swallowed" in the First Aid Statement. The latter change was submitted via amendment on January 19, 2004, and is currently under review.

I trust that you will find this information satisfactory. If you have any questions or require any additional information pertaining to this action, please contact me at (901) 272-8550 or ilstobbe@buckman.com.

Sincerely,

BUCKMAN LABORATORIES INTERNATIONAL, INC.

Jody L. Stobbe

Senior Regulatory Specialist



## NM-875-11

ACTIVE INGREDIENT(S)	
Disodium cyanodithioimidocarbonate	3,68%
Potassium N-methyldithiocarbamate	5.07%
INERT INGREDIENTS.	91.25%
TOTAL	100.00%

## KEEP OUT OF REACH OF CHILDREN

	DANGER _
	FIRST AID
If in Eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
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.
£.	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.
lf Inhaled	Nove 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
or going fo	roduct container or label with you when calling a Poison Centrol Center or doctor or treatment. You may also contact 901-278-0330 or 1-800-BUCKMAN for medical treatment information.
	NOTE TO PHYSICIAN
Probable n	nucosal damage may contraindicate the use of gastric lavage.

## **Precautionary Statements** HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Harmful if absorbed through skin or inhaled. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, protective clothing and rubber gloves. Harmful or fatal if swallowed. Avoid contamination of food. Wash thoroughly after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS: 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 Systems (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.

Directions for Use it is a violation of Federal law to use this product in a manner inconsistent with its labeling.

COOLING WATER SYSTEMS: NM-875-11 is used to inhibit the growth of microorganisms in industrial, commercial, and institutional cooling water systems. In noticeably fouled systems, NM-875-11 should be added at a rate of 6.9 to 13.9 ft, oz. of NM-875-11 per 1000 gallons of system water (56-115 ppm) until control is evident. Subsequent additions of NM-875-11 should be made to the system as needed at a rate of 2.3 to 13.9 ft. oz. of NM-875-11 per 1000 gallions of system water (20-115 ppm) to maintain control. The frequency of treatment depends upon the severity of the microbiological problem. For best results, the system should be cleaned prior to treatment.

INDUSTRIAL WATER PURIFICATION SYSTEMS: NM-875-11 is used to control microbiological fouling in industrial water purification systems including reverse osmosis systems, filters, clarifiers, and ion exchange equipment. For off-line treatment, NM-875-11 should be fed at a concentration of 24.5 to 49.0 fl. oz. per 1000 gallons of water (200-400 ppm) for 4 to 8 hours. For on-line maintenance treatment, dosing of 4.9 to 9.8 fl. oz. NM-875-11 per 1000 gallons of water (40-80 ppm) for 6 to 12 hours should be made once a week or as needed to maintain control. Not intended for use in potable water systems. Attractistered for this use in California.

> Do not contaminate water, for PESTICIDE STORAGE: Do than five drums high. Dru damaged drums should be absorbed in sawdust or sand when not in use.

> PESTICIDE DISPOSAL: P pesticide, spray mixture, or be disposed of by use acco **Environmental Control Ager** Regional Office for guidance CONTAINER DISPOSAL:

> Metal: Triple rinse (or equiva and dispose of in a sanitary authorities.

Plastic: Triple rinse (or equiv and dispose of in a sanitar authorities, by burning. If bu

Manufactured by

1256 North McLean B EPA Est. No. 144

EPA Reg. No.

**Product Weight** 

144

8.8 HMIS / NPC

Health 3 Flammabili