

DEC 07 2001

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

Attention: Carl F. Watson, Ph.D
Regulatory Toxicologist

Subject: M-20-1
EPA Registration No. 1448-147
Amendment Dated May 24, 2000

This submission is in response to your eight month product reregistration for Methylene bis(thiocyanate) Reregistration Eligibility Decision (RED). According to our records, the science reviews have been completed. However, since this product contains multiple active ingredients, one of which is not eligible for reregistration at this time, the Agency can only provide you with an amended stamped label until the other active ingredient becomes reregistered. Please be advised that you are still obligated to satisfy the reregistrations for the other active ingredient.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the following labeling changes:

- 1. As per the acute toxicity review dated February 27, 2000 and PR Notice 2001-1, the heading Statement of Practical Treatment must be changed to "First Aid" and the Statements must be revised to read as follows:

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. Call a poison control center or doctor for treatment advices.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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.

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.

IF INHALED:

Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

NOTE: The following information must be added in a separate paragraph at the ending of the First Aid statements.

“For additional information in case of emergency call toll free (telephone number).

“Have the product container or label with you when calling a poison control center or doctor or going for treatment.”

2. As per the Label Review Manual and acute toxicity review dated February 27, 2000, the Spanish signal word “PELIGRO” must be added to the label and must appear in close proximity to the English signal word “DANGER”.

3 As per the acute toxicity review, the following statements must be modified in the “Hazards To Humans and Domestic Animals” section.

A. The statement “Causes irreversible eye damage and causes skin burns” must be changed to “Causes irreversible eye damage or causes skin burns”.

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B. The statement "May be fatal if swallowed or absorbed through skin" must be changed to "May be fatal if swallowed or absorbed through skin or inhaled".

C. The statement "Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals." must be added to Hazards to Humans and Domestic Animals section.

3. As per the product chemistry review dated June 6, 2001, the following text must be added under the Physical and Chemical Hazards:

"Combustible. Do not use or store near heat or open flame"

A stamped copy of the labeling is enclosed for your records.

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)

Enclosure

M-20-1

ACCEPTED
with COMMENTS
in EPA Letter Dated:

DEC 07 2001

KEEP OUT OF REACH OF CHILDREN
DANGER

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 1448-147

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, causes irreversible eye damage and causes skin burns. May be fatal if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Mixers, loaders, applicators, and other handlers must wear long-sleeve shirt and long pants; shoes plus socks; protective eyewear, chemical-resistant apron, and chemical-resistant gloves such as nitrile or PVC. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent, and hot water. Keep and wash PPE separately from other laundry. User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. User should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. This product may cause skin sensitization in some people. **STATEMENT OF PRACTICAL TREATMENT (FIRST AID):** If in eyes: Call a physician. Hold eyelids open and flush with a steady gentle stream of water for about 15 minutes. If on skin: Wash with plenty of soap and water. Get medical attention. If swallowed: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Get medical attention. Do not induce vomiting as this may cause aspiration pneumonia. If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention. Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. **ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. 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.

PHYSICAL AND CHEMICAL HAZARDS: Do not expose to extreme temperatures.

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 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. Wastes resulting from the use of the product, excess pesticide, spray mixture, or rinsate must be collected and disposed at an approved disposal facility. 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.

NOTE TO USER: Do not apply this product in a way that will contact workers or other persons.

COOLING TOWERS: M-20-1 is used to protect cooling tower wood against soft or surface rot and internal or dry rot. It is applied by painting a dispersion containing 0.5% to 0.7% M-20-1 in water onto the clean wood surfaces. The amount applied should provide 0.8 to 0.8 lb M-20-1 per 1000 sq. ft. of wood surface. Soft or surface rot can also be inhibited by periodic shock doses of M-20-1 to the recirculating cooling water at the tower basin or cold well. The dosage should provide 1.25 lb of

ACTIVE INGREDIENTS:

Methylene bis(thiocyanate)..... 10.0%
2-(Thiocyanomethylthio)benzothiazole..... 10.0%
INERT INGREDIENTS:..... 80.0%
TOTAL..... 100.0%

*One gallon of product contains 0.84 lbs of each active ingredient

M-20-1 per 1000 gal. of water and the bleedoff should be stopped for 4 to 6 hours after treatment. The shock treatment should be repeated every four months. **COOLING WATER:** M-20-1 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 with water, and treated with an initial dose of 0.8 to 3.7 fl oz M-20-1 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 the amount of bleedoff and severity of microbiological fouling.

DRILLING FLUIDS: To inhibit bacterial and fungal degradation of the fluids or muds used in the drilling of wells, M-20-1 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:** M-20-1 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 3.9 to 13.0 fl oz M-20-1 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 3.9 to 13.0 fl oz M-20-1 per 1000 gal of water continuously until desired degree of control is achieved. Then treat with 3.9 to 13.0 fl oz M-20-1 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 3.9 to 13.0 fl oz M-20-1 per 1000 gal of water for 4 to 8 hours per day and 1 to 4 times per week, or as needed to maintain control. **CRUDE AND REFINED OILS:** M-20-1 is an oil-soluble preservative for the control of bacteria and fungi that cause the degradation of crude oil and refined oils during storage. It should be added to the oil as it is being transferred from the shipping container to the storage tank at the rate of 0.8 to 6.0 fl oz M-20-1 per 1000 gal of oil. Addition should be made batchwise where mixing occurs or continuously to the suction side of the transfer pump.

FUEL: M-20-1 can be used to eliminate and/or prevent the growth of bacteria and fungi in distillate and residual fuels including Gasoline, Diesel #1, Diesel #2, and Bunker C. M-20-1 is intended for use in applications where residual and distillate fuels are used such as: bulk storage tanks, locomotive fuel tanks, diesel trucks, diesel boats and ships, farm equipment, construction equipment, and diesel generators. M-20-1 should be added to the fuel at a rate of 3.0 to 6.0 fl oz per 1,000 gal. M-20-1 should be fed by injecting the product into the fill line as the fuel is being added or added batchwise while the fuel is being added to ensure adequate mixing. For contaminated systems M-20-1 should be added at a shock dose of 6.0 fl oz per 1000 gal. (see table below) For clean systems, the maintenance dose is 3.0 to 6.0 fl oz per 1,000 gal. (see table)

Gallons of Fuel	Shock Treatment	Maintenance Treatment
100	0.5 fluid ounces	0.3 fluid ounces
250	1.5 fluid ounces	0.75 fluid ounces
500	3.0 fluid ounces	1.5 fluid ounces
1,000	6.0 fluid ounces	3.0 fluid ounces
5,000	30.0 fluid ounces	15.0 fluid ounces
10,000	60.0 fluid ounces	30.0 fluid ounces

M-20-1 is NOT for use in Aviation Fuels.

HAZARD RATING
Health 3 Flammability 2 Reactivity 1

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

EPA Reg. No. 1448-147

Manufactured By EPA Est. No. 1448-TN-1
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