1448-148 2/18/2010 1 of 6

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Buckman Labratories, Inc.
1256 North McLean Blvd
Memphis, TN 38108-124

FEB 18 2010

Attention: Carl Watson
Regulatory Manager

Subject: Notification
M-20-2
EPA Reg. No. 1448-148
Amendment Letter dated January 19, 2010

This will acknowledge receipt of your notification for the aforementioned product labels, submitted under the provisions of FIFRA Section 3(c) (9). Based on a review of the submitted material, the following apply:

- Updating container disposal language per PR Notice 2007-4

The Notification 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 Demson Fuller at (703) 308-8062.

Sincerely,

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510C)

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060, Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [x] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
1448-148	Marshall Swindell	[ ] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
M-20-2	33	

5. Name and Address of Applicant *(Include ZIP Code)*

Buckman Laboratories, Inc.
1256 N. 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. _____

Product Name _____

Section - II

- [x] Amendment - Explain below.
- [ ] Final printed labels in response to _____
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.

Explanation: Use additional page(s)

Label Amendment: Non-PRIA action.
ACTION: Revise the Storage & Dispose

Contact: cfwatson@buckman.com; FAX.

DF
332

1. Material This Product Will Be Packag

Child-Resistant Packaging	Unit Packa	
[ ] Yes [ ] No	[ ] Yes [ ] No	tainer etal astic ass per
* *Certification must be submitted*	If "Yes" Unit Packa	container [ ] Other (Specify) _____

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [ ] Container		[ ]

6. Manner in Which Label is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Carl Watson	Sr. Regulatory Toxicologist	(901) 272-6228

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 Received (Stamped)

2. Signature	3. Title
Carl F. Watson	Sr. Regulatory Toxicologist
4. Typed Name	**5. Date**
Carl F. Watson, Ph.D.	19 January 2010

Buckman INTERNATIONAL

Buckman Laboratories International, Inc.
1256 North McLean Blvd.
Memphis, TN 38108-1241 USA

(901) 278-0330 Tel
(901) 276-5343 Fax
buckman.com

January 19, 2010

Marshall Swindell, PM 33
Regulatory Management Branch I
Antimicrobial Division (H7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22203-4501

Re: Label Revisions: PR Notice 2007-4 Pesticide Container and Containment Rule
EPA Reg. Nos.: 1448-47, -80, -81, -102, -147, 148, -149, -150, -152, -153, -171, -172, -375, -377, -381, & -382

Dear Mr. Swindell:

Buckman Laboratories submits the following amendment for the product labels listed below:

BUSAN 52 (EPA Reg. # 1448-47)
BUSAN 1009 (EPA Reg. # 1448-81)
BUSAN 1071 (EPA Reg. # 1448-102)
M-20-1 (EPA Reg. # 1448-147)
M-20-2 (EPA Reg. # 1448-148)
T-30-1 (EPA Reg. # 1448-149)
T-30-2 (EPA Reg. # 1448-150)
T-5-1 (EPA Reg. # 1448-152)
T-5-2 (EPA Reg. # 1448-153)
M-5-1 (EPA Reg. # 1448-171)
M-5-2 (EPA Reg. # 1448-172)
MECT F (EPA Reg. # 1448-375)
BUSAN 1009WB (EPA Reg. # 1448-377)
DIMET (EPA Reg. # 1448-381)
NABE-M (EPA Reg. # 1448-382)
METHYLENE BIS(THIOCYANATE) (EPA Reg. # 1448-80)

Please find enclosed the EPA application Form 8570-1 and 5 copies of the draft revised labels incorporating changes per comments from PR Notice 2007-4 regarding the Pesticide Container and Containment Rule. If you should you have any questions or require additional information, please feel free to contact me or Crystal Brown at (901) 272-8258 (cwbrown@buckman.com).

Sincerely,

BUCKMAN LABORATORIES INTERNATIONAL, INC.

Carl F. Watson, Ph.D.
Sr. Regulatory Toxicologist

M-20-2

Buckman

ACTIVE INGREDIENT(S)	
2-(Thiocyanomethylthio)benzothiazole	10.0%
Methylene bis(thiocyanate)	10.0%
INERT INGREDIENTS	80.0%
TOTAL	100.0%

(Contains Heavy Aromatic Naphtha and Petroleum Distillates)

The product contains methylene bis(thiocyanate) and 2-(thiocyanomethylthio)benzothiazole each at 0.90 pounds active ingredient per gallon.

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO

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 901-767-2722 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage. This product may pose an aspiration pneumonia hazard.

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 or inhaled. Do not get in eyes, on skin, or on clothing. Do not breathe spray mist. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

Personal Protective Equipment (PPE)

Applicators and all other handlers must wear: Coveralls over long-sleeved shirt and long pants; socks and chemical resistant footwear; goggles or face shield; chemical-resistant gloves such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride or viton; and respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C); or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G); or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P, or HE prefilter. In addition to the PPE listed above, mixers, loaders, and cleaners of equipment must also wear chemical-resistant apron.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not apply in marine and/or estuarine oil fields. 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: Combustible. Do not use or store near heat or open flame.

M-20-2

Buckman

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 drum 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 containers closed when not in use.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 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 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 1-800-282-5626

EPA Est. No. 1448-TN-1

EPA Reg. No. 1448-148

Product Weight 9 lbs/gal. 1.08 kg/L

Net contents are marked on the container.

HMIS / NPCA Ratings

Health 3 Flammability 2 Reactivity 1

Last Revision

1/15/2010

M-20-2

Buckman

Directions for Use

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

COOLING TOWERS: M-20-2 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-20-2 in water onto the clean wood surfaces. The amount applied should provide 0.6 to 0.8 lb M-20-2 per 1000 sq. ft. of wood surface. Soft or surface rot can also be inhibited by periodic shock doses of M-20-2 to the recirculating cooling water at the tower basin or cold well. The dosage should provide 1.25 lb of M-20-2 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.
For treatment of cooling tower systems greater than or equal to 4000 gallons: Do not apply by open pouring of M-20-2 to cooling towers systems. A metering pump delivery system is required for this use and application method.

COOLING WATER: M-20-2 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-20-2 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-20-2 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-20-2 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-20-2 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-20-2 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-20-2 per 1000 gal of water continuously until desired degree of control is achieved. Then treat with 3.9 to 13.0 fl oz M-20-2 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-20-2 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-20-2 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-20-2 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-20-2 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-20-2 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-20-2 should be added to the fuel at a rate of 3.0 to 6.0 fl oz per 1,000 gal. M-20-2 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-20-2 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	0.6 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-20-2 is NOT for use in Aviation Fuels.

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.