

1448-198

3/18/2004

Page 184

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

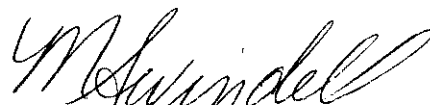
Subject: D-25-1
EPA Registration No. 1448-198
Amendment Dated March 6, 2004

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 6, 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							
DATE							

284



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1448-198	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) D-25-1	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Buckman Laboratories, Inc. 1256 North McLean Blvd. Memphis, TN 38108 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. 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

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(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. Correction of typographical error in First Aid Statement: "If Ingested" changed to "If Swallowed".

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 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 penalties under sections 12 and 14 of FIFRA

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	Other (Specify) _____	
		If "Yes" Package wgt	No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jody L. Stobbe	Title Senior Regulatory Specialist	Telephone No. (Include Area Code) 901-272-8550
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 knowingly 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 Senior Regulatory Specialist	
4. Typed Name Jody L. Stobbe	5. Date March 5, 2004	

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Buckman LABORATORIES

BUCKMAN LABORATORIES INTERNATIONAL, INC.

1256 NORTH McLEAN BLVD.
MEMPHIS, TN 38108-1241 U.S.A.
TELEPHONE (901) 278-0330
FAX (901) 276-5343
www.buckman.com
e-mail: knetix@buckman.com

Via Federal Express

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
Arlington, VA 22202

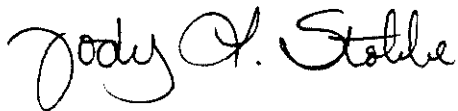
Re: Label Notification per PR Notice 98-10
D-25-1, EPA Registration Number: 1448-198

Dear Mr. Swindell,

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 23, 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 jlstobbe@buckman.com.

Sincerely,
BUCKMAN LABORATORIES INTERNATIONAL, INC.



Jody L. Stobbe
Senior Regulatory Specialist



ACTIVE INGREDIENT(S)	
Potassium dimethyldithiocarbamate	25.0%
INERT INGREDIENTS	75.0%
TOTAL	100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

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 901-278-0330 or 1-800-BUCKMAN for emergency 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. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

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 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: 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 fl. 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 fl. 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-25-1 is used 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 fl. 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 fl. 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. **Not registered for this use in California**