

1448-277

2/18/2010

i/b



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

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

FEB 18 2010

Attention: Carl Watson  
Regulatory Manager

Subject: Notification  
D-25-5  
EPA Reg. No. 1448-277  
Amendment Letter dated January 15, 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 cursive script that reads "M Swindell".

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



United States  
Environmental Protection Agency  
Washington, DC 20460

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

OPP Identifier Number

### Application for Pesticide - Section I

|  |  |   |
|--|--|---|
| 1. Company/Product Number<br>1448-277  | 2. EPA Product Manager<br>Marshall Swindell  | 3. Proposed Classification<br><input type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name)<br>D-25-5  | PM#<br>33  |   |
| 5. Name and Address of Applicant (Include ZIP Code)<br>Buckman Laboratories, Inc.<br>1256 N. McLean Blvd<br>Memphis, TN 38108<br><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:<br>EPA Reg. No. _____<br>Product Name _____ |   |

### Section - II

|  |  |
|--|--|
| <input checked="" 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 type="checkbox"/> Notification - Explain below.                         | <input type="checkbox"/> 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:   |   |  |                                      | 2. Type of Container  |                                  |
| Child-Resistant Packaging<br><input type="checkbox"/> Yes<br><input type="checkbox"/> No  | Unit Packaging<br><input type="checkbox"/> Yes<br><input type="checkbox"/> No | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><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  | If "Yes" Package wgt                 | Other (Specify) _____                                       |                                  |
| 3. Location of Net Contents Information<br><input type="checkbox"/> Label <input type="checkbox"/> Container  |   | 4. Size(s) Retail Container  |                                      | 5. Location of Label Directions<br><input type="checkbox"/> |                                  |
| 6. Manner in Which Label is Affixed to Product<br><input type="checkbox"/> Lithograph<br><input type="checkbox"/> Paper glued<br><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<br>Carl Watson  | Title<br>Sr. Regulatory Toxicologist    | Telephone No. (Include Area Code)<br>(901) 272-6229 |
| <b>Certification</b><br>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<br>(Stamped)           |
| 2. Signature<br>   | 3. Title<br>Sr. Regulatory Toxicologist |   |
| 4. Typed Name<br>Carl F. Watson, Ph.D.   | 5. Date<br>15 January 2010              |   |

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](mailto:knetix@buckman.com)

January 15, 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.: 1448-103, -115, -128, -180, -185, 198, -202, -277, -282, -283,  
-337, -338, -339, -389, -390, -391 & -392

Dear Mr. Swindell:

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


- BUSAN 1058 (EPA Reg. # 1448-103) ✓
- NM-875-11 (EPA Reg. # 1448-115) ✓
- NM-35-1 (EPA Reg. # 1448-128) ✓
- NM-175-11 (EPA Reg. # 1448-180) ✓
- D-10-1 (EPA Reg. # 1448-185) ✓
- D-25-1 (EPA Reg. # 1448-198) ✓
- D-50-1 (EPA Reg. # 1448-202) ✓
- D-25-5 (EPA Reg. # 1448-277) ✓
- D-50-4 (EPA Reg. # 1448-282) ✓

- D-10-14 (EPA Reg. # 1448-283) ✓
- D-33-1 (EPA Reg. # 1448-337) ✓
- D-33-2 (EPA Reg. # 1448-338) ✓
- D-33-3 (EPA Reg. # 1448-339) ✓
- D-33-5 (EPA Reg. # 1448-389) ✓
- D-33-6 (EPA Reg. # 1448-390) ✓
- D-33-7 (EPA Reg. # 1448-391) ✓
- D-33-8 (EPA Reg. # 1448-392) ✓

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](mailto:cwbrown@buckman.com)).

Sincerely,

BUCKMAN LABORATORIES INTERNATIONAL, INC.

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



## 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 four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spill 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. 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 1/4 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 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 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.** 1448-277

**Product Weight** 9.3 lbs/gal 1.12 kg/l

Net contents are marked on the container.

### HMIS / NPCA Ratings

Health 3 Flammability 1 Reactivity 1

Last Revision

12/11/2009

# D-25-5

6/6

## Buckman

### 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-25-5 is used to inhibit the growth of microorganisms industrial, commercial and institutional cooling water systems. In noticeably fouled systems, D-25-5 should be added daily at a rate of 4.5 to 6.8 fl. oz. of D-25-5 per 1000 gallons of system water (40 - 60 ppm) until control is evident. Subsequent additions of D-25-5 should be made to the system as needed at a rate of 2.3. to 6.8 fl. oz. of D-25-5 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-25-5 is used to inhibit the growth of microorganisms in industrial air washer systems. In noticeably fouled systems, D-25-5 should be added at a rate of 10.6 to 13.6 fl. oz. of D-25-5 per 1000 gallons of water (90-120 ppm) until control is evident. Subsequent additions of D-25-5 should be made to the system as needed at a rate of 7.9 to 13.6 fl. oz. of D-25-5 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.

**INDUSTRIAL WATER PURIFICATION SYSTEMS:** D-25-5 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-25-5 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-25-5 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.**

