UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 1 0 2003

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

Attention: Kristin M. Miller

Regulatory Affairs Specialist

Subject: D-25-1

EPA Registration No. 1448-198 Notification Dated March 24, 2003

This will acknowledge receipt of your notification to include additional label layout comments, submitted under the provisions of FIFRA Section 3(c)9. Based on a review of the submitted material, the following comments apply.

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 Martha Terry at (703) 308-6217.

Martha Sterry Don

Marshall Swindell

Product Manager (33)

Regulatory Management Branch 1 Antimicrobial Division (7510C)

CONCURRENCES								
SYMBOL								
SURNAME	I							
DATE								

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	2. Form Apr	Prove MB No.	2070-0060, Approval expires 2-28-				
SEPA Environmental Prote Washington, D	ection Agency	Registr Amend COther	1				
Applic	ation for Pesticide - Sec	tion I					
1. Company/Product Number 1448-198	2. EPA Product Man M. Swindell	EPA Product Manager M. Swindell					
4. Company/Product (Name) D-25-1	PM# 33						
5. Name and Address of Applicant (Include ZIP Code) Buckman Laboratories, Inc. 1256 N. McLean Blvd. Memphis, TN 38108	(b)(i), my product i to:	s similar or iden	ance with FIFRA Section 3(c)(3) tical in composition and labeling				
Check if this is a new address	Product Name	Product Name					
	Section - II	·					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below. Explanation: Use additional page(s) if necessary. (For s Notification: Revised Label Layout	Agency lett "Me Too" A Other - Exp	application.	se to				
	Section - III						
1. Material This Product Will Be Packaged In:			1				
Child-Resistant Packaging Yes No No	Water Soluble Packaging Yes No	2. Type of	of Container Metal Plastic Glass				
* Certification must If "Yes" No. pe be submitted Unit Packaging wgt. contain			Paper Other (Specify)				
3. Location of Net Contents Information 4. Size(s) Retail Container	stail Container 5. Location of Lal					
6. Manner in Which Label is Affixed to Product	ithograph Other Paper glued Stenciled	to the second					
	Section - IV						
1. Contact Point (Complete items directly below for identifi	ication of individual to be contacted, i	if necessary, to pr	rocess this epplication.)				
Name Kristin M. Miller	Title Regulatory Affairs Specialist	1					
Cert I certify that the statements I have made on this form I acknowledge that any knowlingly false or misleadin both under applicable law.							
2. Signature, MARN MILLER	3. Title Regulatory Affairs Specialist		1				

5. Date

Kristin M. Miller

March 24, 2003



NEEP OUT OF REACH OF CHILDREN DANGER

<u> </u>						
FIRST AID						
lfin Eyes	- Hold eyes open and rinse slowly and gently with water for 15-20 minutes Remove contact tenses, 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 for treatment advice.					
If Ingested	- 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-mouth if possible. - Call a poison control center or doctor for further treatment advice.					
	HOT LINE NUMBER					
or going	product container or label with you when calling a Poison Control Center or doctor for treatment. You may also contact 901-278-0330 or 1-800-BUCKMAN for by medical treatment information.					
	NOTE TO PHYSICIAN					
Probable	mucosal damage may contraindicate the use of gastric lavage.					

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, Causes eye and skin damage. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Avoid Contamination of food. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly after handling.

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 System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systmes 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: D-25-1 is used to inhibit the growth of microorganisms industrial, commercial and institutional cooling water systems. In noticeably fouled systems, D-25-1 should be added daily at a rate of 4.5 to 6.8 ft. oz. of D-25-1 per 1000 gallons of system water (40 - 60 ppm) until control is evident. Subsequent additions of D-25-1 should be made to the system as needed at a rate of 2.3, to 6.8 ft. oz. of D-25-1 per 1000 gallons of system water (20-60 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 AIR WASHER SYSTEMS: D-25-1 is used to inhibit the growth of microorganisms in industrial air washer systems. In noticeably fouled systems, D-25-1 should be added at a rate of 10.6 to 13.6 fl. oz. of D-25-1 per 1000 gallons of water (90-120 ppm) until control is evident. Subsequent additions of D-25-1 should be made to the system as needed at a rate of 7.9 to 13.6 fl. oz. of D-25-1 per 1000 gallons of water (70-120 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

PETROLEUM SECONDARY RECOVERY WATERFLOODING OPERATIONS: D-25-1used to control sulfate-reducing bacteria in petroleum secondary waterflooding operations. In systems fouled with microbiological deposits, D-25-1 should be added as a slug dose to provide a concentration of 16 to 32 ppm (1.9 to 3.8 fl. oz. of D-25-1 per 1000 gal. of water treated). This should be followed by a continuous addition of D-25-1 employing a chemical metering pump to maintain a concentration of 16 ppm, based on the total weight of water treated. Both slug additions and continuous addition of D-25-1 should be made at the heater-treater pump, gathering lines, or receiving tanks. Additions should always be made upstream of the filter. D 25-1 is also used to inhibit the growth of fungi and bacteria in water-based drilling muds, completion fluids, packer fluids, and other water-based fluids containing starch, gums, sugars, or other organic materials. For these purposes, D-25-1 is added at rates of 5.65 to 9.5 gal. per 100 barrels of fluid (0.13 to 0.23% by volume).

INDUSTRIAL WATER PURIFICATION SYSTEMS: D-25-1 is used to control microbiological fouling in industrial water purification systems including reverse osmosis, filters, clarifiers, and ion exchange equipment. For off-line treatment, D-25-1 should be fed at a concentration of 9.2 to 23.0 ft. oz. per 1,000 gallons of water (80-200 ppm) for 4 to 8 hours. For on-line maintenance treatment, feeding 2.3 to 4.6 ft. oz. D-25-1 per 1,000 gallons of water (20-40 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.

Do not contaminate water PESTICIDE STORAGE than four drums high. L for disposal. Spill should landfill. Keep container PESTICIDE DISPOSAL excess pesticide, spray cannot be disposed of Pesticide or Environmen your EPA Regional Offic CONTAINER DISPOSA PLASTIC: Triple rinse puncture and dispose of local authorities, by burn METAL: Triple rinse (puncture and dispose of and local authorities.

Manufactured by

1256 North McLea

EPA Est. No.

Product Weight

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