1448 - 147

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

3/2/2010



Buckman Laboratories, Inc. 256 N. McLean Blvd. Memphis, TN 38108

MAR 0 2 2010

Attention: Carl F. Watson, Ph.D.

Subject: M-20-1 EPA Registration No. 1448-147 Amendment Dated January 19, 2010

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment

- Revise Storage and Disposal Section per PR Notice 2007-4

General Comment

A stamped copy of the "accepted" label 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 Antimicrobials Division (7510P)

Enclosure

M-20-1

ACTIVE INCREDIENT(S)

(CEPTED with COMMENTS EPA Letter Dated:



MAR - 2 2010

Ao mie monepientio)
2-(Thiocyanomethylthio)benzothiazole
Methylene bis(thiocyanate)
INERT INGREDIENTS
TOTAL

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

*One gallon of product contains 0.85 lbs of each active ingredient..

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO

1	FIRST AID			
lf 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. 			
lf 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. 			
lf 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. 			
lf Inhaled	- Move person to fresh air. - If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-noouth if possible. - Call a poison control center or doctor for further treatment advice.			
	HOT LINE NUMBER			
	product container or label with you when calling a Poison Control Center or doctor or going for treatment. also contact 901-767-2722 for emergency medical treatment information.			
	NOTE TO PHYSICIAN			
Probable	e mucosal damage may contraindicate the use of gastric lavage.			

Precautionary Statements HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage or skin burns. May be fatal if swallowed or absorbed through skin c inhaled. Do not get in eyes, on skin, or on clothing. Do not breathe spray mist. Prolonged or frequently repeated skin contac may cause allergic reaction in some individuals.

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 absorber 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, an 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. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. For terrestrial uses, do not apply directly to water, or to area: 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 loce sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS: Combustible. Do not use or store near heat or open flame.

M-20-1

ACCEPTED with COM____INTS EPA Letter Dated:



MAR - 2 2010

Under the Federal Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. / 448-147

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:

(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 ¼ 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 ¼ 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 of 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 refiliable 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			
EPA Est. No.	1448-TN-1 1448-147		
EPA Reg. No. Product Weight	9 lbs/gal. 1.08 kg/L	Net contents are marked on the container.	
	NPCA Ratings nability 2 Reactivity 1		Last Revision 1/15/2010

M-20-1



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 0.6 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 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.

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For treatment of cooling tower systems greater than or equal to 4000 gallons: Do not apply by open pouring of M-20-1 to cooling tower systems. A metering pump delivery system is required for this use and application method.

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, refilled with water, and treated with an initial dose of 0.6 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.

For treatment of cooling tower systems greater than or equal to 4000 gallons: Do not apply by open pouring of M-20-1 to cooling water systems. A metering pump delivery system is required for this use and application method.

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 0.6 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 floz 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) ACCEDTER

Gallons of Fuel 100 250 500 1,000 5,000 10,000	Shock Treatment 0.6 fluid ounces 1.5 fluid ounces 3.0 fluid ounces 6.0 fluid ounces 30.0 fluid ounces 60.0 fluid ounces	30.0 huid ounces	MAR - 2 2010 Inder the Federal Insecticide, Rungicide, and Rodenticide Act as amended for the
M-20-1 is NOT for use	in Aviation Fuels.		registered under EPA Reg. No./448-/47

This diesel fuel additive does not comply with federal ultra-low sulfur content requirements for use in model year 2007 and newer diesel motor vehicles or model year 2011 and newer diesel nonroad equipment engines.