

1448-243

2/18/2010

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 18 2010

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

Attention: Carl Watson
Regulatory Manager

Subject: Notification
WFT-78 Microbicide
EPA Reg. No. 1448-243
Amendment Letter dated January 12, 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,

A handwritten signature in black ink, appearing to read "Marshall Swindell".

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



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1448-243	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) WFT-78 Microbicide	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Buckman Laboratories, Inc. 1256 N. 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

Amendment - Explain below. Final printed labels in response to Agency letter dated _____

Resubmission in response to Agency letter dated _____ "Me Too" Application.

Notification - Explain below. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label Amendment: Non-PRIA action.
 ACTION: Revise the Storage & Disposal Section in order to comply with PR Notice 2007-4

Contact: cfwatson@buckman.com; FAX: (901) 272-6256

Section - III

1. Material This Product Will Be Packaged In:

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	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container

5. Location of Label Directions

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

2. Signature 	3. Title Sr. Regulatory Toxicologist	6. Date Application Received (Stamped)
4. Typed Name Carl F. Watson, Ph.D.	5. Date 12 January 2010	

WFT-78 MICROBICIDE

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ACTIVE INGREDIENT(S)

Hexahydro-1,3,5-tris(2-hydroxyethyl)-s-triazine.....

78.5%

INERT INGREDIENTS.....

21.5%

TOTAL.....

100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
If in Eyes	<ul style="list-style-type: none">- 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	<ul style="list-style-type: none">- 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	<ul style="list-style-type: none">- 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	<ul style="list-style-type: none">- 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.	

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes severe eye and skin damage. Harmful or fatal if swallowed. May cause skin sensitization. Do not get in eyes, on skin or on clothing. Wear goggles or face shield, protective clothing, and chemical resistant rubber gloves when handling. Wash thoroughly with soap and water after handling, and before eating, drinking or using tobacco. Remove contaminated clothing and wash separately before re-use.

Applicators and other handlers must wear long-sleeve shirt and long pants, socks plus shoes, and chemical resistant gloves. Do not apply this product in a way that will contact workers or other persons. Follow manufacturer's instructions for cleaning/maintaining personal protective equipment (PPE). If there are no such instructions, for washables use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. If pesticide gets inside clothing remove clothing immediately, wash thoroughly, and put on clean 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.

ENVIRONMENTAL HAZARDS: 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of waste.

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WFT-78 MICROBICIDE

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A liquid antimicrobial agent for use in controlling microbial contamination in latex emulsions and water dispersible paints, water based metal working fluids and the preservation of drilling muds and workover and completion fluids.

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool (less than 100°F) dry location. Keep container tightly closed when not in use. Do not store with strong oxidizing agents or strong (concentrated) acids.

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 the nearest 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 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for 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 1/4 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 or 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 for: Buckman Laboratories, Inc.
1256 North McLean Blvd., Memphis, Tennessee 38108, USA
(901) 278-0330 or 1-800-282-5626

EPA Est. No. 1839-GA-1

EPA Reg. No. 1448-243

Product Weight 9.6 lbs./gal. 1.15 kg/L

Net contents are marked on the container.

HMIS / NPCA Ratings

Health 2 Flammability 1 Reactivity 0

Last Revision

12/23/2009

WFT-78 MICROBICIDE

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Directions for Use

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

LATEX EMULSIONS AND WATER DISPERSIBLE PAINTS: Add 0.1% (1000 ppm) to the emulsion or paint at any convenient time during the manufacturing operation. 1 gallon of product to 1000 gallons of paint added in areas of the manufacturing process that will allow thorough mixing of the biocide and paint will provide this dose rate.

WATER-BASED METALWORKING FLUIDS: For best results drain and clean the system before adding fresh metal working fluid. To inhibit the growth of bacteria add 0.04 to 0.2% (400–2000 ppm) of WFT-78 MICROBICIDE directly to the use-diluted fluid in the metal cutting/grinding machinery sump to allow thorough mixing of the product and diluted fluid. For example, 0.16 pints of product to 10 gallons of metalworking fluid will provide a dose rate of 2000 ppm. Allow to circulate for about one hour before shutdown. For the addition of any make-up fluid add the product at the same rates as above to use-diluted fluid and mix thoroughly before addition to the system. Treatment of the in-use diluted metalworking fluid should be repeated every four weeks, or more frequently if excessive contamination occurs.

WFT-78 MICROBICIDE may be incorporated in metalworking fluid concentrate at a level that will provide 0.04 to 0.2% product concentration when the fluid is diluted with water for use. The concentrate manufacturer should ensure that any incompatibility will not affect efficacy. Not for use in non-aqueous concentrates.

PRESERVATION OF DRILLING MUDS AND WORKOVER AND COMPLETION FLUIDS: Add sufficient volume to give a concentration of 500–1000 ppm WFT-78 MICROBICIDE by weight in the drilling mud system, workover or completion fluid. For example, 21–42 gallons per each 1000 barrels of drilling mud provides these concentrations. The dose rate in all instances is dependent on the expected initial and on-going level of contamination.

-DRILLING MUDS: While the system is circulating, add the WFT-78 MICROBICIDE in a thin stream. Add additional product to maintain the proper concentration as the total volume of the system increases with the well depth.

-WORKOVER FLUIDS: Add WFT-78 MICROBICIDE into the system and circulate the workover fluid system until the fluid returns clear. Shut the system down and idle for several hours. Remove the workover fluid. The well should be ready for productive use.

-COMPLETION FLUID: Add WFT-78 MICROBICIDE to the completion fluid prior to pumping into the well system.

CONDITIONS OF SALE AND WARRANTY

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risk inherently associated with use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of the Seller. All such risks shall be assumed by the Buyer. The manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to above.

THE MANUFACTURER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

The manufacturer offers this product, and the Buyer and User accept it, subject to the foregoing Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorized representative.